Appendix 2

Consultation Feedback on the Draft Equality & Inclusion Policy 2012-2015

2-3. Executive Summary

The consultation was carried out to inform a new Equality and Inclusion Policy and objectives for the council. In addition to the policy we are developing an action plan with strong measures and outputs which will support the delivery of that Policy and we will consult on this too. Feedback to the consultation has resulted in a number of suggestions, amendments and additions to the Policy which we will take into account and respond to and act upon.

There are two documents which currently summarise the council's commitments to equality and inclusion and the actions it is taking to achieve this: 'Working towards an Inclusive City' (our Policy) and the 'Single Equality Scheme' (our action plan). Both of these documents ended in December 2011. It was decided to take this opportunity to create one single document which would bring together our commitment to equality, our equality and inclusion priorities, our objectives and our actions to achieve those over the period of 2012-2015.

Alongside the Policy we are developing an action plan to address the issues and meet our objectives. This will include regularly monitoring the action plan and reporting on progress to the council meetings and stakeholder groups that hold the council to account.

Our Equality Impact Assessment (EIA) process, in all areas of the council, will continue to support the new Policy and action plan informing all council services, policies, strategies and employment practices. This will make sure that barriers, needs and opportunities are identified and considered in all aspects of the council's work.

In addition, the first of the council's top five priorities in the Corporate Plan 2011-2015 is tackling inequality. The Corporate Plan sets out what the council needs to do to meet these priorities over the next four years.

> http://corporateplan.brighton-hove.gov.uk

The draft Policy for the consultation document was based on a wealth of information and views already given by a wide range of groups, organisations and communities through recent engagement including the Equality Framework for Local Government; consultation for the Single Equality Scheme and reporting on Equality Impact Assessments through the Equality Steering Group.

With the input of communities, groups, staff and volunteers we had identified five equality and inclusion objectives as areas which the council should be focussing on and tackling. The consultation resulted in a mainly positive response from those who replied. Out of the 43 responses, 41 respondents agreed with the five equality and inclusion objectives.

> *"The broad principles are excellent".*

A number of themes came out of the information put forward by respondents and these are described below. Respondents agreed almost in total with the objectives identified, however they wanted specific actions which would measure and support these outcomes. By including the action plan with the objectives it would have given respondents a clearer

picture around the actions the council propose to carry out to make sure the policy is delivered.

Together, the Policy and the action plan revised from the feedback from the consultation, will describe a strong and measurable process to tackle equality and inclusion issues across the city. The Policy and the action plan will use the formidable joint efforts of the council and its officers, a wide network of community and volunteer groups and the feedback of directly affected individuals and groups within the community. Engagement with community groups formed a strong area of feedback, particularly in relation to delivering and embedding equality and inclusion issues across the city.

The consultation supported our view that a number of elements are important in genuinely making progress in this area. These include placing equality and inclusion issues at the heart of everything the council does. This needs strong communication and leadership to succeed; recognising the value of partnerships; the importance of training; collective and senior level commitment and considered collection of and use of data. The consultation has demonstrated that there is plenty of support within the city to give equality and inclusion issues the high priority they deserve, but we need to enable groups and individuals to work collaboratively with the council and to be clear-minded in our processes to take action and measure progress.

4. Data and Information

Existing resources were used to drive and develop this consultation work. In addition as part of ensuring that the new policy is 'fit for purpose', work has been undertaken to review as many data and intelligence reports as possible. These include the Reducing Inequalities Review, Joint Services Needs Assessment, Child Poverty Needs Assessment, Annual Report of the Director of Public Health and the Place Survey. This has enabled the council to establish a good understanding of the key quantitative and qualitative evidence informing its equality and inclusion approach.

5. Consultation Process

A range of processes were considered to consult on the new equality and inclusion Policy. A consultation document was widely circulated from 21 December 2011 including a survey added to the consultation portal.   The survey closed on 3 February 2012.   This consultation document was used to facilitate discussion with a number of different individuals, communities and groups as well as staff members.

Over 100 community and voluntary sector organisations were invited to take part in the consultation process through a targeted mail-shot and these included those working with equality and social inclusion groups. The council's staff forums (Black and Minority Ethnic, Lesbian, Gay, Bisexual and Transgendered and Disabled Staff) were also invited to take part. In addition focus groups took place with disabled and LGBT people which attracted approximately 30 people.

The consultation ran for a six week period and there were 43 responses to the Equality and Inclusion survey.   Respondents were able to comment on each individual objective and its commitments. Respondents did not have to comment on all five objectives. They could chose to comment on only those they were interested in or had views about.

Nine responses were made by email rather than on the portal and these have been included in this feedback. In total 41 respondents agreed with all five objectives. One respondent disagreed with all five objectives because

"there are no measureable outcomes or standards = it's just a wish list"

As explained above, the action plan we are developing will provide these measures. We have also matched existing corporate indicators to the objectives so progress can be measured.

From the feedback a set of themes have emerged which will influence the final text and implementation of the Policy.

6-10. Summary of Feedback

There was a very positive response overall to the Equality and Inclusion survey. One respondent commented that it is

> *"a sound statement of intent"*

and the vast majority of those who responded agreed with the objectives identified. The responses ranged across a number of areas: requests to amend the objectives to make them stronger; areas where respondents suggested specific information could be added, such as the types of stakeholders the council should be collaborating with; the types of groups and individuals the policy should be focussing on and suggestions for processes to support the policy. From the information provided in the survey we have identified a number of general themes – points which were repeatedly and strongly made under all the objectives and specific themes – repeated through each of the individual objective.

General Themes

1. Demonstrate how we will know if the policy is making a difference/objectives being achieved

There was strong feedback relating to the need for greater clarity about how the council will be able to demonstrate that its policy is making a difference; what measures will be used against the objectives and commitments. One respondent asked

> *"Is this just a wish list"*

There was mixed feedback about the level of detail within the policy. Some respondents felt that the policy was too short and needed more information on measures and actions. Others felt that there were too many objectives and the council need to reduce and further focus the objectives.

2. Underpin the policy with real practical action

Whilst overall the consultation feedback was positive about the draft objectives, a key message that was regularly given was the need for the council to back up the policy with real, practical actions to achieve the objectives. One respondent stated the

> *"need to ensure not just lip service and that real steps are made to deliver the commitments".*

3. Secure management buy-in to the policy

There was repeat feedback about the need to ensure that there was buy-in to the policy throughout the management levels in the council, ranging from encouraging and releasing staff to attend training to adequately funding engagement. One respondent commented

> *"I experience a profound and ingrained level of resistance to change as well as inertia to engaging with the topic at most levels of the management tree, as well as non management workers".*

4. Better collaboration with the community and voluntary sector

Under all of the objectives we received comments about the council working more closely and more collaboratively with the community and voluntary sector to make best use of knowledge, expertise and relationships in both sectors with different communities in the city. A specific comment that was regularly made was the need to recognise and resource the vital role the sector plays as a bridge/link to specific communities, especially the very marginalised and those that do not meet public services criteria or thresholds.

5. Embedding equalities and inclusion in council processes

Comments were received that asked for the inclusion of information about how equalities and inclusion are/will be embedded in council processes, specifically, commissioning. Consultation respondents welcomed the objectives on fair services but sought more specifics on how this would be achieved through commissioning and not just delivery.

6. Not a level playing field

Feedback consistently mentioned the need to be clear that equality for all was the desired outcome but that this required a focus on individuals 'with protected characteristics'. Feedback was that this focus was not explicit enough in the current wording of the objectives. In addition, that socio-economic inequality and economic exclusion were not referenced explicitly. One respondent commented

> "*I would like to see the council being more representative, particularly of working class people.*"

Poverty was mentioned many times as a key inequality and exclusion issue.

There were suggestions that the policy and action plan should give more focus to specific groups/individuals: people of different race, older people, Gypsies and Travellers –

> "*the council should take a greater community leadership role in promoting awareness of Gypsy, Romany Traveller culture,*"

people living in care homes, vulnerable adults and marginalised young people and diverse groups with protected characteristics.

7. Advocacy

It was highlighted that specialist groups and the voluntary sector may be best placed to raise service gaps relating to equality and inclusion issues within council services. In the case of certain individuals and groups they would not be able to self identify or specify their vulnerability, or to raise any problems they have in accessing services. This could relate to individuals/groups with impairments, either mental or physical. The council needs to work closely with community groups and volunteers as advocates and to understand the importance of community groups/volunteers in being able to identify service gap issues and to share data to support any equality and inclusion gaps in the services the council provides .

Specific Themes

A. Informing, Involving and Collaborating with Communities

Respondents felt that the policy should state explicitly how the Council would ensure that communities of interest are fully engaged in community groups and developed (directly or indirectly) by the Council. In particular there was feedback on recognising the need to do more work on engaging very marginalised and socially isolated individuals.

There was a strong message that the policy should include the council recognising and supporting the engagement activity of the community and voluntary sector, through which the council is able to communicate and work with equality groups in the city. It was felt that the council should be more actively seeking and acting on feedback. One respondent said,

> *"Communities need to see tangible things being done, to feel that their issues and concerns are being heard and that actions will be taken. I would include something about the efforts that are already in place to try to achieve the aims above and examples of who the organisations are and examples of good practice already in existence."*

A strong message was that to achieve the commitments on engagement the council would need to underpin this with a commitment to sufficiently fund engagement, both by itself and by the community and voluntary sector. Moreover, that there was a need to recognise proportionality in engagement. It was felt that the standards for engagement as set in the Community Engagement Framework (CEF) were not being referred to accurately, in particular around proportionality. See appendix 1 CEF standards.

The term "stakeholders" was felt to be too generic and a "catch all" phrase.

If we want more excluded groups to engage respondents felt we need to use the reward and recognition guidelines and encourage participation and also take a more collaborative approach. Respondents felt that the council remained focussed on consultation and involving many people generated few genuinely collaborative opportunities.

There were a number of suggestions regarding improving and strengthening communication ranging from how the council communicates general information to how it communicates information about equalities and inclusion issues.

> *"Communication could be improved by using plain English and minimizing the use of 'jargon'. Written communication could be improved by choosing more accessible fonts such as Arial and by using more contrasting colours on leaflets and flyers. Giving more provision to those who do not use information technology would improve communication."*

Respondents felt we should target communication for and to very excluded groups.

B. Learning and Development for Staff and Volunteers

There was a high volume of feedback regarding the importance of appropriate training for staff and volunteers. The skills and awareness of staff were deemed critical to successful implementation of the policy and making change happen. This should include enabling employees and communities to recognise equality and inclusion issues and working with diverse communities. It was felt important that staff had the skills and confidence to increase the level of reporting of equality and inclusion problems. This would reflect an improvement in their understanding of different issues affecting particular groups and individuals and a willingness to tackle these. It was felt important to work closely with community and voluntary groups who have specialist knowledge about different communities, to provide learning and development for council staff.

C. Collecting, Analysing, Using and Sharing Data and Information

Feedback on data and information focused on three key messages: filling in the gaps remains a priority but sharing of data between organisations in the public and community and voluntary sector, using the analyses and making both data and analyses publically available were equally significant. The sharing of data and information was seen to be of particular importance not only for improving services, regardless of provider, but also enabling additional funding to be attracted into the city. Sharing and making publically available information would also support the council's commitment to being open and transparent and help build trust. It would particularly help identify the equality groups which the council has limited or no information about. Linked to the latter point, a strong recommendation from the feedback, similar to the comments on engagement was resourcing the community and voluntary sector to collect, analyse and provide information on equality groups in the city.

It was commented that the council must make sure that all staff understand their responsibilities for data protection and confidentiality when collecting and using data and can reassure individuals of this, whilst at the same time requiring individuals to give their details to the council only once.

D. Partnership working

Key messages focused on improving joint working between public partners to improve communication; engagement; data collection; analysing of equality and inclusion data and also maximising resources, given reducing funding.

Respondents wanted to improve how the council works with community and voluntary organisations ensuring equal partners. This may include factoring in a cost for resourcing the sector to play an equal role. It was felt that the policy should include an explicit statement on the role of the community and volunteers in working with the council to help it meet its equality and inclusion objectives.

It was also noted that resourcing work to facilitate community and voluntary working better together would be a prudent 'invest to save' measure.

E. Employment and Procurement Practices

Key messages were that the council should make more effort to have a workforce that represents the socio-economic make up of the city as well as equality groups, and that it

should be making better use of local equalities information when developing its workforce development plan and recruiting staff. Moreover, that there should be provision in place to support individuals with 'protected characteristics' to develop their skills and capabilities and progress within the authority.

Many comments were made about the council's commitment to monitoring and enforcing contractors compliance with the council's equality and inclusion policy; how would it do this and what penalty would it apply to suppliers that were found not to comply. Also, there was a question about the council making a commitment to contracting with suppliers that pay a living wage.

F. Making Services Accessible

The council needs to make sure that all services, both those provided directly by the council and those commissioned from an external provider are equality impact assessed and monitored for inclusivity. There was a perceived inconsistency across the services. In addition, there should be a focus on considering the issues for potential/future as well as existing service users and making sure that all services not only carry out equalities monitoring but use the information they collect to inform changes to services.

11. Conclusions

The overall impact of the consultation process has been positive. Out of 43 responses to the consultation, 41 respondents agreed with all of the objectives identified. Only one respondent disagreed with all the objectives because they felt there were insufficient measures and wanted to see clearer links with outcomes. One further respondent disagreed with Objective 1 only.

Learning through the process

The Equality and Inclusion Policy consultation explained to respondents that the policy and the action plan worked together to provide the basis for equality and inclusion work within the council. Feedback showed it would have been helpful to include a copy of the action plan with the policy objectives. This would also give a flavour of the types of work planned and ongoing which are being carried out to embed equality and inclusion in all that the council do. We tried to give a balance between allowing respondents to give as much input as possible to the Objectives without causing a high level of complexity by attaching too many supplementary documents. The feedback suggests the action plan would have given respondents a more rounded picture of the existing focus around ongoing equality and inclusion work.

Context of Reduced Funding

While there was a negative aspect around the reduction in funding, it was also felt that the council can turn this into an opportunity for the city. In order to deliver a strong equality and inclusion policy the council will need to work closely with those who use and help us to deliver our services. This means making sure that the council and its partners can work seamlessly together to deliver a strong action plan for all of its equality and inclusion work.

This means looking at duplications within the services which are being offered and removing complexity wherever we can. There are strong examples within the city of good practice and processes within communities, by volunteers and within the council itself. By using and celebrating these examples of strong equality and inclusion work the council can champion these good processes and practices. We can use this as an opportunity to promote the success stories within the city and use them to mirror best practice across the city and the council.

Next Steps

As part of our commitment to measuring the impact and effectiveness of the Policy we will be introducing a new Review process which will include ongoing opportunities for consultation and feedback. This is still being developed but is likely to include a formal stakeholder review which will include community and voluntary groups, Councillors and partners.