Equality Standard for Local Government

Guidance 3

Developing Equality Objectives and Monitoring

Introduction

Guidance 2 for the Equality Standard explained the processes of assessment required at Level 2 of the Standard. Following the publication of this guidance a number of pilot studies have been undertaken with local authorities using the INRA process to develop Equality Objectives. These pilots have suggested some additional advice is needed to support the INRA process, alongside the guidance on objective setting. The following guidance is designed to help local authorities move from Level 2 through to Level 3 of the Standard. The key elements of the guidance deal with

- Developing Equality Objectives and Performance Indicators
- Establishing Data Collection and Monitoring Systems
- Integrating the Equality Standard within Business Planning
- Pay Review
- Local Labour Market Studies

The guidance is organised into two parts: Part One provides general guidance showing the link between Impact/Needs/Requirement Assessment (INRA), objective setting and monitoring; Part two examines a number of issues which have arisen as frequently asked questions.

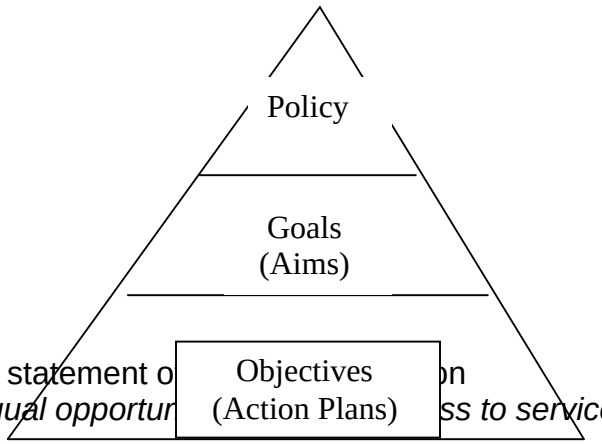
Part One – Setting Equality Objectives

Part One works through the process of setting objectives, targets and incorporating these into a monitoring and performance management system. The section starts with additional guidance on impact and needs/ requirements assessment. We have done this for two reasons. First, work with a number of authorities has allowed us to refine an approach to INRA. Second, simply providing guidance on objectives and targets does not indicate how the setting those targets is influenced by the way that an INRA is set up. The process needs to be viewed in its entirety. For this reason we have worked through particular example - an assessment of leisure and tourism services – to provide context and meaning for the more general description of process.

This Section to be boxed – or other layout

Setting Objectives: General principles

Objectives can be broadly understood in relation to policy and goals within an organisation



Policy

Broadest possible statement o on
e.g. to promote equal opportur ss to services within the authority

Goals/Aims

Statements that describe an improvement in performance towards meeting the policy

Setting Objectives – Some General Principles

e.g. *develop a diverse workforce that is representative of the population within the authority*

Objectives

Realistic steps to attain the goal – these should be specific, measurable and attainable. A general model for defining objectives uses the acronym SMART:

Specific	What exactly are we going to do, with or for whom?
Measurable	Is it measurable and can we measure it?
Achievable	Will a change in current authority policy or practice affect the outcome? Can our objective be carried out in the timescale or in the current political climate
Relevant	Will this objective lead to the desired results?
Time Framed	When will we accomplish this objective

e.g. By 2005, establish positive action training programme to encourage female and BME Staff in housing maintenance trades

In setting objectives it is useful to recognise that there are different types of objective

Process Objectives: how you will attain the overall objective

Tells you what you are doing and how you will do it - describes participants, interactions and activities

- By June 2005 the housing manager will establish a programme of positive action training to train at least 10 women and 10 members of the BME community in plumbing and painting and decorating.

Impact Objectives: what impact the process will have

Tells you how attitudes, knowledge and behaviour (short term) will be changed – describes the degree to which you expect this change

- At the end of the training, 15 of the people trained will be able to achieve the qualifications and skills necessary to meet the job specifications for entry into the council's maintenance department

Outcome Objectives: what you will achieve

Tells you what the long term implications of your programme will be – describes the expected outcome for the council/the community/the organisation (*measurement of outcome objectives is problematic because there may be a range of influences on the outcome)*

- By 2005 female employment in housing maintenance will have increased to 5% of the workforce and BME employment will have risen to 5% of the workforce

In setting equality objectives to meet a particular goal you may need a range of process, impact and outcome objectives.

Setting Objectives as part of INRA

The example of the process set out in the preceding section illustrates how objectives may be derived. Equality objectives need to be based on an assessment of the needs and requirements of particular groups of people. Some objectives might be set as the result of legislation, others according to local conditions and priorities. Where local need is to be addressed, an impact/needs/ requirement assessment will throw up information that suggests a particular objective.

e.g. the property services division through their impact assessment found that there was a serious access problem to one of their buildings because of a poor design of the access ramp.
Objective:
By January 2005 remedial works to be carried out on the council offices x to ensure full access to the building by people using wheelchairs, pushchairs and other mobility aids.

In some cases the INRA will demonstrate a failure or weakness in the local authorities procedures or practices (or it will demonstrate a failure to achieve established goals or objectives), where the solution is not obvious. The equality objectives that may be derived in these circumstances will vary but they are likely to fall into the following categories.

a) *We have information but the problem isn't clear or can't be understood.*
    - Consult existing best practice/other local authorities/academic research for possible solutions – develop relevant objectives
    - Identify further research – information required – set up equality objectives around research and information procedures.
b) *There is not enough information to understand the equalities impact of the policy or service provision*
    - Develop objectives to meet the information needs. This may be data collection, consultation or research
c) *There isn't any evidence of different outcome for user groups*
    - Consider whether the information you have is sufficient
    - Develop objectives to explore the possibility of unmet need
    - Develop objectives to maintain and promote 'good equalities practice' in line with the Corporate Equalities Policy

Remember, the purpose of conducting an impact/needs/requirements assessment is to identify the needs or requirements of people within your authority, and to determine the impact that your policies have on them. The way we develop and deliver services is determined by those in local authorities who may have very different life experiences from their communities. There is no single method of finding out what you need to know to make your services accessible to, and appropriate for, people in your locality. The usefulness of the data you collect is only as good as the questions you ask and what you do with the answers you get.

Undertaking a needs/requirements assessment (INRA)

The Process

Stage 1
Selecting the Assessment

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Stage 2
Selecting the team

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Stage 3
Scoping exercise:
Defining policy
Identifying equality issues

↓

Stage 4
Data Collection

consultation

↓

Stage 5
Analysis and Objective setting

↓

Stage 6
Monitoring and incorporation into
performance management

Stage 1
Selecting what to assess
It is possible to carry out an impact assessment on any aspect of the local authority's work and defining the focus for assessment is an important decision making task. Sometimes the focus will be very clear at the outset, for instance where a new policy is being introduced and an impact assessment is required. In other cases there will be a choice in the approach taken. The focus may be

- Policy;
- Strategy;
- Service functions;
- Major project.
- Or a group of services/policies

The way that the initial focus for the study is defined is important and should be part of a managed process in which the authority looks at all its activities (functions, policies and procedures) to develop a strategic plan for INRA across the authority.

Developing a strategic plan for INRA

The strategic plan for INRA should be undertaken at a corporate level within the organisation. The reasons for this are two-fold. Firstly, it should be recognised that the activities undertaken at service level are often connected to other activities within the authority, for instance, a policy or strategy may cut across departments or the activity of one service area (e.g. property services) may have an impact on other service areas. Secondly, there are questions of co-ordination and resource allocation to consider and while some resource allocation may be handled at a departmental level, there are key resources questions (e.g. consultation), which require a corporate overview.

The corporate plan for INRA involves the following operations

i) A listing of the functions, policies and procedures for the whole of the authority. In essence this is a listing of every activity undertaken by the authority. (The aim here is to list the activity of the authority and note the overlaps and interrelationships).

ii) Undertake a risk assessment associated with the activities on the list in order to ascertain priorities.

iii) Decide how activities will be grouped for the purpose of INRA. This will depend upon a number of factors e.g. a local authority that has introduced a new community safety strategy would want to conduct an INRA on the strategy as a whole and this would cut across a range of activities. The prioritisation of this strategy would affect the overall planning of INRA. Because of overlapping and inter-related activity the planning of INRA will vary across local authorities and will take account of local circumstances.
In constructing the plan, a number of factors should be considered

- Overlap between INRA's - sometimes work on cross-cutting issues may mean that an INRA includes a range of service areas but you should consider whether this study provides an adequate INRA for each of the services or whether the scope of the cross-cutting study is too limited
- Where the services are internal to the authority you could look at these services separately or consider their impact in relation to direct services, or both. For example an INRA on property services will take into account both changes to, and maintenance of the authority's buildings for the purposes of carrying out the council's business. The scope of the INRA may be limited to its own area of responsibility. However, if you look at property services as part of an INRA on social services, you will have to take into account the relationship between the two departments and the impact of the corporate service's policies on the ability of the direct service to deliver its objectives. Approaching INRA in different ways may yield different outcomes.
- The level of aggregation – do we look at individual services or groups of services? Different levels of aggregation may yield different objectives.

Example

Setting Equality objectives for continuous improvement

To illustrate the INRA process an example has been used throughout this section of the guidance. The focus of the example is the provision of leisure and tourism services within the local authority area. Consideration will given to authority policy and access to and use of facilities and services

Stage 2
Selecting the assessment team
The team for carrying out an INRA should consist of more than one person in order to broaden the range of perspectives and knowledge to be brought to the process. In general, the team should be led by the service manager responsible for the policy or service. (The INRA process will develop service objectives that will form part of the service plan and therefore requires service manager involvement). In addition to the service manager, additional team members may be considered along the following lines

- Relevant and appropriate employees. This may be another member of the service team with particular knowledge of the area. It may be a member of front line staff.
- Stakeholder involvement. This would be particularly important for internal corporate services that may have an impact in other service departments. Human Resources would be one example but this would apply to all internal services. Stakeholder involvement could involve a service user representative from outside the authority.
- Critical friends. It may be valuable, particularly in complex areas to involve a critical friend, which may be another manager or an external representative.
- Equality expertise. It will be important to have some equality expertise to support the process

The assessment team need not include all of these elements because knowledge and expertise can be obtained through consultation as well as through direct involvement in the team. We would recommend that an assessment team should involve more than one person but should not, generally be more than four (for reasons of manageability).

Example
An authority leisure services department delivers a wide range of services. It runs three leisure centres that include two swimming pools, there are five public parks, a museum, an arts centre. Leisure services is also responsible for a main public library and two branch libraries and is responsible for the authority's tourism policy and initiatives. A programme has been established with the agreement of the corporate equality group and the steering group to carry out a series of INRA over the next eighteen months. The first assessment will deal with leisure centres, swimming pools and parks. The team for reviewing leisure services was selected by the leisure services manager. It includes the managers specifically responsible for leisure centres and parks and a manager from one of the authority's leisure centres

Stage 3
Scope of the assessment
The focus of the study will have been established at Stage 1. Following the formation of the assessment team it is useful to review the focus and consider the best way to organise the study.

Having agreed the focus of the assessment there are two steps associated with the scoping exercise

- Defining the service/policy/procedure that you will be impact assessing
- Identify potential equality issues and factors

Example:
An assessment team has been established to carry out INRA on the local authority provision of leisure centres (including swimming pools) and parks. The team recognised that use of leisure centres was part of a more general pattern of service delivery. It was decided to add two voluntary sector representatives (from the local disability forum and the race equality council). The libraries manager was requested to join the team to act as a critical friend and to gain assessment experience for the libraries' INRA. Although the team might have been extended further it was felt that too large a team would be unmanageable and other interests could be dealt with through the consultation process.

Defining the Service/Policy

Although the team have an agreed focus for the study, it is important to set out the documents and procedures that are included in this focus and any other details that define the service and the way it is delivered. These should include drivers for change (eg new legislation). The following questions may be useful. (The second column gives specimen answers taken from the leisure services)

	Example
What are the aims and objectives or purpose of the policy or service?	*The authority has a written policy that states that it will provide leisure facilities appropriate to the local population and their leisure needs*
Is the policy or service affected by external drivers for change?	*The Disability Discrimination Act and Race Relations (Amendment) Act. Internal Risk Assessments indicate that this service may fall short of statutory requirements*
Who implements the policy or	*The policy is implemented by leisure*

strategy?	*services department managers and staff*
Who will be affected by the policy and the way the service is delivered?	*The whole local authority area population*
What outcomes do we want to achieve and for whom?	*The authority wants to meet leisure needs of the local population*
Are other organisations involved in delivery?	*Not at this stage. Consideration is being given to outsourcing leisure services in the future*
What are the key performance indicators?	*No formal performance indicators developed.*
What existing assessments are there?	*No systematic assessment of service use has been made*

Identify potential equality issues and factors

Identification of potential issues may be done by the team or a broader group may be convened to assist with this activity.

	Example
What do you know already about equality impact or need?	*The leisure centre manager and parks manager is fairly sure that there is very little BME take-up of these facilities.* *The parks manager is aware that there is concern about women's safety in one particular park.* *Although there is limited disabled access and limited appropriate supervision for one of the swimming pools, the second is inaccessible to people with disabilities*
Is there any evidence that there is higher or lower take-up by particular groups?	*Monitoring records indicate low minority group use of leisure centres and limited use by disabled groups.* *There is no evidence for use of parks*
Have there been any demographic changes or trends locally?	*Examination of census data shows that Asian heritage people make up 5% of total population and 9% of those under 16 years old*
Is there any indication that particular policies create problems for specific	*There are thought to be no specific policy issues.*

groups?	
Where can relevant information be accessed?	*The team has access to census data on ward by ward basis and has some monitoring data on group use of facilities* *Each service/ facility keeps records of records of use where it can (use by voluntary disabled and BME groups). It has not been possible to monitor general use of leisure centres and swimming pools*
Are there any equality objectives	*To provide disability modifications to accommodation where needed*

Stage 4
Collect data

In most cases the initial INRA will rely on existing data sources. Additional data may be collected as part of the assessment and additional consultation may be carried out. The decision will depend on the judgement of the team. There are likely to be data gaps at this stage but the collection of new data could be one of the 'equality objectives' emerging from this initial assessment. This would then be included in the service plan for the following year or in an action plan

- Decide what data and management information is needed
- Use both quantitative or qualitative data
- Ensure there is information that allows all perspectives to be taken into account

Identify and document any gaps in data. Explain how these gaps will be addressed. The team may have to generate primary data.

Identify all current and relevant data sources (this matrix is indicative and should be broadened to accommodate other data)

Is this material consistent with the rest of the story?

Data	**When Collected**	**Source**	**Gaps**
Complaints	Current	Central complaints system	*Not systematically monitored for equality purposes Police have*

			incident data for parks and other public spaces
Applications for group use	Current	Kept by leisure centres	*Data is collected but not systematically monitored for equality purposes. Indicates low BME applications*
Allocations/take-up	Current	Kept by leisure centres	*Not systematically monitored for equality purposes.*
Satisfaction rates	N/A	N/A	*N/A*
Performance Indicators	None	Some BVPI data not analysed	*None*
Access Audits	None	None	*None systematically identified, although problems with access are known*
Census data	2001	ONS	*Need to extract details for equality groups*
Benchmarking	None	None	*None*
Results of consultation	Current	Equalities forum	*Problems of access raised by disability representatives and by women's representatives about harassment*
Workforce profile	Current	HR	*Women underrepresented at management level, BME and disabled staff throughout.*

Consultation

	Example
Is there enough information from recent consultation to give you the information you require?	*The authority is currently carrying out a leisure services take-up survey and consultation*
Does the service have on-going dialogue with relevant interest or user groups?	*There is an equal opportunities forum that meets every three months; disability access has been raised but BME take-up has not been discussed; women's representatives have raised safety and security issues*

Depending on the existence or not of recent and reliable consultation results an authority needs to ask the following questions:

	Example
Who do we need to talk to?	*A representative cross-section of the community and representatives of low take-up groups*
What groups or individuals have legitimate interests?	*All people living within the local authority area*
How do we ensure that they are part of the consultation?	*The authority needs to know which groups have low leisure service take-up and why*
What methods do we employ?	*Does the authority issue a questionnaire; does it visit people in their homes; does it visit community groups*
How do we make it accessible?	*Which of the above methods is likely to yield best results given that some of the individuals and groups are considered 'hard to reach by the authority*
What resources are available?	*What time scale is set for obtaining information; are there staff with appropriate skills; are translation facilities available?*

Stage 5 Analysis and Objective Setting

The purpose of carrying out an Impact/Needs/Requirement Assessment (INRA) under the Equality Standard is to provide the basis for creating Equality Objectives and Performance Indicators that will drive improvement and change in delivering equalities. Using the model established in Guidance 2 the findings of the INRA may provide a number of possible outcomes.

1. The INRA shows that employment practices or services have a different impact measured by race/gender/disability.
2. The INRA shows a different impact which is demonstrated to be adverse impact
3. The INRA shows no differential impact in employment practices or service delivery
4. There is insufficient evidence to judge whether there is differential impact
5. The INRA indicates that there is unmet need across one or more groups

It should be clear that if the outcome demonstrates adverse impact then the authority should be taking immediate action to remedy the situation and objectives would be set accordingly. However, where outcome of the INRA falls into one of the other categories set out above there will be also be a need to set objectives. The purpose of these objectives will be to

- Improve the quality of data/research so that a there is a clearer understanding of impact
- Develop ‘good race relations’/ ‘good equality practice’
- Deliver Corporate Equality Policy/ Corporate Objectives on Equality

No Differential Impact/ Not Enough Evidence

In carrying out an assessment, the assessment team will frequently find that they don’t have enough information to make an assessment. In this case they would consider whether to carry out immediate research or whether to set up equality objectives and targets that will fill the gap. This may involve new forms of data collection or research. They may also consider their service with reference to ‘good practice’ inside the authority and outside. By doing this they may identify objectives to promote good equality practice.

No evidence of Impact/ Insufficient Evidence

In many cases the outcome from the INRA will be ‘no evidence of adverse impact’ or at least insufficient evidence. In these cases the team should consider

- whether there is evidence of unmet need.
- Objectives that will improve information/evidence

Differential and Adverse Impact

Identifying adverse impact is a key part of the INRA process. In making a judgement of adverse impact the assessment team are likely to go through a number of stages:

- First they will have measured through their collection of data, a different impact of their employment practices or service delivery on women or black and minority ethnic groups or disabled people.

- Secondly they will have examined whether this different impact is adverse. Does it disadvantage or discriminate unfairly against any of the groups in a way that is unlawful. (This may be a difficult decision to make and where adverse impact is indicated then legal or expert opinion may be required)

- Thirdly, having established that there is adverse impact, identify potential solutions to remedy the situation.

- Finally, set objectives to achieve the preferred solution within a reasonable timescale.

The question of adverse impact and its interpretation in law may be complex but the purpose of INRA is for local authorities to develop awareness and take reasonable action. The timescales for reasonable action will depend on the scale and nature of the problem identified. The following example illustrates how the findings of differential or adverse impact may be dealt with in practice.

Example

A local authority has completed an assessment of the use of its leisure centres and parks in the district. The assessment team have identified a number of issues that point to unequal access and use of the facilities. For the purpose of the guidance we have selected three of the issues identified by the team in order to illustrate the process of objective setting.

Issue 1: A relatively low level of use leisure centre facilities and parks by the BME groups particularly among adult members of Asian communities.

Suggests unmet need and potential adverse impact

Lack of awareness of facilities among adult BME population; fear of harassment

Cultural problems with use of facilities (Muslim women swimming in mixed gender sessions)

Issue 2: Consistent dissatisfaction expressed by disabled representatives at the equality forum about a range of leisure centre and parks access issues.

Access and specialist provision in leisure centres (one swimming pool has disability access and this is limited); access issues for people with mobility problems and sight impairments in parks (uneven paths and overhanging branches, poor signage, lack of differentiated cycle paths, insufficient seating).

Issue 3: The user survey showed that women were concerned about safety in the local parks. They used the parks more than men, particularly with children. Their concerns were seen by the team as a issue of unequal access.

Objectives and targets

The service team needs to develop an objective or series of objectives. Explicit targets should be set to meet the objectives. These may be qualitative and/or quantitative and should reference performance indicators where appropriate. Reasonable timescales should be attached to targets. If achieving one target depends on the achievement of another that will clearly structure the action plan in a particular way. In the introduction a distinction was made between different kinds of objectives: process, impact and outcome

Process objectives

- Complete consultation and assess what patterns of use are for both leisure centres (including swimming pools) and parks. Gain insight into reasons for current patterns of use.
- Review the way in which leisure centres make their facilities available; issues of cultural and religious needs
- Review access issues for leisure centres (including swimming pools) and parks
- Publicise changes in procedure to 'hard to reach groups'. Publicity effort to start within three months. Will be reviewed after one year
- Develop liaison between leisure centres and parks' management' BME and disabled communities through equality forum to look at take-up and harassment issues.
- Develop liaison between parks management, local women's groups and, for example, mother and toddler groups
- Report on community liaison and harassment with action plan

Impact objectives

- Raised awareness and knowledge about what facilities are provided
- Increased confidence among BME people and people with disabilities about use of facilities

- Provide appropriate facilities with improved access

Outcome objectives
- Increase in use of leisure facilities by adult BME people
- Increase in use of leisure facilities by people with a range of disabilities/impairments
- Increase in use of parks by BME people
- Increase in use of parks by women and younger children
- Increase in use of parks by people with a range of disabilities/impairments

Stage 6 : Monitoring and incorporation into Performance Review

Monitoring is an activity designed to assess or measure progress against specific targets and therefore has to be planned and a process defined at the same time as targets are set. We have indicated three kinds of targets in the example;

- process improvements which are essential to service delivery improvement.
- impact objectives to indicate progress and change
- outcome objectives that may be qualitative or quantitative;

The different kinds of objectives require different kinds of measurement and monitoring.

- Process targets are tasks that may or may not be complete. They are not *measurements* of improved outcome.
- Impact objectives require measurements of progress and change
- Service delivery improvements are measurable in various ways. Performance indicators may be narrowly quantitative (the number and characteristics of people who use a service) or broader more qualitative assessments of improvement.. The key underlying principal of the Standard is continuous improvement. Performance indicators should be of the type that allow this kind of measurement

In the example that we have been following xxx objectives have been set

Process objectives and targets

- Complete consultation and assess what patterns of use are for both leisure centres (including swimming pools) and parks. Gain insight into reasons for current patterns of use.

Target:	**Complete consultation and assess patterns of use; gain insight into take-up patterns within nine months**

Specific	Production of analyses and report
Measurable	Completion of report
Achievable	Resources already allocated
Relevant	Underpins revision of service and accessibility improvement
Time-framed	Specific delivery date

- Review the way in which leisure centres make their facilities available; issues of cultural and religious needs. The review will be based on the consultation and assessment report. *The aim of the review is to provide a framework for widening the use of leisure centres by BME and disabled people by making them and more 'user friendly' to low-use groups and by reconsidering the range of activities that are provided*

- Review access issues for leisure centres (including swimming pools) and parks. This review will run in parallel with the previous one but concentrates specifically on physical access for people with a range of disabilities. It will take into account access to leisure centres (and swimming pools) and use of parks

Target:	**Produce review within three months**
Specific	Produces specific recommendations for changes
Measurable	Completion of review
Achievable	Resources committed to review
Relevant	Underpins change in services
Time-framed	Three months

- Publicise service changes for 'hard to reach groups'. Publicity effort to start within three months. Will be reviewed after one year.

Target:	**To publicise changes in procedure to 'hard to reach groups'. Publicity effort to start within three months. Will be reviewed after one year**
Specific	Requires targeted publicity scheme
Measurable	Requires monitoring; yearly review
Achievable	Will require commitment
Relevant	Key to increased take-up
Time-framed	Three month start; year end review

- Develop liaison between leisure centres and parks' management' BME and disabled communities and women's groups through equality forum to look at harassment and community relations issues.

Target:	**Leisure issues to be a permanent item on equality forum agenda**
Specific	To be on the agenda at next forum meeting
Measurable	Report in meeting minutes
Achievable	Council support and officers have allocated time to attend
Relevant	Underpins changes in service
Time-framed	Next forum meeting

- Review harassment procedures and their effectiveness in relation to use of leisure centres and parks
  Racial incident and other harassment figures are collected by the police and by the Community Safety Partnership. The partnership is working on a number of initiatives and is led by the authority

Target:	**Establish reliable data collection of harassment incidents (race, gender and disability) relating to leisure centres and parks; implement within six months**
Specific	Yes
Measurable	Yes
Achievable	Yes in co-operation with other agencies
Relevant	Security important to improved take-up
Time-framed	Ambitious

Target:	**Establish reliable data collection of harassment incidents (race, gender and disability) relating to leisure centres and parks; implement within six months**
Specific	Yes
Measurable	Yes
Achievable	Yes in co-operation with other agencies
Relevant	Security important to improved take-up
Time-framed	Ambitious

Impact objectives and targets

- Raise awareness and knowledge about what facilities are provided through publicity campaign

Target:	**Raised awareness in BME and disabled groups (use of citizens panel and equality forum)**
Specific	Yes
Measurable	Difficult to measure
Achievable	Yes
Relevant	Core improvement target

Time-framed	Requires flexibility

- Increased confidence among BME people and people with disabilities about use of facilities

Target:	**Increased confidence among BME people and people with disabilities about use of facilities (Use of citizens panel and equality forum)**
Specific	Yes
Measurable	Difficult to measure
Achievable	Yes; but relies on other objectives/targets being met
Relevant	Core improvement target
Time-framed	Requires flexibility

- *Provide appropriate facilities with improved access*

Target:	**Specific range of access improvements (disabled access to both authority swimming pools; parks made safer for mobility and sight impaired people)**
Specific	Yes
Measurable	Yes
Achievable	Yes; but major financial implications
Relevant	Core improvement target
Time-framed	Requires flexibility

Target:	**Provision of opportunities for specific BME groups (Muslim women's swimming club)**
Specific	Yes
Measurable	Yes
Achievable	Yes; but financial implications
Relevant	Core improvement target
Time-framed	Requires flexibility

Outcome objectives and targets

- Increase in use of leisure facilities by adult BME people

Target:	**increase by (number, % per year to be tracked on three month basis). Requires monitoring procedure**
Specific	Yes
Measurable	Yes
Achievable	Yes; but relies on other objectives/targets being met
Relevant	Core improvement target
Time-framed	Requires flexibility

- Increase in use of leisure facilities by people with a range of disabilities/impairments

Target:	**increase by (number, % per year to be tracked on three month basis). Requires monitoring procedure**
Specific	Yes
Measurable	Yes
Achievable	Yes; but relies on other objectives/targets being met
Relevant	Core improvement target
Time-framed	Requires flexibility

- Increase in use of parks by BME people and women (especially with younger children)

Target:	**increase by (number, % per year to be tracked on three month basis). Requires monitoring procedure**
Specific	Yes
Measurable	Yes
Achievable	Yes; but relies on other objectives/targets being met
Relevant	Core improvement target
Time-framed	Requires flexibility

Increase in use of leisure facilities by people with a range of disabilities/ impairments

Target:	**increase by (number, % per year to be tracked on three month basis). Requires monitoring procedure**
Specific	Yes
Measurable	Yes
Achievable	Yes; but relies on other objectives/targets being met
Relevant	Core improvement target
Time-framed	Requires flexibility

Monitoring

A monitoring scheme and performance indicators and projections about time periods for change. In the example used, developing robust monitoring procedures will present a challenge. There will be practical and ethical problems with monitoring individual BME use of both leisure centres and individual and group use of parks. There will be practical and ethical issues with collecting data about disabled people's use. Innovative and transparent methods of measurement will need to be developed.

The following areas need to be considered:

Responsibility
We suggest that responsibility for monitoring be assigned to either the service delivery team or the team that carried out the Equality Impact Assessment/INRA.

Responsibility refers to oversight of:

	Example
Data collection at appropriate intervals	*application and allocation data is collected continuously. IT systems must be able to produce three month cumulative report broken down by equality category*
Organisation and presentation of data	*Data should be presented in easily accessible format; tables and graphs should be appropriate to data presented*
Presentation of monitoring reports to appropriate meetings/officers	A *three monthly monitoring meeting (agenda item at service management meeting) at which reports are presented and discussed*
Revising targets and action plans in line with objectives	*Trends are examined; reflection on changes in provision and uptake; Is publicity scheme working? Is action on harassment increasing confidence in use of leisure centres and parks*

Any monitoring scheme will need to be reviewed by

- An equality steering group or its functional equivalent
- A corporate equality group or its functional equivalent
- Stakeholders

Planning
Once responsibilities have been allocated the monitoring schemes should be properly planned. Consideration should be given to the following:

	Example
Specification of data collection	*The collection of application and allocation data will need modification to include ethnic, gender and disability categories*
At what intervals should data be collected? Should it be:	*Decision has been taken to report cumulative data on a three month*

Continuous Periodic (monthly, quarterly) Annual	*basis*
Allocation of resources	*Can the departmental IT systems cope with data collection and reporting. Will any updates cause delay in implementing action plan?*
Guidelines for data collection	*Anonymised summaries from individual application and allocation records for use of facilties*
Part of business/service plan review and management	*Reporting should be included as regular agenda item in business planning meetings*

Data collection

The intervals at which data is collected will depend on the nature of the target(s)that have been set and the level of the resource available for the task (subject to risk assessment). The deliberations/decision making process through which targets are set will have decided what are the appropriate/desirable intervals for data snapshots that will allow assessment of the performance indicator(s) and progress against targets..

In the example data collection has been modified to include equality information. In other cases arrangements may involve collection completely new data. More elaborate and detailed planning and resource allocation may therefore be required

When targets and related performance indicators are devised/set decisions will have to be made about:

	Example
What data relates to a performance indicator?	*Application and usage data*
What data sources will be used?	*Individual application and allocation records*
Security/confidentiality/data protection	*Reported data is aggregated; individuals cannot be identified form reports*

Reporting
A systematic reporting system for both data and review of trends should be implemented

	Example

Type of report and frequency	*Reports will present cumulative data for three month periods with comments on changes and trends where appropriate*
Who gets the report and how distributed?	• *Managers and appropriate frontline staff.* • *An equality steering group or its functional equivalent* • *A corporate equality group or its functional equivalent* • *Stakeholders*

Analysis and Review

	Example
What is being reviewed?	*Changes (increases from specific groups) in use of facilities; lower levels of harassment (decrease)*
Progress against targets	*Are the trends in use and incidents of harassment moving in the right direction?*
Do changes meet targets set at the beginning of the process?	*If specific numerical targets were set, Have these been achieved?*
Has the monitoring scheme collected reliable data.	*Has it , for example, been possible to ascertain the equality status of all users of facilities? If not what has been the problem?*
Does the action plan seem to be working?	*Has publicity about revised allocation procedures improved level of awareness of what is available*
Have the right objectives been set	*Is there real demand for existing and/or new developments among BME and disabled people?* *Does the authority know?*
Who is involved in the review?	*Managers, appropriate frontline staff, stakeholders*

Monitoring and self assessment

Effective monitoring schemes will provide the basis for self-assessment after Level 3 of the Standard. An authority that does not have a full-range of effective monitoring schemes as outlined above will not be able to get to Level 4.

Guidance Part 2
Implementing the Standard – Frequently Asked Questions

Implementing the Standard – Frequently asked questions

Part one of the guidance has dealt with the general principles of objective setting and monitoring. These principles can be applied to all the activities of a local authority and by engaging with them through continuous self assessment and review managers will become more confident about the process. However, consultation with local authorities has shown that they are having difficulty in applying these principles to all aspects of their work. This section of the guidance takes a number of common problems identified by local authorities and explains how these may be managed. The guidance has been organised around the following frequently asked questions.

FAQs

1) *What is the relevance of carrying out needs/impact/assessment in service areas where there is little or no equality relevance?*
2) *How do we apply needs/impact assessment to corporate services where there are no direct service users?*
3) *What are the requirements for pay review under the Standard?*
4) *What are the requirements for Local Labour Market Study under the Standard?*
5) *Do we have to complete INRA, objective setting and establish monitoring across the whole authority to achieve Level 3*
6) *How will the Standard be audited at Level 3*

Q) What is the relevance of carrying out needs/impact/assessment in service areas where there is little or no equality relevance?

A) All services and activities undertaken by a local authority should be re-examined through an 'equality lens' in order to establish whether there is differential impact for race, gender and disability and to see whether there are ways of developing 'good equality practice'. In some service areas there will be existing experience and knowledge but in other, sometimes technical areas this will seem unfamiliar. The principles of INRA can be applied to any service; any practice; any procedure. It may feel at first that there is nothing of relevance but by engaging with the equality standard over time, greater understanding, knowledge and sensitivity to these issues should be established.

The following example on refuse collection illustrates how needs/impact assessment may be applied in an area where a local manager began by arguing that there was no relevance.

A manager in refuse collection is carrying out a needs/impact requirement assessment on the domestic refuse collection service.

1. Selecting what to assess
There are no policy documents relating to the service and the Best Value review has only set out in general terms that the service provides a weekly refuse collection service to all householders in the borough. No further information has been identified in policy or strategic documents that clearly sets out the objectives of the service and the objectives in the current business plan are operational objectives that do not address the scope of the service. The aim of the impact assessment is above to determine whether refuse collection procedures have differential or adverse impact on groups within the community defined by race/ethnicity, gender, disability, sexual orientation, religious belief. The service manager aims to identify objectives that will promote good race relations and good equality practice within the borough.

2. Selecting the assessment team
A review team has been established consisting of:

- Service Manager
- Member of refuse collection team
- Equality Champion / Officer

3. Scoping

Defining the service

What are the aims and objectives or purpose of the policy or service?	To provide a weekly service to householders for the collection of general household refuse (modified to take account of public holidays) To provide the service through collections from wheeled bins to be placed on the pavement (or other agreed location) by the householder. To collect only refuse from the wheeled bins. To provide one wheeled bin per household within the borough (additional bins may be made available for large households)
Who implements the policy or strategy?	Service manager
Who will be affected by the policy and the way the service is delivered?	All households
What outcomes do we want to achieve and for whom?	• Equal and appropriate service for all households. • To employ and manage staff in accordance with the principles agreed through personnel and set out in the staff handbook
Are other organisations involved in delivery?	None: in house contract
What are the key performance indicators?	Record of completion of weekly and extra collections
What existing assessments are there?	None

Identifying equality issues

What do you know already about equality impact or need?	The current arrangements for wheeled bin collection may contravene DDA. Need to obtain legal advice.
Is there any evidence that there is	Possibility that some areas of

higher or lower take-up by particular groups?	terraced housing is less well served. A review of complaints suggest that most complaints from wards with highest levels of ethnic minorities and disabled people
Have there been any demographic changes or trends locally?	• The BME community and a higher than average population of disabled people live in a small number of wards.
Is there any indication that particular policies create problems for specific groups?	• Don't feel that the wheeled bin service is managed effectively in older housing areas with tunnel backs. Some comments from depot manager about areas of Asian housing. • Not sure how effectively the assistance scheme is working • The workforce profile shows very strong gender division. No women working in bin collection. Women are in a majority within administrative jobs but no women in supervisory/management positions. Low level of BME staff (0.5%)
Where can relevant information be accessed?	Central policy unit has demographic data (BME population 9%, declared disabled 9%)
Are there any equality objectives	• To provide an equal service to all households • To provide assistance where requested to the elderly and disabled to move the wheeled bins to the pavement (or agreed location) • To be an equal opportunity employer

Data collection

Data Type	Source	When?	Identify Gaps
e.g Complaints	Central Complaints system	Current	Not coded by race, gender, disability
Take-up	Not available		
Satisfaction rates	BVPI and survey through citizen's panel	From 2000/1	Not analysed fully for race/gender/disability
P.I's	BVPI survey		
Reality Checking	Not available		
Access Audits	Not available		
Census data	Demography 2001 census. Corporate Unit	Relates to 2001	Not sure about availability. Are there likely to be significant changes?
Benchmarking	Benchmarking with other local met. councils	Discussed service provision for best value 2001	No immediate information of relevance but general problem identified regarding access/disability and refuse collection
Results of consultation	Community Plan		Qualitative feed back
Workforce profile	Personnel		

Stage 6 : Consultation

Is there enough information from recent consultation to give you the information you require?	Very limited information. But, BVPI and other surveys: Show some dissatisfaction with wheeled bin collections. Considerable confusion about collection services at holidays (could this be a communication problem?)

Does the service have on-going dialogue with relevant interest or user groups?	Currently service is booked into the citizen's panel for a survey next year and we will use this to explore some of the issues raised above.

Depending on the existence or not of recent and reliable consultation results an authority needs to ask the following questions:

Who do we need to talk to?	In view of the possibility of problems associated with those areas of high BME population and disabled people, some consultation to be undertaken with community organisations/ voluntary sector to see if there is any further evidence of problems. Staff about service and employment issues
What groups or individuals have legitimate interests?	All households Current staff

Implementing the Standard – Frequently asked questions

How do we ensure that they are part of the consultation?	Provide locally based consultation Workplace consultation with staff to explore issues associated with the current staffing patterns, which persists regardless of EO employment practices.
What methods do we employ?	Invite small focus groups to look at problem
How do we make it accessible?	**Can use local community centres**
What resources are available?	**No resources written into business plan**

Analysis and objectives
The impact assessment shows that there are three specific areas that require further investigation and that equality objectives should focus on these.

- The assistance scheme for disabled and older people may not be working properly especially in the older terraced housing areas with tunnel backs

- The extra holiday collections, focused on the Christmas period, may not be catering for Hindu and Muslim celebrations

- The low level of women and BME staff in the service

Therefore the equality objectives for the service area will be process objectives, which involve carrying out systematic reviews of the above issues. It is possible that the first two review activities can be carried out within a single evidence gathering and analysis process.

Carry out a review of the assistance scheme to see if it is providing adequate assistance for all those households that need it.

Target:	**Carry out review and report findings within 6months**
Specific	Has specific aim
Measurable	Completion of review
Achievable	Support from manager and council; officer allocated part-time to complete
Relevant	Underpins service improvement planning
Time-framed	Specific completion date

Carry out review of needs for extra holiday provision in areas of high BME residence

Target:	**Carry out review and report findings within 6 months**
Specific	Has aim of identifying specific potential need
Measurable	Completion of review
Achievable	Support from manager and council; officer allocated part-time to complete
Relevant	Underpins service improvement planning
Time-framed	Specific completion date

Carry out joint employment review with human resources and central policy unit

Target:	**Carry out review and publish findings within 9 months**
Specific	Has aim of identifying specific barriers to women and BME recruitment and retention
Measurable	Completion of review
Achievable	Support from council; officer allocated part-time to complete
Relevant	Underpins improvement in employment practice planning
Time-framed	Specific completion date

Q)How do we apply needs/impact assessment to corporate services where there are no direct service users?

A service manager is carrying out a needs/impact requirement assessment on the Property Services service area.

Selecting what to assess
Property services has been selected for assessment in order to find out what impact its provision of an internal service to externally facing departments has on their public service delivery. No review of any kind of the impact of internal service departments on external service delivery has ever been carried out

Selecting the assessment team
A review team has been established consisting of:

- The Property Services service manager,
- Two other service managers (social services and education)
- The authority equality champion

Scoping

What are the aims and objectives or purpose of the policy or service?	• To provide and maintain as fit for purpose the local authority buildings in accordance with relevant legislation. • To provide (through contract services) an efficient repair service for council buildings • To provide cyclical repair and maintenance for council buildings • To employ and manage staff in accordance with the principles agreed through personnel and set out in the staff handbook
Who implements the policy or strategy?	Property Services
Who will be affected by the policy and	• All council staff

the way the service is delivered?	• Service users in public access buildings • Partnership organisations
What outcomes do we want to achieve and for whom?	Good working environment
Are other organisations involved in delivery?	External contractors
What are the key performance indicators?	None
What existing assessments are there?	None

Identifying equality issues

What do you know already about equality impact or need?	The main area where problems are anticipated relate to DDA where there are known problems.
Is there any evidence that there is higher or lower take-up by particular groups?	The problems associate with other areas of discrimination not felt to be high but the service may have unknown effects on other service areas. Therefore should be seen as high relevance**.**
Have there been any demographic changes or trends locally*?*	Growth in working age asian population There has been noticeable (but unmeasured) increase in Asian women staff employed by contract cleaners
Is there any indication that particular policies create problems for specific groups?	There are clearly identified access problems with a range of buildings There is anecdotal evidence that several small firms firm employed on maintenance work have a poor race equality record
Where can relevant information be accessed?	Property services records Employment records of contacting companies
Are there any equality objectives	To improve access to council buildings in line with DDA requirements

	To be an equal opportunity employer

Data collection

Data Source	Who?	When?	Identify Gaps
e.g Complaints	Central Complaints system	Current	Not coded by race, gender, disability
Take-up	N/A		
Satisfaction rates	Survey of service managers	1999	
P.I.'s	BVPI survey		
Reality Checking	Not available		
Access Audits	Not available		
Census data	Demography 2001 census. Corporate Unit	Relates to 2001	Not sure about availability. Are there likely to be significant changes?
Benchmarking	Benchmarking with other local met. councils		
Results of consultation	Community Plan		Qualitative feed back
Workforce profile	Personnel		

Stage 6 : Consultation

Is there enough information from recent consultation to give you the information you require?	Very limited information. But, BVPI and other surveys: Show some dissatisfaction access to council buildings
Does the service have on-going dialogue with relevant interest or user groups?	*None*

Depending on the existence or not of recent and reliable consultation results an authority needs to ask the following questions:

Who do we need to talk to?	At this stage consultation with service managers to identify potential problems associated with buildings and service provision. Contracting organisations about equality policy and practice
What groups or individuals have legitimate interests?	Disability groups Current staff Contracting organisations
How do we ensure that they are part of the consultation?	Provide locally based consultation
What methods do we employ?	Invite small focus groups to look at problem
How do we make it accessible?	Can use local community centres
What resources are available?	No resources written into business plan

Analysis and objectives

The impact assessment shows that there are two principal sets of issues to deal with:

- Improve the accessibility of council buildings open to the public (some of these are listed buildings)

- The equality policy and practice of external building and cleaning contractors

The property services department decides to conduct an accessibility audit for all its buildings to determine what access barriers there are for both the public and disabled staff. They further set staged objectives in relation to BVPI 156

The council intends to undertake an equality review of all its procurement and contracting procedures. Property Services will contribute to this review

Improve the accessibility of council buildings open to the public (some of these are listed buildings)

Target:	**Carry out accessibility review and report findings within 6 months**
Specific	Has aim of identifying specific accessibility issues
Measurable	Completion of review
Achievable	Support from manager and council; officer allocated part-time to complete
Relevant	Underpins accessibility improvement. Improvements under BVPI 156

Time-framed	Yes

Achieve 100% access to council public-access buildings

Target:	**Improve reporting under BVPI 156 by 25% for next four years**
Specific	Has aim of getting to 100% accessibility within four years
Measurable	Objective criteria for accessibility
Achievable	Support from manager and council; resources will be allocated within business plan
Relevant	Underpins accessibility improvement. Improvements under BVPI 156
Time-framed	Yes

Revise procurement and contracting procedures to contain equality clauses

Target:	**Revised procurement and contracting procedures; to complete within 9 months**
Specific	New policy document
Measurable	Production of policy document
Achievable	Support from CEO and council; officer allocated part-time to complete
Relevant	Underpins improved equality performance of suppliers and contractors
Time-framed	Yes

Implementing the Standard – Frequently asked questions

Q) What are the requirements for pay review under the Standard?

To achieve Level 2 of the Equality Standard an authority must have engaged with the pay review process and to achieve Level 3 should have conducted a pay review and be planning for equal pay adjustments. A pay review is a particular and specialised equality impact and needs/requirement assessment. Although it is primarily tended to provide the basis for adjust gender inequalities in pay, its findings may reveal inequalities on the basis of race/ethnicity and disability.

This section of the guidance consists of a brief introduction to the equal pay review process and a detailed case study (taken from the Greater London Authority)

The Local Government Pay Commission
The Equal pay criteria built in to the levels of the Standard are broadly consistent with the Equal Opportunities Commission Pay review toolkit and the recommendations of the Local Government Pay Commission.

The LGPC has devoted a whole chapter in its report to equality issues and says:

Equality in local government employment is a necessity not an option. In terms of regulation, local government employers have legal obligations in this area over and above those placed on all employers which encompass race, sex, equal pay, disability and will soon extend to other areas including age.
(**Local Government Pay Commission Report 2003** (p. 94)

The Standard sets out criteria for equal pay policy and its implementation for each level. These are set out in the table below.

Level	Criteria	Action
Level 1	• Commitment to establish a fair employment and equal pay policy	• Can the authority demonstrate commitment to formulating fair employment and equal pay policy, with detail of intended outcomes?
Level 2	• Develop fair employment and equal pay policy element of CEP • Engage in workforce profiling and an equal pay review	• Has work been done to develop a fair employment policy? • Has work on the equal pay review started? • Is the data on pay sufficient to enable an equal pay review to be carried out? If not, are plans in hand to ensure that data is being collected? • Does the comprehensive equality policy contain plans for workforce profiling and equal pay review?
Level 3	• Conduct an equal pay review and plan for equal pay adjustment • Start action on all employment and pay targets	• Has an equal pay review been conducted? • Are there plans to correct any pay inequality identified by the review? • Are there equality guidelines on pay e.g. on starting pay and pay on promotion • Has action started?
Level 4	• Report on implementation of pay	• Have reports been on implementation of pay review been compiled and scrutinised

	review recommendations	by stakeholders?
Level 5	• The authority can show that it is paying its staff equally for work of equal value • Complete human resource assessment of results of equal employment and equal pay target achievement. • Managers at all levels can demonstrate that full range of fair employment and equal pay objectives are mainstreamed as part of their professional practice.	• Does review show that it is paying its staff equally for work of equal value? • Have human resource assessment of results of equal employment and equal pay target achievement been completed? • Can the managers at all levels demonstrate that race equality objectives are mainstreamed as part of their professional practice?

There are no timescale/timetable problems at Levels One, Two and Three. Achievement of level 3 will require the completion of an equal pay review

Currently the recommendations of the LGCP are the subject of negotiation between local authorities and unions. It may not be possible to implement the recommendations of local authority pay reviews in the short term. Self-assessment validations and formal audits dealing with Level 4 and Level 5 achievement will take this into account.

Introduction to Pay Review

A pay review process is intended to provide a:

- Job evaluation, which determines:
- What constitutes like work within an organisation
- Where men and women are doing work of equal value within an organisation
- A review of existing the pay structure and grades to see if they match the job evaluation

The main source of guidance on equal pay review is the Equal Opportunity Commission's ***Equal Pay Review Kit***. The kit consists of a step-by-step guide to pay review together with detailed guidance notes.

The process consists of five steps which should culminate in either an Equal Pay Action Plan to redress demonstrably (and perhaps unlawful) pay differences or a

system of monitoring and review to ensure that an unequal pay structure does not develop.

Step One: Decide scope of review and identify required data

Step Two: Identify where men and women are doing equal work (job evaluation)

Step Three: Collect and compare pay data to identify any significant equal pay gaps

Step Four: Establish the causes of significant pay gaps and whether these are free from discrimination.

Step Five: Develop an Equal Pay Action Plan or monitoring and review scheme

Case study: the Greater London Authority

The GLA employed a consultant who undertook a pay review using the methods developed in the Equal Opportunities Commission Equal Pay Review Kit. The review investigated "the GLA's pay systems to identify if any pay differentials exist and the reasons for this." The review was carried out because

The GLA wishes to ensure that its pay systems reward people fairly for what they do and are consistent with the organisation's equality objectives. The GLA considers that an Equal Pay Review will support its aim to be an exemplar employer by assisting it to establish fair and equal terms and conditions for all its employees.(p5)

The review examined the pay systems for "work rated as equivalent" and "like work". These terms are explained in the following way:

"Work rated as equivalent" is where the jobs being done are different but considered to be of equal value or worth. "Like work" is where the work done by both a woman and a man with whom she is claiming equal pay is the same or broadly similar, and any differences, which do exist are not of practical importance. " (P5.)

The review was extended to cover ethnic and disability inequalities and involved:

- *Identifying where men and women (and black and minority ethnic and disabled staff) are doing equal work*
- *Comparison of pay data to identify any significant equal pay gaps*
- *Establishing the cause of any significant pay gaps and assessing the justification for these*
- *Consulting various GLA stakeholders including senior management, relevant specialist staff and trade union representatives.*

In relation to gender the review revealed:

There was under-representation at some of the lower and higher salary levels and that there was

"inconsistency regarding the payment of allowances, honoraria and recognition payments. Proportionately more men received these payments than women, and the level of payment varied considerably between the different types of remunerations. "(p.7)

In relation to ethnicity it showed that for most minority groups that there was under-representation in salary bands above 50,000 and again that:

There was inconsistency regarding the payment of allowances, honoraria and recognition payments in terms of ethnicity. More white staff received these types of payments than black and minority staff. Generally, the payments received by black and minority ethnic employees were lower than that of their white counterparts.

Consideration of pay for disabled staff showed that there no patterns of difference.

The GLA uses an analytical points based job evaluation scheme to determine salary level, which measures the relative size of jobs within an organisation using three criteria

Know How The total knowledge and skills developed by job experience, education and training, which are required to perform the job successfully.

Problem Solving The complexity of thinking required to perform the job when applying Know-How.

Accountability The positive impact the job has on the organisation and the constraint the jobholder has on acting independently.

The evaluation results in a points score. Although this scheme evaluates jobs and not individual characteristics: (p8.)

…there is a disparity between the balance of women and men at the higher salary levels and between white and black and minority ethnic staff at the higher salary levels. There is a disproportionate concentration of women and black and minority staff in the lower salaried positions within the GLA. (p8.)

These particular findings seemed to related to recruitment patterns rather than salary distributions to different groups after recruitment. This conclusion points to the clear relationship between fair pay and fair employment policy and practice and the development of an integrated strategy. This is reflected in the recommendations made at the end of the report which called for

- A pay structure that encourages staff development
- A pay structure that links to performance assessment
- A targeted recruitment scheme to improve representation of BME groups, women and disabled people at senior levels
- A targeted review of the recruitment systems of those directorates or divisions where there is a marked under-representation of women and black and minority ethnic staff.
- A review of a sample of earlier job evaluations and more recent evaluations to ensure consistency and compliance with the organisation's equality objective
- A systematic pay monitoring scheme; extended later to other equality groups
- monitoring
- A review of the payment of allowances, honoraria and recognition payments to ensure that such payments are not discriminatory.

The GLA action plan sets out to meet these recommendations. In particular the following have been or will be implemented or developed:

- *Proposals for a new salary scheme which addresses issues or under-representation at higher salary levels.*

- Plans for a focus on recruiting more women and BME staff to senior level posts, and on recruiting more Asian and disabled staff at all levels.

- *Plans to expand monitoring reports to include more detailed information on the issues raised in the equal pay audit, and will also provide comparative data to enable monitoring of progress has been made in these areas.*

- Analysis of information on the payment of honoraria and allowances by gender, ethnicity, disability and age. Procedures will be reviewed to ensure consistency. More information will be given to managers on the operation of procedures

- Review by human resources staff of recruitment systems across directorates to ensure consistency of approach, and to identify local good practices, which could be implemented elsewhere in the GLA.

- Proposals for carrying out a review of earlier job evaluations.. The review may include an element of external validation.

Information sourced from Greater London Authority **Report No. 6 to: Business Management and Appointments Committee**

What are the requirements for Local Labour Market Review under the Standard?

Local Labour Market Area

For the purposes of the Standard, Local Labour Market Area will be defined as its electoral/service delivery area. (There may be a justification in looking at a broader labour market area such as the travel to work area, however, the scope of the study area should be justified in terms of equality impact).

The LLMR should be designed to provide the basis for other assessments carried by an authority. Principally:

- It should provide baseline information to allow an authority to assess whether its workforce is representative of local communities. It is essential knowledge for developing fair employment policy and improving equal employment practice.

- It should provide information to allow the authority to perform a leadership role (in partnership) in improving skill and employment levels within its operating area. It should provide support for employment initiatives for authority's own recruitment, for promoting full-employment within the LLMA more generally and for promoting inward investment.

- It should review local employers and their condition and likely future within the local authority area (for example, dependency on transnational investment)

What should be assessed?

- Proportion of economically active people in each equality group
- Proportion of unemployed people in each equality group
- Skill and educational levels of people from each equality group

Current equality legislation as it relates to employment suggests that an LLMAA should take into account: ethnicity and/or race, gender, disability, age, belief and sexual orientation

The following performance indicators have been suggested by the IDEA and Audit Commission

ED06 - Unemployment rates of population of working age
ED07 - Long term unemployment rates
ED08 - Employment rates of young people
ED09 - Qualifications of school leavers

Some review issues

BME
BME unemployment is, on average, twice that of the white population. BME groups also differ markedly in terms of the three review criteria we are suggesting. There is important variation between BME groups (by group, by gender and by region). Also the interaction with gender produces some significant variation between BME groups. In addition, the interaction with gender produces some significant variation between BME groups. It is important for a local authority to determine what the local picture is.

Gender
Pay review has been pursued by the EOC in order to address longstanding and unresolved gender inequalities within pay structures. When considering gender inequality for the equality standard it is important to consider the broader picture of equal pay within local labour markets. This is particularly important in relation contracting out of work and in relation to agency working. It is also important for the local authorities leadership role within Local Strategic Partnerships and the broader community

Disability
Assessing the number of disabled people who want to work within a local government area is complex. Making the assessment is important so that a local authority can work out how many disabled people it should aim to employ. The DRC estimates:

… that 52% of people who would meet the definition of disability under the DDA do not consider themselves to be disabled. This causes a great problem in promoting rights under the DDA and ensuring that discrimination does not take place, because a large proportion of people who are in fact covered by the legislation are not aware of the fact that they are. The impact of this in the workplace is that disabled people may not ask for reasonable adjustments to carry out their job, and for this reason may be viewed as incompetent by the employer and dealt with under capability procedures. The same may also arise in relation to absences from work through disability related ill health, which is simply not identified as such **(DRC: Consultation on the Employment Act 2002)**

Example

Warrington Borough Council produces a regular Labour Market Review

The quarterly 'Warrington Labour Market Review' gives an overview of trends in Warrington's local labour market. The review regularly reports on labour market statistics for the local economy as well as bringing together information from the Borough Council and a number of other national and local business and research organisations. The review regularly includes:

- *National and regional business surveys*
- *Labour Market Statistics including for example employment and earnings*
- *Information on local skills supply, demand and training*
- *Unemployment Monitor*

For more information go to:

http://www.warrington.gov.uk/council/publications/lmr.htm