

## **Diagnostic report: West Wiltshire council for Wiltshire Improvement Partnership**

This report provides a diagnostic assessment of the position of West Wiltshire District Council on equality and diversity including the level of the Equality Standard reached.

### **A. The Purpose of Project**

This defined the task for Di Parkin, and her team: Graham Partridge and Caroline White (mapping) the IDeA Consultants as:

- An assessment of how authorities are currently performing in terms of the ESfLG
- Identification of action taken or underway to address weaknesses identified in inspection reports
- Identification of ongoing weaknesses in mainstreaming equality and diversity
- Identification of areas where joint working could be explored
- Target date for achievement of next level of Equality Standard, with action plan
- Mapping of Equality and Diversity Initiatives

### **Report structure**

1. The West Wiltshire demographic and economic context
2. Review of Documentation on equality
3. Evidence of staff understanding of and commitment
4. Level of Equality Standard reached

#### **1. The West Wiltshire context:**

Wiltshire is a southwest county covering 150 square miles; it is a predominantly rural area surrounding the market town of Trowbridge and the other towns of Warminster, Melksham, Bradford on Avon and Westbury, with a population of

There is a relatively large Moroccan population (the largest in Britain) and, as elsewhere a large, recently arrived Eastern European) population, who have joined an older population who have been in the area since the late 1940s

There are no wards within West Wiltshire in the top 10% most deprived in the country, but there are 2 wards within the top 25% most deprived. West Wiltshire is the most densely populated district in the county

## **2. Review of Documentation and practice on Equality**

This review examines crucial documents and policies on equality as well as other significant policies

### **2.1 Play corner**

The council has very good practice in the provision of a small play area in its reception. This has soft flooring and painted low walls with a gate, resembling a house, so that the children and toys stay in one place.

This practice is particularly to be commended for its contribution to gender equality, as the carers of small children are disproportionately female.

### **2.2 Translation and Interpretation practice**

There is a clear large sign in reception in a number of locally spoken languages explaining that translation and interpretation can be provided. It shows good thoughtful practice by suggesting that the person asks an English speaker to ring on their behalf to request, as the council is aware that staff will not be able to identify the language required, without this. The council took a specific positive action step of saying that Polish speaking would be an advantage in its advertisement for customer services staff. A Polish speaker was appointed and she on occasion goes out with other staff (e.g. development control and revenues and benefits) to provide translation. A list is also held of staff that speak a range of languages, as well as there being access to a telephone interpreting service

The council has learnt to its cost the importance of clarity in its signposting statement on literature. It previously suggested that a full written translation into any language could be provided, rather than the more effective offer of interpreting or translating what was required. Leaflets available in reception; e.g. on choice based lettings, clearly offer interpretation

### **Other documents**

#### **2.3 Commercial services business plan**

This, following the impact assessment process recognises the equality issues in assisted refuse collection.

Percentage

#### **2.4 Building Control business plan**

There is no equality monitoring of the customer satisfaction questionnaire, although including this is a priority action for 2006/7.

#### **2.5 Recruitment policy**

This good policy talks about increasing applications from minority and under represented groups; it might be useful to make reference to under representation

(e.g. of women) at particular grades or types of job and taking positive action to increase application, or training to encourage applications.

The guiding principles include reference to being free from discrimination, by which it must mean “unfair “ and “unlawful” discrimination; it also does not refer to the occasions where it may be a Genuine Occupational Qualification (or Requirement) to be from a certain groups. (the council say that they cannot envisage circumstances where this may be useful) It shows a good awareness of the importance of reasonable adjustments to employ disabled people and refers to holding equal opportunities forms for monitoring purposes, but not to the significance of analysing these forms in order to identify any discrepancy between percentages applying, short listed and appointed and justifying any positive action measures as above.

As with other Wiltshire councils we find this very thorough document to be one that sits somehow separately to the equalities initiatives. Thus the consultations on the Disability or Gender Equality schemes (forthcoming at the time it was written) are not referred to and vice-versa; it does not seem to be referred to in those schemes

## **2.6 Policy statement on equal opportunities**

This says that the council **aims** to ensure that no sector receives less favourable treatment; but the council, like anyone, has a legal responsibility not to discriminate, which it does mention later. However the policy does not refer to the positive duties to promote Race Equality (2002) Disability Equality (2006) and Gender Equality (2007) This policy does refer to positive action and talks about “targeting” information to ensure maximum awareness, but not about signposting translation (although this is practised).

## **2.7 Corporate Equality Strategy and Race Equality Scheme**

It states that the council “fully supports” the Race Relations Amendment Act, however it has a legal duty to comply with it. The legal framework of this document needs updating and should include reference to the Equality Standard for Local Government. In addition, in the section on partnerships it doesn't refer to the fact that the duties to promote equality on race, gender and disability devolve to partners (as is also required by the Equality Standard) saying they should “start to consider ways to promote race equality”. The section on complaints does not refer to monitoring complaints by equality category.

The section on harassment needs updating to include harassment on the grounds of gender reassignment

## **2.8 Statement of Community Involvement, LDF**

This clearly explains how the council involves and intends to involve the community; it describes the principles it follows, including the offer of information in other languages and formats and includes reaching out to black and minority ethnic groups for their “identity based” views. However (in Para 3.13) it surprisingly suggests that ethnic minority groups, such the Polish and Moroccans may not be “hard to reach” and it seems to skirt over the point that West Wiltshire, like many other rural districts will also have scattered and isolated numbers of other minority ethnicities (such as restaurant and take away owners) The report correctly identifies

older people as a “hard to reach “ groups, but does not correlate this with disability. In addition although the report frequently talks about people from “minority ethnic groups”; it does, on occasion slip instead into referring to “ethnic groups”

## **2.9 Procurement Strategy**

This very detailed strategy from 2005- 2008 makes no reference to Equal Opportunity. However it is a legal requirement under the Race Relations Amendment Act, the Disability Discrimination Act as amended 2005 and the Equality Act 2006 (re gender) to inform contractors that the positive duty to promote equality devolves to them. (It is also required under the Equality Standard). Thus it is necessary to ask them to necessary lawful questions, such as have they an equal opportunities policy, have there been any tribunal cases against them on equalities grounds and it is possible to exclude them from contracts if they don't reply to these questions or have not dealt with any matters where the tribunals found against them. In addition contracts, where relevant, should include equalities matters in the specification and check that the contractor is providing the appropriate service`

## **2.10 Community area plans**

We looked at some of these to assess the extent to which they recognised and integrated the diverse needs of Wiltshire's communities. We are aware that different partnership groups throughout the county produce the plans, but the council's role in mainstreaming equalities should mean more reference to the issue

### **Trowbridge**

The Trowbridge plan summary does say, “Welcome” in three languages, but doesn't say in those languages where anyone could get it translated. Also there is no sense throughout the plan that anyone in Trowbridge is different from anyone else and has diverse needs

In the fuller plan it refers to “ethnic communities” given that we all have an ethnicity, that of the dominant group being White British, it is preferable to refer to “minority ethnic” communities. The plan does recognise that there are diverse housing and leisure needs and access to leisure as well as to Arabic classes. It also refers to the need for” Better mobility/access for disabled people.”

However the full plan whilst signposting large print version, doesn't do this for minority languages.

## **2.11 Consultation**

Everyone (both within the County council and across the districts) it is said does equalities consultation separately and differently and there is a weakness in the failure to feedback the results of the consultations and what has happened as a result; there is a lack of follow through of actions proposed; an ongoing conversation was wanted

The Hidden voices report points out that Wiltshire does not have visible minority ethnic communities living in close proximity to one another. However both this report and the Buffer zone Community safety detailed qualitative consultations spoke with large numbers of individual BME people across Wiltshire. People were not aware of the existence of this report

## **2,12 Equality impact assessments**

These are done at service manager level, following briefing sessions. A simplified and clear template is used for a part one screening. There is an extremely clear, best practice flow chart of the stage one process It is excellent that the key action points

from this process are directly included, every year in service plans, which means equalities are fully mainstreamed into the work of the council. Every year progress against actions has to be reported. Sustainable communities have recognised the equalities issues in Leisure provision and Revenues and Benefits have identified the importance of targeting take up campaigns. Not all services have yet produced an EIA; for example Legal and Democratic services, where there are a large number of equality issues around access to elections for disabled people, also ICT have not yet done one.

The process followed is clearly very useful with most services including equality issues in their action plans. However it is regrettable that there is no template or process for part two full assessments. This puts the council out of compliance with the requirements of Race relations Amendment Act 2000, the Disability Discrimination Act as amended 2005 and the Equality Act 2006 (re gender) to publish complete equality impact assessments. In addition level two of the Equality Standard requires

“Demonstrate corporate engagement in an equality impact & needs/requirements assessment process”.

By level three of the standard there is an expectation that a rolling programme will be in place (as required by the Race Relations Amendment Act in 2002) sufficient to set targets in all equalities areas.

A full second phase approach might lead to services looking at issues of consultation and monitoring as well as having more focussed actions. Environmental health talks about ensuring communication with their (often diverse) customers and the need for plain English; however they don't refer to the need to signpost or provide translations. In addition Property and Estates don't refer to their responsibilities for DDA compliance in council property in their equalities section

### **3. Evidence of Commitment and knowledge**

#### **3.1 Leadership: Officer and Members**

People said that the Chief Executive was committed to the issue and had been a driving force to establish the WIP equality project. A lot of support was said to come from the Central Management Team (CMT) There is a an Assistant Director with overall responsibility for the arena and an excellent equality and diversity officer, based in HR, who is driving things forward. The Leader of the Council is the portfolio holder on equalities and is said to be passionate about equalities; there is a Youth and an Older Persons champion on Cabinet. There is a corporate equalities group.

#### **3.2 Staff views on Equalities in Wiltshire.**

This section is presented following a SWOT analysis; the questions being both at interviews and in focus group:

1. What do you perceive as Wiltshire's strengths on equalities?
2. What do you perceive as Wiltshire's challenges in this area?
3. What one thing would you wish to change

#### **Focus group**

##### **3.2.1 Strengths**

Two people accurately said that considering the context and the resources available to equalities work, the Council hadn't done badly and is providing proportionately appropriate services

There is a good programme of equalities training which is mandatory; it is followed up by a quiz to check understanding and there is a module within the induction programme, which is well received.

Staff mentioned the very good provision of advice by equalities staff and the well-trained new Customer Service team

There is good joint working with others; e.g. on the DES where the consultation day with the County lead to good feedback and recruitment of a disabled person in a key role.

Work placements for disabled people with both the Shaw Trust and Mencap

Two thirds of the chief Officers are women and just under half of Principal Officers are women; full time middle managers are equally likely to be male and female.

#### **Focus group**

- Training
- Reception play area
- Access for wheel chair users
- Private interview rooms
- Translation arrangements
- A good range of people in the Customer Service Unit
- Low level reception desk
- Hearing loop
- Lifts

- Wide corridors
- Disabled toilets
- Links to equality on the intranet
- Information provided on screen in reception
- Opening hours and general leaflets
- Someone with dedicated responsibility for equalities
- Conducting focus groups like this, consulting staff.

### **3.2.3 Challenges**

These were said to be getting service managers to understand and be inspired by the agenda; we concur with this view.

The corporate equalities group has not met for some time and it was said that different people tended to attend and there was not ownership of the work. There is no dedicated officer on equalities. And some felt it was difficult to find out the issues of concern.

There is a concern that equalities are not embedded into the CPA process, which makes it harder to raise its profile; it is often not on managers' radar.

In the middle manager group (equally female and male) there are 28 women who work part time and no men working part time. Junior staff are overwhelmingly female (60 out of 76) Of these 60 43 are women who work part time and 4 men work part time. The trend of women being more likely to work part time than men do, is likely to have the consequence of fewer women choosing to apply for more senior positions.

The removal of receiving cash payments was an issue particularly impacting on excluded groups such as the elderly or disabled people

### **Focus group**

- Software systems don't talk to one another which causes delays
- Focus can be on meeting government targets rather than on delivering a service
- Don't always get communication updates
- Telephone system out of date, hard for people to get through
- No facility for cash payments
- There is not much room to move in offices which makes it difficult for disabled people to get around
- Forms and guidance notes are all only in English
- There is no play area in planning reception

### **3.2.4 Key thing to change**

Training is not enough to lead to consistent engagement; the agenda needs to be included in performance engagement

Consistent working with others, knowing who the lead officers are, e.g. at County; there needs to be shared data and consultation.

#### **4. Level of Equality Standard**

The authority has reported at level two of the Equality Standard. However a (draft) gap analysis, waiting answers to some questions, reveals that level two is not yet robustly consolidated.

There are some minor issues of concern, giving an amber traffic light, but some areas where the light remains at red and further work is needed

(See appendix). These areas are:

Lack of part two template and complete process of full screening; not yet a clear structure for monitoring outside HR.

It is suggested that the report at level two stands and the consolidated work to redress these issues is completed in the next few months, allowing a target for reaching level three during 2008

#### **5 Conclusion**

This authority has many examples of excellent practice on equalities. It has managed to engage many service managers with a version of the equality impact assessment process, which means that most services have included equality issues in their service plans. However the impact assessment process needs to be completed by establishing a stage two full template. There are service managers who have not engaged with the issues and some areas of work where equalities have not been mainstreamed. The authority has also good on the ground real practice in relation to both translation and interpretation and in the play corner in reception at the council offices.

Di Parkin May 6<sup>th</sup> 07