Corporate Guidance on Equalities Monitoring of Public Services

1.   Requirements of the Public Sector Equality Duty PSED – section 149 of the Equalities Act 2010

1.1   As equalities legislation develops there is a growing requirement to carry out equality analysis of our services. It is difficult to demonstrate that equalities duties have being met if monitoring data is not available or robust. So, although the legislation does not say you must produce equality monitoring data in service delivery, it is very difficult to see how we can fulfil our equality duties without such data. Monitoring results provide us with a benchmark for future planning of services against which progress can be measured.

1.2   The Equality Act 2010 brought together previous equality legislation and strengthened and extended areas. The Public Sector Equality Duty (PSED) came into force in April 2011.

1.3   The PSED requires public bodies to consider, and have due regard to the needs of diverse groups in a proportionate and relevant way, when designing, evaluating and delivering services in order to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act (2010);
- advance, not merely promote, equality of opportunity for persons who share a relevant protected characteristic compared to persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.4   **Due regard** is about taking into account and giving weight to different needs of protected groups in relation to the three aims of the duty. It is about addressing and preventing disadvantage for any protected group and taking the opportunity to promote equality and good relations where possible**.**

1.5   **On-going Monitoring for Impact: Public sector equality duty** is an on-going duty. Equality monitoring analysis information will enable us to assess and evaluate impacts and needs of diverse groups as an on-going activity and thus is integral to an effective implementation of our statutory and policy equality and diversity commitments. On-going monitoring for impact can draw upon a range of information, including complaints, user feedback, survey results as well as equality monitoring analysis.

2.   Requirements of an excellent authority delivering excellent EDI practice

2.1 The 'Excellence' status of the Equality Framework for Local Government states that all services using information systems to monitor service outcomes need to ensure that service delivery monitoring reports are produced at specific and regular intervals and findings reported on, at least on an annual basis.

2.2 Although we have some excellent practice in place within the various housing management agencies and within HR/employment, there is more work to be done to ensure key CWC public services also undertake effective equalities monitoring of services.

3.   The business case for equalities monitoring of Public Services

3.1 <u>What is equalities monitoring</u>

3.2   Equality monitoring involves the collection of information about customers and staff. It is a very important part of tackling inequality and discrimination. It will help us to check whether the services we provide are meeting the needs of all our local communities.

Data to be collected should include details of a customers protected characteristics, this to include:

- Age
- Disability
- Gender
- Race
- Religion or belief
- Sexual orientation
- Gender reassignment / gender identity
- Marriage and civil partnership
- Pregnancy and maternity

By collecting monitoring information, we will be able to provide evidence that we are reaching the people that need particular services and identify when we are not. It can help us identify barriers to services and areas for improvement. Equality monitoring by itself does not explain why a service is under or overused by some people. It provides a starting point for highlighting issues. This enables us to set realistic targets on how we can improve services to make them more inclusive.

3.3 Monitoring people by equality groups is an essential tool in being able to identify inequalities. Findings of data analysed will enable us to take action to reduce and eliminate differences in service take up, service usage, service outcomes experienced by different groups of customers, potential customers and employees.

3.4 <u>Why monitor services?</u>

3.5 Without equality monitoring we would lack the diagnostic tools required to identify with who our customers are? Who is or not using our services? How satisfied are different groups of customers? What outcomes are different groups experiencing?

With this information we can plan and inform appropriate service developments and improvements that will close the gap for our diverse customers. Therefore, equality monitoring is an important diagnostic tool and necessary for effective service planning.

3.6 Contrary to the common assumption that service users will be opposed to monitoring, many service users/job applicants now expect monitoring to happen and will take it as a positive sign that we are improving our equalities and service practice. Of course, some forms of monitoring are more established than others and staff will need to be equipped to answer any queries and objections about equality monitoring, especially some newer forms of monitoring such as sexual orientation or religion or belief.

3.7 <u>What should we monitor:</u>

We will need to prioritise which service areas of our services we need to monitor   and consider the following when doing so:

- the time and resources needed to collect the data against how useful the data will be
- what benefits it will yield in terms of service planning/improvement
- There will also be the issue of relevance to consider. Will the data provide valuable information, which will support the development and review of services, employment policies or council wide strategies, projects and initiatives
- The nine equality strands as indicated in 3.3. (where relevant and appropriate)

3.8   Data needs to be collected on all nine equality strands - Please refer to appendix one attached for a model form.

The following questions can be used to assess how relevant services/functions are to each of these strands:

- Is there evidence or reason to believe that some racial groups, women or men, groups of disabled people, people with different religions/beliefs and people of different sexual orientations and gender identity could be differently affected?
- Which groups are affected?
- What evidence is there/how much evidence do you have?

- Is there any public concern or perception that functions/policies are being operated in a discriminatory manner?

3.9   Methods of Monitoring

Through a questionnaire. This is the most common form of data collection. Questions about a person's equalities profile are included in the main questionnaire/application form allowing whatever data is collected to be aggregated and disaggregated by equalities group. Examples are: job application, customer satisfaction surveys, council tax benefit applications, citizen's panel questionnaires.

Sampling. If the data is needed only as a snapshot of the customer group the data may be collected anonymously with no link being made to the individual, eg, employee survey, face to face customer satisfaction survey. This will limit analysis to a snapshot which may be repeated for comparison at regular intervals but will not allow tracking of individuals and groups through a service or employment process.

In some cases, you may be able to collect enough data through a sampling exercise. This could be a more cost-effective way of profiling your customers and their satisfaction. However, you will have to ensure that the sampling is representative and has not been skewed by an external or seasonal factor. An example of this type of sampling is the 24-hour sampling of people seeking services because of domestic abuse which is carried out nationally one a year. Other examples could be users of a sports centre over a one-month period rather than an exhaustive monitoring of every single service user entering the building.

Face to face or telephone monitoring. In some cases, answers to a questionnaire are recorded over the telephone or in a face-to-face survey. It is again important that staff explain to the respondent why the questions are being asked and what data will be used for (guidance for staff please contact the equalities team.

3.10   In summary, the analysis of equalities monitoring data will help to:

- Highlight inequalities in service take up, service usage, service outcomes
- Investigate the causes of inequality
- Take appropriate action to reduce and remove inequalities, resulting in service improvements.
- identify policies, practice and services which negatively affect people from different communities
- reveal discrimination
- identify access issues and barriers to services
- evidence the need for new or amended services
- set realistic targets on how to tackle the issues
- review service delivery

- measure the effectiveness of service changes
- show the under or over-representation of a service by a particular community
- reveal trends and patterns of concern and indicators of possible discriminatory impact

Equality monitoring is central to ensuring that we continually improve our service delivery by enabling services to know who their customers are, look at possible diverse needs and barriers to equal access. Equality Monitoring importantly helps to ensure that our customer base is representative of the wider population.

4. Council Policy

4.1 Effective equality monitoring will help us evaluate our implementation of the Council's EDI policy.

4.2 By appropriate and relevant monitoring, the Council can determine how well policies promote equality, whether there are levels of discrimination and how effective our employment or service delivery is in relation to the different equality groups.
Critically, if we cannot measure or evaluate what we are doing, how can we effectively manage and ensure that we are meeting diverse needs?

It also allows the council to show:

- our services are delivered in a fair and equal way to all our customers

- that customers who use our services are not further disadvantaged because of the way we deliver our services

- how to shape new and existing services around customer needs

- a generally increased understanding of the needs of non-users and our residents

- find out whether customer satisfaction rates vary between different communities.

4.3 Monitoring is more than just data collection

It is important to regularly analyse and question the equality monitoring data, then follow up and tackle any barriers or failures it has highlighted. If information is just collected and not analysed it is a waste of time.
Equality monitoring is a tool for the council to analyse the use and experiences of service delivery by different groups of people and, where necessary, to take appropriate action to improve those services. It is most useful when it is incorporated as part of a survey or consultation.

4.4 <u>Other issues to consider</u>.

There is a need to be aware that some respondents, e.g. LGBT employees and service users, disabled people, people of different faiths may be particularly concerned about confidentiality in relation to how the data will be stored and used. Even when using anonymous data collection care should be taken to reassure people that the data will be treated carefully and sensitively. It is important to ensure that secure systems for storing data are in place to ensure that there is no risk of data misuse or breach of confidentiality.

Appendix One

Equal Opportunities Monitoring – Service Delivery

Under the Equality Act 2010, the Council has a responsibility to ensure that we do not unfairly discriminate in the services we provide. In order to help us ensure that our Equal Opportunities policy is working, would you please provide the following information by ticking the appropriate boxes. **Providing this information is optional, and any information you provide will be treated in the strictest confidence and will only be used for statistical monitoring, to help ensure our services are accessible and remain responsive to everyone.**

Gender Are you;

Female ☐ Male ☐ Gender Neutral ☐ Gender Fluid ☐ Prefer not to say ☐

Gender reassignment / gender identity

Is your gender identity the same as the gender you were assigned with at birth?

Yes ☐ No ☐ Prefer not to say ☐

Ethnic Origin Are you;

Asian*		**Black***	
Indian	☐	African	☐
Pakistani	☐	Caribbean	☐
Bangladeshi	☐	Other Black	☐
Chinese	☐		
Other Asian	☐		

White

British ☐
Irish ☐

Dual Heritage	*	Gypsy/ Irish traveller	☐
White and Black African	☐	Other European	☐
White and Black Caribbean	☐	Other White	☐
White and Asian	☐		
Other Mixed background	☐		

Other ethnic group*

Any other ☐
Prefer not to say ☐

Disability

Do you have a disability which affects your day to day activities, which has lasted, or you expect it to last at least a year?

Yes ☐ No ☐ Not Sure ☐ Prefer not to say ☐

Sexual Orientation Are you;

Lesbian/gay woman ☐ Gay man ☐ Bisexual ☐ Heterosexual/straight ☐ Unsure ☐
Prefer not to say ☐

Religion Are you;

Buddhist ☐   Christian ☐   Hindu ☐ Jewish ☐ Muslim ☐   Sikh ☐ No Religion ☐   Any other religion ☐   Prefer not to say   ☐

Age: Please indicate how old you are:

Under 16 ☐   16 – 24 ☐   25 – 34 ☐   35 - 44☐   45 - 54☐ 55 - 64☐   Over 65 ☐

Please note:

Details relating to **marriage and civil partnership** would be extracted from the personal data provided at the beginning of any service enquiry/request e.g. name and title and address.

Further details relating **to pregnancy and maternity** would only be collected if appropriate and relevant to the service enquiry/ request

Thank you