What is the RACE Code?

- The Race Equality and its accountability framework is designed to provide organisations across all sectors and sizes, the opportunity to address inequality within Governance and Senior Leadership Teams. The RACE Code is issued and supported by the Governance Forum.

- The independence performance framework examines organisational culture, policy and practice to determine whether appropriate governance structures, systems and reporting arrangements are embedded in place to address the underrepresentation of Black and other ethnic groups in the senior leadership team.

- City of Wolverhampton have been in conversations with Karl George MBE since January 2022 .

Reporting → commitment to be transparent and disclosed information and updates on the progress of Race Initiatives

Action → a list of measurable actions and outcomes that contribute to and enable a shift in the organisation's approach and success in delivering change

Composition → Identifying key indicators that will make a real impact over the long-term, creating tangible different to the existing landscape around race diversity of the board and senior leadership team

Education → Developing a robust education framework that develops the ethical and moral reasons behind a programme of development for every organisation.

Who is Karl George MBE

A thought leader and internationally established consultant in governance. He is a Partner and head of Governance at RSM professional services firm. Working with boards and senior executives in the private, public and voluntary sectors to develop or redefine their corporate strategy, improve how high performing boards operate and implement effective board behaviour. He has over twenty years' combined experience in accountancy, business and strategic development.

Karl is a qualified accountant and Fellow of the global international body for governance practitioners ICSA: The Chartered Governance Institute. He has developed a unique governance framework and quality mark that was endorsed by the late Sir Adrian Cadbury.

Stage One : Pre Assessment Process
(Documentation Submission and Review including Staff Survey – Completed 1st November 2022)

Whilst the Diagnostic Document Review (DDR) was not a formal document review against any legal or regulatory requirements, the process of reviewing Wolverhampton Council's documents, was to purely focus on where or how race was embedded into its strategic documentation, and review Equality, Diversity and Inclusion documentation and practice. 64 Documents submitted

Alongside this process, the purpose of the survey was to start to get an understanding of the culture and leadership empathy, around race equity and representation of Black, and other ethnic groups on Wolverhampton Council's senior leadership team. 24 out of 33 completed the survey(73%)

Stage one of the assessment process was completed and submitted to The Governance Forum on 1st November 1st November to evidence and seek assurance of the systems employed in governing the organisation, and the impact on diversity and inclusion.

They examined
(a) Resources - The documents that describe the governance framework.
(b) Competency - The composition and capacity of the leadership and (c) Execution - The work carried out in ensuring accountability of the senior leadership.

Key Strengths from Report

Strong Corporate EDI Strategy "key objectives outlined"

Senior executive board and its governing structures have good accountability for Race

Strong commitment to grow diverse talent

Taking positive action to improve pay gap reporting rates and collecting of data.

Clear evidence of regular reporting against corporate EDI Strategy

Genuine authentic culture and approach – to do the right thing

The Council are capturing relevant data required to report effectively on racial diversity

Moving from being data aware, to being data driven

Strong organisational development programmes and opportunities in place

Clear evidence of publishing information on racial diversity

Formal Staff engagements networks including Race, Religion & Belief in place and are involved / engaged in decision making at every level

Clear accountability and ownership of executive sponsors for race and accountability in governance.

Strong evidence available to ensure all element of rewards and recognition are fair and reflect the racial diversity.

Include diversity objectives and in particular race objectives in appraisal process and professional conversation

Clear evidence of formal and comprehensive interview processes in place for all job roles.

Robust employment policies in place demonstrating a firm commitment to race quality with revisions to ensure diversity in panels

Equality Diversity and Inclusion (EDI) Team

wolverhampton.gov.uk/EDI

Statement from Dr Karl George

"The Council is evidently working hard towards achieving the Race Equality Code Quality Mark."

" Our initial assessment found a robust governance structure, a strong corporate EDI strategy and supporting objectives, actions that we consider very likely to move the dial extensively on race equality.

A real strength was the commitment and unified approach of the leadership team to address challenges. They recognise there is work to be done around representation in the leadership team and ways to improve this were discussed readily and openly. There is recognition that the change in leadership – and therefore the culture – has had a positive impact on the organisation's approach to equality; this has been well received – and there is an understanding there is more to do in continuing to embed that change, particularly over the next 12 to 18 months". This requires work around continued accountability, putting the right communications in place for all stakeholders and, importantly, continue their resilience to follow through on commitments made."

"TGF have been able to benchmark the actions taken by the Council against our RACE equality methodology. CWC have scored very highly and are therefore ready for the next stage of development."

Stage Two .... Self Assessment

'Council has submitted ......06th March 2023 – a commitment statement setting out the actions the council will take to deliver against the four key governance principles.

Reporting → Our statement will describe our commitment to gather appropriate data and publishing it to demonstrate accountability. Are we happy with how our organisation reports on race, is information transparent and accessible by all stakeholders?

Action → our statement will describe how we have developed appropriate actions and determined who is accountable within the overall inclusion agenda. Are we satisfied that the actions our organisation are taking are robust enough to make a real difference to race equality and that the council is accountable?

Composition → our statement will describe what data we will be collated and how success will be measured. has our organisation gathered the appropriate data. Are we satisfied with the targets that your organisation have decided upon, and that they are challenging enough?

Education → Our statement will describe how all stakeholders will be educated around race and the commitment to creating an inclusive and belonging environment . Are we confident that we confident that we have considered how our organisation will educate staff at all levels of the organisation and all key stakeholders that work with our organisation and all the key stakeholders that work with us around race equality ?

Stage Three .... Self Assessment

Council have completed a further self- assessment against the 54 provisions of the RACE Equality Code and supporting actions against the Must, Could and Should priorities .

Undertaking self -assessment against the **12 Must provisions** which we as an organisation must comply with and complete and submit details of where there is partial or non-compliance and apply, explain and confirm compliance **by 10th February 2022.**

Undertaking self-assessment against the **Should's and Could's** , which make up a further **42 provision's** and complete and submit details of where there is partial or non-compliance and confirm compliance **by 10th February 2022.**

Progress meeting planned for 23rd February with Dr Karl George – to receive recommendations on areas for improvement to shape the councils (RAP) Race Action plan moving forward

CWC awarded the Race Equality Code Quality Charter Mark – 08/03/23

- The Governance Forum have verbally confirmed 08/03/23 that City of Wolverhampton Council have secured the Race Code Quality Charter Mark .

- We will now formulate the Race Action Plan and incorporate into the Councils existing EDI Strategy .

- Look to share RAP with Scrutiny June 2023

Ethnicity Pay Gap Reporting

Resources and Equality Scrutiny Panel

16 March 2023

CITY OF
WOLVERHAMPTON
C O U N C I L

wolverhampton.gov.uk

Purpose

- To provide Resources and Equalities Scrutiny Panel with an update following the ethnicity pay gap report presented in June 2022.

- To seek further feedback on proposed changes

Background

- Feedback provided by Resources and Equalities Scrutiny Panel in June 2022 has been used to improve the ethnicity pay gap report for the 2022 reporting period.

- The Office for National statistics (ONS) defines ethnicity pay gaps as 'the difference between the median hourly earnings of the reference group (white or white British) and other ethnic groups as a proportion of average hourly earnings of the reference group'.

- It is recognised that any one term used within the ethnicity report will not be agreeable to everyone. The report has adopted the terminology recommended in the Councils 'inclusive language' guide – based on the UK Governments preferred style of writing about ethnicities [Writing about ethnicity](#).

Proposed changes

- Government guidance since 2021 states ethnic minorities includes white minorities, such as Gypsy, Roma and Irish Traveller groups. The report will now include a table showing ethnicities and how they have been grouped according to guidance.

- Include information on ethnicity related key performance indicators and the councils progression in relation to these over a given period. This will provide readers with information about ethnicity related change in council jobs compared to the city population including positions at grade 10 and above.

- Include information on factors that can affect the pay gap to ensure readers understand what the council can realistically achieve in terms of change and where we may have little immediate control (such as factors affecting national recruitment and retention and socio-economic reasons affecting ethnic minority groups).

wolverhampton.gov.uk

Actions undertaken to support equality of opportunity

- Diverse panel requirements across all panels including recruitment and selection

- Specialist advertisement of senior job roles/removal of artificial barriers

- Wider promotion of Equal Opportunities

- Launch of WV Jobs website

- Improve reporting of protected characteristics

- Analysis of advertisement media and applications received

- Digital inclusion project

- Collaborative working with Wolves at Work 18-24 year olds

- Policy reviews

- Bereavement Support Guide

- Organisational Development Initiatives

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Future actions undertaken to support equality of opportunity

- Review of diverse panel impact – discipline, grievance and management of attendance

- Understand in more detail why employees leave the council

- No offence training delivery to frontline services

- Survey to shortlisted candidates not successful following interview

- Review of secondment policies

- Diversity recording survey to be sent out via gov delivery for frontline services

- Continue to review senior management recruitment actions vs impact

- Introduction of recording advertisement channels to understand media that attract diverse candidates

- Continue to review/remove artificial barriers and 'grow our own initiatives'

Timeline for Ethnicity Pay Gap report (2022)

Report – final draft
24 April 23

Strategic Executive Board
2 May 23

Cabinet Member Briefing
31 May 23

Equality Advisory Group
13 June 23

Staff Equality Forums
July/Aug '23