Royal Borough of Kingston Upon Thames: Race Equality Scheme:

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Introduction by the Chief Executive

This document outlines Royal Borough of Kingston’s Race Equality Scheme, as required by the Race Relations (Amendment) Act (RRAA). It should be noted that in developing this scheme, while following the legislation and the spirit of the RRAA and race issues specifically, we plan to extend the approach taken to other equality areas including disability and gender, as well as age, sexual orientation and religion. This forms part of our strategic approach to equality. The attached scheme includes:

- Our vision and values
- Our approach to racial equality and equality generally
- The legislative framework
- Functions and policies, including: assessment and consultation. monitoring arrangements; access and information provision.
- Employment Duties.
- Dealing with complaints.
- Procurement, funding and working with partners.

The scheme complements our ‘Equal Opportunities Policy Statement: Putting People First’. This emphasises that the Council services and jobs are open to everyone. We see equality as a fundamental part of our aim of putting people first in order to ensure that the Council is accessible and responsive to all. The Race Equality Scheme (RES) will now be an integral part of this approach.

The Scheme will be subject to discussion and consultation as will our continuing evaluation of progress made on this scheme and equality generally. A summary of the scheme will be available from Council offices and libraries.

Bruce McDonald
Chief Executive
**Our Vision and Values**

The Royal Borough of Kingston is a London Borough situated in South West London with a population of nearly 150,000. Our population is diverse and reflects multi racial U.K. today with an ethnic minority population estimated at currently 13.8%. More accurate figures will be available next year from the results of the 2001 Census. Our diversity is reflected in the number of languages spoken in the borough, with the main ones, apart from English, including Hindi, Urdu, Gujarati, Tamil, Arabic, Chinese, Bengali and Korean.

Our vision and commitment is to work to create the best opportunities, services and environment for the people of Kingston. These values have been developed in consultation with communities living in Kingston and Council staff. The values have also now been developed into a detailed programme of work which is built around six strategic aims:

- Working in Partnership
- Caring for the Environment
- Putting People First
- Enhancing Quality of Life
- Developing Education and Lifelong Learning
- Providing Best Value

Underpinning this approach is a commitment to an action programme to ensure that all communities have the opportunity to be consulted on and make an input to our policy programme. An important part of this is the development and progression of a community plan, which aims to identify themes and issues which people are concerned about. This is subject to extensive consultation, where we are working to ensure that all communities, including hard to reach groups have an active involvement.

One of the key objectives in the Councils Policy Programme is to ‘be a Council which celebrates diversity and practices equality in everything we do, in providing or commissioning services, and as an employer.’
RBK has a comprehensive equal opportunities policy: ‘Putting People First’. This reflects the work we have already developed on race equality, including the Council’s Stephen Lawrence action plan and related work. This Race Equality Scheme is now an integral part of this policy and complements it.

In summary, our policy means that Council services and jobs are open to everyone, and we aim to ensure that information about these services and jobs is available in a form that is easily understood.

We recognise that in order to ensure fairness, action may be needed to overcome prejudice against some groups of people. We are aware that some people are more likely to experience prejudice than others. Women, black and Asian people, and disabled people are commonly disadvantaged; others, such as gay and lesbian people can also experience prejudice.

The principle behind our approach is:

‘Services offered should be relevant to the needs of the local community, reflecting (where appropriate) the diversity of its religious and cultural heritage, advertised in a readily understandable format avoiding jargon and wherever possible developed in partnership with local people.

Services will be provided on the basis of fairness and openness. No one will receive less favourable treatment because of their race, nationality, colour, ethnic or national origin, religious belief, sex, marital status, sexual orientation, age or disability’.

A similar set of principles are in place with the Council as an employer:

‘All employers will be recruited, training and promoted on the basis of ability, the requirements of the job and similar relevant and objective criteria. No employee or job applicants should receive less favourable treatment on the grounds of race, nationality, colour, ethnic or national origin, sex, marital status, sexual orientation, religious belief, age or disability in any matters to do with employment.’

Our policy provides more detail in relevant key areas, and is concerned with ensuring that our approach and principles of equality are delivered in practice. In summary, these include:

- Ensuring our services are accessible and responsive to all users and possible uses
- Ensure we reach all sectors of the community, including for example, providing specialist services that may be required to meet the particular needs of a group of residents or in consultation with them.
- Continue to promote building design that ensures physical accessibility, in line with disability discrimination legislation.
- In terms of resources and planning, and taking account of scarce resources, ensuring that equal opportunity considerations remain a continuing priority with, where appropriate, targeting services to ensure that the needs of specific groups are met.
- Consulting with and involving local people in decision-making, including hard to reach groups.
- Working with community agencies and statutory agencies such as the NHS and police, to ensure that obligations under relevant equality legislation, including the RRAA, are carried out as effectively as possible.
- Working to increase public participation in the local democratic process, and ensuring that the views and voices of all communities in Kingston are heard. An important part of our equal opportunities framework is that it helps potentially to highlight any barriers, experienced by some groups, which may prevent their involvement in the processes of local decision making.
- As an employer, the Council has taken steps to ensure that all employers are recruited, trained and promoted on the basis of ability, the requirements of jobs and similar relevant and objective criteria. A number of other steps have been taken to ensure that
the Council is a fair employer and also to develop equitable systems in terms of selection, work arrangements (including work life balance arrangements), working environment (including ensuring it is free from harassment and bullying).

- Finally with the policy, clear responsibility guidelines are laid down in respect of management and employee responsibilities. These are concerned with ensuring that the equal opportunity policy is delivered in practice, as well as practical arrangements being made on co-ordination, monitoring and evaluation. Other important areas include the areas of training, communicating the policy to staff and the public, and dealing with complaints.

**Stephen Lawrence Action Plan**

Race forms an integral part of our corporate policy on equality and this policy underpins and complements this race equality scheme. In terms of specific work on race, in the light of the Stephen Lawrence inquiry and the Government response to this, the Council developed their own Stephen Lawrence action plan. This included:

- A review of, and production of a revised equal opportunities policy.
- Development of equal opportunity policies and relevant systems for each department.
- A number of steps being taken to develop and progress programmes of monitoring in various parts of the Council, especially in respect of service delivery.
- The introduction of a number of initiatives to provide information in relevant languages, and also the provision of better translation facilities where appropriate.
- Further steps were introduced to deal effectively with racist graffiti.
- A number of initiatives taken in relation to staffing issues, including improving monitoring information, and relevant training provision.
- Reviewing and revising the racial incidents policy, along with a number of new initiatives developed with a range of ethnic minority groups.
- Reviewing race guidelines developed for schools as well as the development of action plans and targets for ethnic minority achievement in schools.
- Improved monitoring of racial incidents at schools across the borough.
- Working as part of the Crime Disorder Reduction Partnership in carrying out the three yearly crime and disorder audit. This will include consultation and visits with a range of ethnic minority and Faith communities to ensure that their views are included as part of the audit.

Further details on some of these areas are contained in other parts of the scheme, as well as in detailed action plans that accompany this scheme.

**Making the Scheme happen**

Ensuring that the Race Equality Scheme is effectively coordinated and monitored and relevant lessons learnt in conjunction with the Council’s corporate and strategic approach to equality is an essential part of our Scheme. The mechanisms already developed for the overall approach to equal opportunity will be utilised for this purpose. This includes:

- The Scheme, as an integral part of the Council’s approach to equal opportunity, will be part of the portfolio of the Leader of the Council. Overall scrutiny will be provided by the Strategy and Resources Overview panel of the Council. An annual report on the progress of the Scheme will be produced for this group, as well as progress on the Council's equal opportunities policy. In terms of the detailed areas of the Council’s operational work on race and equal opportunities, for example in respect of education and housing, this will be the responsibility of the Council’s various decision making bodies.
- The Chief Executive and Directors have the management responsibility for ensuring that the equal opportunities policy, and now the Race Equality Scheme, are implemented across the Council, and within individual departments. In addition to the corporate policy and approach, each directorate has their own equal opportunities statement, and steps have been taken for all directors to have effective monitoring arrangements in place to monitor progress. This will now also take account of the Scheme.
The Council has also set up an Equal Opportunities Forum. This comprises representatives from directorates, staff side and the voluntary sector. Its function, in addition to consideration of service provision issues, is to advise on policy and promote good practice in relation to equality of opportunity. The Equal Opportunities Forum is the coordinating body for the equal opportunities policy, and will report as appropriate to directors, the Strategy and Resources Overview Panel, and the Executive.

**The Equality Standard for Local Government**

As part of the Audit Commission’s performance indicators, and best value indicators, the Council has, until recently, measured progress made on equality against the Commission for Racial Equality (CRE) standard. The standard covers such areas as policy and planning, service delivery, customer care, and community development.

A new standard has now been developed that incorporates progress on equality, not just race, and replaces the CRE standard from this financial year (2002-2003). The standard has been developed by the Equality Commissions, the Local Government Association and the Employers Organisation. Relevant central Government performance indicators, including those from the Audit Commission, will now reflect this. An initial assessment indicates RBK is reading level 2 (of 5 levels) on this standard. RBK will be working to improve this position, and will also ensure that the Race Equality Scheme will complement its work in this area.
Race Equality Scheme: the Legal Framework

The Race Relations (Amendment) Act places a positive duty on public authorities to promote race equality and eliminate unlawful discrimination. It makes it unlawful for public authorities to discriminate on the grounds of race in carrying out any of their functions. Hence the legislation places general duties on all public authorities, with a number of specific duties also placed on many of them, including all local authorities such as Kingston.

The specific duties include the publication of a race equality scheme. Such a scheme outlines how organisations plan to tackle race discrimination, and promote equality of opportunity and good race relations. Race equality schemes also need to be comprehensive, include relevant action plans and have identifiable targets. Specifically race equality scheme should include the following:

A summary of functions which are relevant to the duty to promote race equality and arrangements include:

- Assessing and consulting on the likely impact of policies on the promotion of race equality.
- Monitoring policies for any adverse impact on the promotion of race equality.
- Publishing the results of such assessments, consultation and monitoring.
- Ensuring public access to the information and services provided.
- Training staff in connection with the duties imposed by the Act and the specific and general duties.

In addition there are specific duties relating to employment including:

Monitoring the ethnicity of:
- Staff in post.
- Applicants for jobs.
- Promotion.
- Training.

And for organisations that employ more than 150 staff:

- grievances.
- disciplinary action.
- performance appraisal (when these result in benefits and sanctions).
- training; and
- dismissals and other reasons for leaving.
While Kingston is committed to the development and progression of the race equality scheme, we are also committed to ensuring that it complements our other work on equality. The general approach taken on the scheme is also reflected in our other equality work and approaches. This is especially important in the context of current work on disability and gender, and also in respect of legislation to be introduced over the next few years on age, religion and sexual orientation. We also consider that our initiatives on work life balance and staffing issues form an important part of our corporate approach and strategy on equal opportunities.
Function and Policies

Our Council is organised into 5 areas comprising the Chief Executives office and 4 Directorates, with all parts having functions, and policy responsibilities that are relevant to the Race Equality Scheme and the Council’s performance of its duties under the RRAA. Relevant Departments and their broad function areas include:

**Chief Executive’s Office:** Personnel; Democratic Services and Partnership; Legal Services; Strategic Services.

**Community Services:** Community Care Services (Resource Centre for Older People; Home Care; Placemants; Mental Health Team); Housing; Children and Family Services; Strategic Support; Environmental Health; Trading Standards.

**Education and Leisure Services:** Leisure and Lifelong Learning; Schools Group; Planning & Access, Social Inclusion Service

**Environmental Services:** Planning and Development; Business Support; Environmental Care; Highways and Transportation.

**Finance:** Financial Services; Treasury Services; Internal Audit; Valuation and Cashiers; Income; Council Tax & Housing Benefits.

Each of the directorates has developed equal policy strategies and approaches reflecting the corporate approach taken on equality. These form the basis of individual directorates work to deliver the Race Equality Scheme. It is important to stress that while the overall approach taken on the Race Equality Scheme is corporate, for it to be effective in practice in each part of the organisation, we are aware that we need to define what needs to be done to meet the requirements and spirit of the legislation throughout each part of the Council. Some departments, because of their functions, (Education, Social Services, Housing), will inevitably develop more extensive programmes of work than others. However it is emphasised that all of the Directorates are developing and implementing programmes of work in relation to their functions in the context of the Race Equality Scheme.

**Best Value as a method of assessing race and other equality areas.**

Best Value is about making continuing improvements to the services used by the people of Kingston. Best Value requires all Councils to provide services which are effective, efficient and economic. A central part of Best Value is carrying out reviews of various functions and activities of the Council, often looking at themes that impact across the organisation. Such reviews are now a key part of the way that we are working to improve the service we provide to the community. We believe that the Best Value programme is an important way of mainstreaming equal opportunity into the normal business of the Council.
We already take some account of equality matters in Best Value reviews. In future we will ensure that these issues are fully considered as a potential part of reviews, especially at the scoping stage. Overall we will ensure that the Best Value review process is utilised, where appropriate, to ensure that we fulfil our obligations and requirements under the RRAA as an integral part of the Race Equality Scheme.

**Policy Review**

In developing policies and new policy initiatives, the majority will have direct impact on the public, and the Council consults on this as a matter of course with relevant groups and communities. The Council also considers the potential impact of developing policies on equality considerations, including race. The potential impact of new policy development and initiatives on ethnic minority communities is an important part of the requirements of the RRAA and hence the Race Equality Scheme. At RBK we plan to include specific reference in Council reports to race and equality considerations. We plan to do this in a practical and consistent way so that Councillors, the public and communities can raise points and issues as necessary.

**Consultation**

Consultation and the involvement of the public in its work is a major priority for Kingston Council. We use a range of consultation strategies for this purpose. We believe that public involvement is essential to the democratic accountability and responsiveness of our Council. We take seriously our duty to consult, and importantly to listen to the results of consultation. We aim to have sound evidence of public views to help take informed decisions.

Consulting with and involving local people in decisions, which affect their lives and their communities, goes to the heart of our policy making. By introducing Neighbourhood decision making, many decisions affecting local communities are taken at a local level and take account of local people’s views of the Council and the services it provides. Best Value and the Citizens Panel have also involved extensive consultation with local people. Specific local groups are represented on the Council’s Equal Opportunity Forum. For example, Kingston Racial Equality Council, Kingston Voluntary Action and Kingston Centre for Independent Living, who are consulted about particular services. In addition, individual service areas (for example, housing, social services and education), have a range of consultation forums in place to consult effectively.

In respect of this Race Equality Scheme we have consulted on this Scheme initially through our Equal Opportunities Forum, and also our established links with ethnic minority communities.
However more generally we want to encourage ethnic minorities, as well as all equality related groups and individuals, to play an active part, as this scheme, and our work on other equality areas, develop over the next 1 to 3 years. We are aware that consultation is an area that needs to be worked at. Each of our directorates have developed strategies and plans to ensure the widest possible involvement and participation of communities and individuals in areas where the Council, directly and indirectly, may impact on their lives.

An important part of our approach is to work to obtain the views of groups who can be hard to reach. These include such groups as:

- Ethnic Minority groups and specific communities within them
- People with a physical or sensory impairment
- People for whom English is not their first language
- Older people
- Younger age groups
- Residents in institutions, hostels, temporary accommodation and other buildings which are difficult to access.
- People with ‘learning difficulties’
- The gay and lesbian community
- People suffering poverty/multiple deprivation
- People living with AIDS/HIV

While we believe that our current system of consultation is robust, we will continue to prioritise this as an area where we want to progress further. One of the challenges for us, along with communication with hard to reach groups, is to obtain the views of those who do not normally approach or contact the Council unless there is a problem or concern. Examples of future developments, and as reflected in directorate action plans include:

- Continuing to ensure that we provide concise, clearly written, jargon free and well presented materials that are easy to respond to.
- Targeting specific groups to be involved in particular projects, and development of working parties to look at specific areas and issues.
- Using existing news letters for local groups to discuss information and new approaches.
- Maintaining a central database of relevant ethnic minority groups.
- Ensuring interdepartmental sharing of knowledge and experience derived from those having most contact with relevant and agencies.
- Offering translations and interpreting services based on take up of services.
- Encouraging groups to disseminate information within their communities.

A range of other initiatives are being progressed for other equality areas, and form part of individual directorate action plans.
Finally, in the development of our consultation on this scheme and other equality areas more generally, we intend to work with other public authorities in the Kingston areas. The aim is to ensure that relevant communities and individuals can make their views known to a range of agencies in an effective and efficient way as possible.

**Monitoring and Assessment**

Monitoring the impact of our work on equality generally, and on race specifically, in relation to this scheme is an important part of our approach to equality. It is also a requirement of the RRAA. Our aim is to ensure that we are providing our services in a fair and equitable way. We will also take action as appropriate if we find that the needs of particular groups, for example, are not being met.

The Council has, and continues to develop a range of monitoring arrangements for each part of the organisation. These range for example from monitoring housing applications, to the provision of our social care responsibilities, to racial incidents and harassment, to education. In the latter area, in the last year, the Council has developed detailed systems for monitoring important areas such as pupil achievement. In education we have also developed a targeting frame work in order to assist the analysis of data and to consolidate our equality approach.

In other areas, we take a slightly different approach on monitoring and have not, for example, developed complex systems on a continuing basis. These include for example such areas as leisure services, benefits advice and administration. Here, because the nature of the relation between customer and the Council are usually one off enquiries or transactions, monitoring systems are being developed appropriate to these areas.

Hence we are developing the concept of ‘snap shot’ surveys. Such surveys are concerned with collecting specific data for a defined period of time, (for example, one month), for particular issues. The advantage of such an approach for these areas is that customers, members of the general public and staff will understand that these are one off exercises for an identified purpose. In addition we will be developing the concept of carrying out similar surveys in particular areas in relation to Best Value reviews, and also any customer surveys we may undertake.

Details of priorities for improving monitoring arrangements for each directorate are available from each of the directorate action plans that will be available as part of this scheme.

In developing and progressing our monitoring on service areas however, it is emphasised that we are working with a set of principles and approaches. These include:

- We will not collect data for the sake of it, and where the collection of data may become an end in its self rather than a means to an end. Data is collected for specific purposes and as a way of supporting management and Council decision making about how services are run and are effectively accountable.
There are some areas where continuing monitoring data is collected because of the nature of the services provided. These include housing, community care and education. In these areas, where data is collected, we aim to achieve as near to 100% response rates as possible. Where we consistently fail to collect data in some areas, we will review and reconsider these, and as appropriate look at alternative ways of collecting data.

In other areas, where customers and clients only interface with the Council on an occasional basis, we will use other ways of obtaining monitoring data, including the use of snapshot surveys.

All data collected is confidential and will be summarised in user-friendly reports which will explain the data collected, determine any patterns, and make recommendations for any further action. All such reports will be available to staff and the public.

We will ensure that lessons learnt and good practice identified in all parts of the Council are shared and also coordinated across the organisation. A corporate monitoring framework will be developed in order that all equality monitoring in place in the Council is assessed and evaluated on a regular basis. In respect of race, this will lead to one corporate annual report being produced on monitoring, which will form part of our continuing assessment of the effectiveness of this R.E.S. We will also summarise such monitoring information in short user-friendly formats for wider distribution and comment.

Overall, while recognising the importance of monitoring as part of our equality policy and approach, we will also ensure that such monitoring systems are practical, realistic, effective and accountable.

**Access and Information Provision**

RBK provides a range of information and formats for communicating with residents and the public. These are produced centrally and also in each of the directorates. In all parts of the organisation we are committed to dealing with all those who contact the Council, be it by letter, telephone or in person, in a friendly, positive and sympathetic way.

The Council is also currently developing a programme of setting up local service centres which will be located in places that are convenient and accessible for Kingston residents to use.

With the diverse communities that reside in Kingston, it is necessary to consider communicating with people whose first language is not English, and also to take account of disability considerations. Where necessary the Council ensures that communication between the Council and members of the public are supported by translations into another language, Braille or spoken word cassette, mini com, or integrated bi-lingual interpreter or sign language.
For example, a range of leaflets and documents have been offered in a variety of languages that reflect the local population. However our experience has shown that simply translating material is not necessarily what is required, or sufficient to meet the needs of various groups. Hence, our emphasis is now on ensuring that interpreting services are offered to assist in understanding the issues in question, with translations offered only if specifically required.

Overall the Council continues to make publications available in translations and in Braille on a responsive basis to residents. The Council will keep this area under review in each of its departments. We emphasise the need for the experience gained in various parts of the Council to be shared throughout the organisation. For example, steps have recently been taken to place relevant translations on the intranet site. We intend in the future to place a stronger emphasis on the sharing of good practice and also effective coordination on work in this area.

Finally, in relation to this Race Equality Scheme, as part of the Council's approach to equal opportunities, we will make the scheme widely available to members of the public via libraries, Council offices and from our website etc. A summary of the Scheme in a user-friendly format for wider distribution will be available.

Members of the Council and staff will receive notification of the scheme, and the scheme will also be brought to the attention of all applicants for employment in the Council, along with our equal opportunity policy.

**Training**

An extensive programme of training has been developed and progressed in the Council’s directorates on equal opportunity, and some specific training has already been developed on the RRAA.

We aim for all our training to take account of equal opportunity issues. Employees who are responsible for recruitment and selection receive appropriate training. Arrangements are made to ensure that all new employees, as part of induction, are informed of Kingston’s equal opportunity policies and practices. This scheme will now be included as part of the induction briefing.

As part of the Council’s Stephen Lawrence action plan, a programme of briefings for Members and employees has been undertaken, in partnership with Kingston Racial Equality Council, to raise awareness of the issues highlighted in the report. We will also be developing further courses about the RRAA. Such training may include:

- General training/briefing for all staff to ensure that they are aware of the duties and how they affect all staff and work undertaken.
- Specific skills training for those who will be developing and implementing aspects of the scheme or whom are decision makers in respect of policy and other relevant areas.

Training will continue to be part of our review system on progress made on this scheme.
Employment Duties

Our approach

RBK has carried out a significant programme of work on employment, staffing and equality issues over recent years and now has an effective and comprehensive corporate policy and approach in this area. In summary we have:

- Developed an ethos and approach that places an emphasis on valuing our employees and encouraging employee involvement and development so that employees can reach their full potential.
- As a central part of our equal opportunity policy we ensure that there are no barriers in recruitment practices to the employment of any group. We are committed to broadening our sources of employment to include groups such as older workers, ethnic minority groups, people with disabilities and women returning to work. In this area for example, we are developing a number of initiatives to target ethnic minority communities to make applications for jobs to the Council.
- We place a strong emphasis as an employer on work life balance approaches. Flexible working arrangements are provided to ensure employees take account of their personal circumstances and benefit from a good work life balance. Schemes include job sharing and flexible working hours. For example there are a number of initiatives to assist employees with child and elder care responsibilities. There are a range of other work life balance initiatives in place. In addition full use is made of help available to assist in the employment of people with disabilities.
- We are committed to creating a work place free from harassment and bullying. We have introduced procedures to deal with sexual and racial harassment and bullying to ensure that if incidents occur they are dealt with promptly and thoroughly.

Monitoring and assessment: What we do

We have developed an effective system for obtaining monitoring data on all applicants applying for jobs at RBK and have virtually a full monitoring profile of staff working in the Council. In respect of schools we are currently working with them to increase the data available. In addition we have recently completed an exercise to ensure that our classification system reflects the census categories. We produce regular reports on our monitoring data, including analysis data on ethnicity, gender and disability. Our results show that in terms of ethnicity there has been a gradual increase in their representation in our work force:

- In 1990 the percentage of the workforce from an ethnic minority background (excluding teaching staff and manual workers) was 3.5%
- In 1998 the percentage of the workforce from an ethnic minority background (excluding teaching staff and manual workers) was 5.3%
- By 2001 the percentage of the working force from an ethnic minority background is as follows:
  - 11.94% excluding staff employed in schools but including former manual workers
  - 5.44% for staff employed in schools (4.95% in 2000)
  - 8.99% for all Kingston staff

- Although there has been a significant increase in the proportion of ethnic minorities in the workforce, there has also been an increase in their representation in the local community:

  The 1991 Census put the local ethnic minority community at 8.6%
  More recently the London Research Centre has suggested that it could be as high as 12.8%
From information in 1990 (excluding teachers and manual workers) the proportion of the workforce from an ethnic minority background was at less than half the level of representation in the local community. However, by 2000 this level had risen to about three quarters and in 2001 it continues to increase. (In part this can be attributed to improved workforce information).

We will continue to collect relevant monitoring data as part of this scheme and make it available in user-friendly form. Where action is required in respect of the analysis of information collected, we will make this clear and as appropriate consult on any initiatives that we may develop in this area.

The RRAA requires that we should monitor detailed information in respect of training, disciplinary and grievance cases, appraisals and individuals leaving the employment of the Council. With our current data information systems we can monitor such areas as required and will do so on an occasional basis. In respect of training and 'exit interviews,' while not developing a continuing monitoring system, which we believe to be unnecessary, we will be conducting occasional short term targeted surveys. Such snap shot surveys will be conducted over agreed periods of time in order to assess any equality implications that may arise in these areas. Such surveys will be scheduled for various times over the next 1 to 3 years as part of our action plan on this scheme and our policy on equal opportunities more generally.
Dealing with complaints

RBK has a detailed system for making complaints across the Council. This was developed following a detailed review in 1997 and a new complaints procedure was put in place. As part of this review we were concerned with ensuring that our complaints system addressed issues of personal and social barriers to making a complaint. This should take account of and recognise the following type of issues:

- Many, probably most users, do not complain when they experience unsatisfactory service.
- While it is essential that a complaints procedure is easily accessible, it cannot be assumed that every user who is dissatisfied will be reached.
- Conversely low usage of a complaints procedure does not necessarily imply that some people do not have serious problems with a service.
- Individual users usually need to use the procedure only rarely.
- They will have limited understanding of how it works and limited resources of time, energy and time. They may be reluctant to use the telephone, find it difficult to read, write or express a problem verbally, or feel dubious about persevering if their first attempt proves fruitless.

Our new procedure therefore considers complaints in the wider context of communicating with local residents to whom we provide services. In our view, effective redress for an inadequate or faulty service is essential in the public sector where competition and therefore consumer choice is often limited.

Our detailed complaints procedure is available at libraries and Council offices, and a short summary ‘Have your say’ is widely available.

In respect of equality issues and race specifically, while monitoring data is collected where possible on complaints, we are aware that this is being done inconsistently. We are also aware that this area can present practical difficulties. Often individuals who wish to complain do not necessarily want to provide such personal information. In the future therefore we intend to take action in four areas:

- Review the collection of ethnic data and other equality data on complaints, and assess the proportion of relevant data collected and its relevance.
- Develop the concept of utilising short surveys to be used for specific periods of time and pilot these in terms of complaints in some departments.
- Develop a system of coordinating a system across the Council in order to assess potential corporate issues and any identified patterns across the organisation.
- Produce an annual report on complaints to include an analysis of any equality issues. This will form part of our continuing assessment of the Race Equality Scheme and our equal opportunities policy.

Procurement, Funding and working with Partners
While the RRAA applies to public authorities, it places ‘indirect requirements’ on external contractors, and also organisations that a public authority may fund or work in partnership with. The reason for this is that public authorities have a number of requirements placed on them in relation to race equality. When work is outsourced, by a public authority, it is reasonable that any contractors or suppliers should also meet the requirements placed on the public body. It is the responsibility of the public authority to ensure that this happens in practice. If they do not, they are vulnerable to complaints or potentially may be in contravention of the RRAA.

In RBK we already take account of equal opportunity in our procurement arrangements, and in our work with partners, primarily in the voluntary sector. In summary:

- In the procurement arrangements, potential suppliers are required to provide detailed information on their approach to equality and provide evidence that they have relevant systems in place.
- Similarly, in our work with the voluntary sector they are expected to have equal opportunity approaches and systems in place. Where they have not, they can utilise the Council’s model system and we provide guidance on this.

Hence our current system complies with the RRAA. However we intend to introduce some changes in respect of larger contractors and suppliers in order to obtain information on how their opportunity policy operates in effect over periods of time. This will involve our receiving agreed monitoring reports. To progress this approach with contractors we will:

- Notify current and future contractors and suppliers of our obligations under the RRAA and the potential impact this may have on public authority contractors.
- Agree, with relevant current contractors (and future suppliers), the appropriate information we will need to have on a continuing basis.
- Where appropriate, provide guidance to contractors and suppliers on how they might approach this area. This will be based on our own scheme, and our equal opportunity policy and experience on equality generally.

Information on our work with contractors and partners, and the voluntary sector will form part of our continuing review and assessment system set up to monitor to progress the Race Equality Scheme and our equal opportunity policy.