Race Equality Scheme 2002-2005 for
London Borough of Waltham Forest

This document is subject to ongoing consultation and will be further refined. The Race Equality Scheme is adopted as a living document and therefore it may be updated on an ongoing basis in response to ongoing internal and external consultations.

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1. PREFACE

OUR RACE EQUALITY VALUES

The London Borough of Waltham Forest is committed to equality of opportunity in the provision of services. We aim to create the best possible quality of life for the people of Waltham Forest by delivering the highest quality service to all the diverse communities without discrimination. We aim to pursue equality policy objectives that promote equality, celebrate diversity and eliminate institutional discrimination.

We want to make sure that our race equality outcomes for service delivery and employment policies and practices are fair and equitable. We want our service delivery, employment, promotion and retention practices to be accessible to every one regardless of race, ethnic or national origin, disability, gender, sexuality, age, class, religion/faith group or any other factors that may cause disadvantage. We will not tolerate any unfair or discriminatory service delivery or employment practices that result in unfair outcomes for any group or individual.

We want to make sure that we deliver what we promise. For that reason, we will be ambitious as well as deliver real improvements on the ground.

Leadership of the London Borough of Waltham Forest

Chief Executive
2. INTRODUCTION

This Race Equality Scheme is a statement of how London Borough of Waltham Forest plans to meet both its general and specific duties to promote racial equality under the Race Relations Act 1976, as amended.

This Race Equality Scheme is part of all the authority’s strategies, policies and procedures. The Scheme will be fully reviewed within a period of three years from 31st May 2002 and within each further period of three years. The Council’s Race Equality and Stephen Lawrence Implementation Group will keep the Scheme under intermediate annual review.

Council Officers in each Directorate responsible for implementing the Race Equality Scheme can access the comprehensive Codes of Practice and Guidance, and good practice examples, on the CRE website at www.cre.gov.uk. This Scheme is based on the ‘Guide for Public Authorities’, issued by the CRE as a way of helping public authorities follow the ‘Statutory Code of Practice on the Duty to Promote Race Equality’.

CONTEXT

The Race Relations (Amendment) Act 2000 – the Act - is the government’s response to the need to eliminate institutional discrimination as identified in the recommendations of the Stephen Lawrence Inquiry Report. Many communities have lost faith in the ability of public authorities to deliver race equality and fair outcomes for all diverse communities. The Act puts a responsibility on public authorities, including the London Borough of Waltham Forest, to rebuild trust with communities and demonstrate fairness. The Act also gives public authorities an opportunity to factor fair outcomes into the modernisation agenda.

WHAT ARE THE GENERAL DUTIES?

The Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2000, gives public authorities a general duty to promote race equality to over 40,000 public authorities, including LBWF.

In the context of the Act and the Code of Practice the term ‘functions’ means the full range of the authority’s duties and powers. Under the duty when the local authority carries out its functions, we must aim to:

- Eliminate unlawful racial discrimination
- Promote equality of opportunity
- Promote good relations between people of different racial groups

The aim of the general duty is to make race equality a central part of the way the local authority works, by putting it at the centre of policy making, service delivery, regulation and enforcement, and employment practice.
GUIDING PRINCIPLES OF THE GENERAL DUTY

The Statutory Code of Practice on the Duty to Promote Race Equality sets out four guiding principles that should govern public authorities’ efforts to meet the general duty to promote race equality. The London Borough of Waltham Forest will apply the four principles set out in the Code of Practice as follows:

- Promoting race equality is obligatory, and the local authority will do everything it can to meet the general duty.
- The local authority will meet the duty to promote race equality in all of its relevant functions.
- The weight given to race equality by the local authority shall be proportionate to its relevance.
- The elements of the duty are complementary (which means they are all necessary to meet the whole duty).

WHAT ARE THE SPECIFIC DUTIES?

Under the specific duties covering policy and service delivery, London Borough of Waltham Forest must

- Publish a Race Equality Scheme, which
  - States the functions and policies assessed as being relevant to the general duty to promote race equality, and
  - Sets out arrangements for meeting the duty by:
    - Monitoring all policies for any adverse impact on race equality
    - Assessing and consulting on the likely impact of proposed policies
    - Publishing the results of the assessments, consultation and monitoring
    - Making sure that the public have access to information and services
    - Training staff on the general duty

Under the specific duties on employment, the London Borough of Waltham Forest, must monitor the following by racial groups and annually publish the results:

- existing staff,
- applicants for jobs,
- internal applicants for promotion
- who receives training
- the outcomes of performance assessments when they lead to benefits/detriment
- who is involved in grievances/disciplinaries
- those who cease employment with the Council, including dismissals.

* The systems for these are being developed during Years 1 and 2 of this Scheme.
3. OUR RACE EQUALITY VALUES, PRINCIPLES AND STANDARDS

The race equality values, principles and standards of the London Borough of Waltham Forest are set out in three key corporate documents:

1. The Council’s Equality in Service Delivery Policy
2. The Manual of Personnel Policies and Procedures, due to be replaced by the new Framework for Managing People
3. Waltham Forest: Performance, Culture and Change

4. OUR RACE EQUALITY STRATEGIC AIMS

The Council aims to achieve the highest standards of race equality performance and outcomes in all its employment, service delivery and partnership arrangements.

The Race Equality Scheme is a strategy and action plan that uses existing systems and procedures and ensures race equality targets and performance indicators will be an explicit part of every Council Business Plan. The race equality targets, to be mainstreamed in each Directorate and monitored by Equality Boards, will be aimed at eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between people of different racial groups.

Race equality targets will be linked to the Council’s 11 Key Priorities that underpin our Community Strategy, Local Public Services Agreement, and our “Committed to Success” Programme for the next 3 years:

- Improve the Council’s performance across the board.
- Strengthen the Council’s financial management.
- Improve people management across the Council.
- Make the new constitution work effectively.
- Improve the Council’s approach to “customer care”.
- The regeneration of Walthamstow Town Centre.
- Improve the educational attainment of black & minority ethnic children, to improve overall educational attainment rates.
- Targeted intervention on the “Street Scene”, based on factual evidence about the worst areas and citizens’ priorities.
- Improve public health and citizens’ confidence in the local health service.
- Respond positively to citizens’ priorities in crime reduction and reducing fear of crime.
- More active leadership to achieve major investment in transport infrastructure needed to regenerate the borough.

THE EQUALITY STANDARD FOR LOCAL GOVERNMENT

The Race Equality Scheme sets out the methodology for meeting each specific duty to ensure the delivery of race equality outcomes against each strategic objective. The Equality Standard for Local Government is the framework for mainstreaming race equality practice in all Directorates. The Equality Standard will help us achieve our
race equality strategic aims and objectives to the benefit of all the diverse communities of Waltham Forest.

**ACTION PLAN AND TIMETABLE**

**5. HOW WE WILL MEET THE GENERAL DUTY**

The London Borough of Waltham Forest is committed to mainstreaming responsibility for delivering race equality to all managers and staff.

All of the functions of the local authority are relevant to the general duties. In paying due regard to the duty to promote race equality, the London Borough of Waltham Forest will give appropriate weight (priority) to the promotion of race equality when carrying out its functions. The weight given to race equality will be in proportion to the relevance of the function.

To meet the general duty, we will pay due regard to each specific duty.

**Structure for Managing Race Equality Performance**

Equality Boards are the transparent and accountable structures in each Directorate. The Boards establish, monitor and review the equality action plans of their Directorates. Each Board reports to the Race Equality and Stephen Lawrence Implementation Group (RESLIG), which is a sub-group of Management Board and meets every two months. An external race equality review group composed of the various ethnic minority communities in Waltham Forest monitors the work of RESLIG.

Equality Boards will use the Equality Standard for Local Government as the strategy and toolkit for systematically mainstreaming race equality into the performance management of all service areas, employment and partnership functions of the Council.

- Appendix A sets out the 3-year timetable for mainstreaming race equality into the specified list of Strategic Plans which embrace all key policies of the Council.
- Appendix B sets out the Equality Impact Assessment Checklist which will enable effective monitoring of strategic plans.
- Appendix C sets out the Best Value Performance Indicators (and some local ones) which shall be monitored by racial groups – the systems will be established over years 1 and 2 for these.

Equality Boards, working with Service Heads and stakeholder representatives, will establish outcome-driven race equality targets for Directorate Action Plans following the programmed reviews of all plans as specified in this Scheme (App.A). In addition, all Best Value Reviews will implement Equality Impact Assessments to enable the Council to mainstream racial equality within all service improvement plans.
Who is responsible for managing race equality performance?

- Equality Boards will establish outcome-driven race equality targets as determined by reviews of Strategic Plans and analysis of monitoring information relating to the specified BVPIs in Appendix C.

Timetable

- By 30th September 2002, we will have identified all relevant plans and a timetable for race equality reviews will be finalised.

6. HOW WE WILL LINK THE GENERAL AND SPECIFIC DUTIES

The specific duties are a means to an end. Our ultimate objective is to meet the general duty. In practice, this means that each time we tackle a specific duty, we must ask ourselves if we are meeting the general duty, or what we should consider doing to help us meet it. When tackling a specific duty, we will always link back to the general duty by asking the following question:

What action do we need to take, if any, to eliminate unlawful discrimination, promote equality of opportunity and promote good race relations?

Who is responsible for recommending action to meet the General Duty?

- When we need to take action to meet the general duty, Heads of Service will set out an action plan with a timetable and costs to make the necessary changes.

Timetable

- Heads of Service will report within 6 month’s of completion of Race Impact Assessments of the particular service or employment area.

7. HOW WE WILL MEET THE SPECIFIC DUTIES

SPECIFIC DUTY 1
Prepare and publish a Race Equality Scheme

The Council has a specific duty to prepare and publish a Race Equality Scheme by 31 May 2002. The Scheme, which is this public document, sets out how the Council plans to meet its general and specific duties to promote race equality. The Scheme is effectively a strategy and an action plan. It summarises our approach to race equality and meeting our corporate objectives.

The aim of the Scheme and other specific duties is to help the Council to tackle racial discrimination and to promote equality of opportunity and good race relations.
To meet the general duty, the Scheme must be put into practice. The Race Equality Scheme explains how the Council plans to meet its general duty to promote race equality. The Council is answerable to the public for delivering the programme set out in the Scheme. It says how we plan to meet each part of the duties, that is, our arrangements for assessing, consulting, monitoring and training.

The order that sets out the specific duties states:

2 (2) A Race Equality Scheme shall state, in particular –

(a) those of its functions and policies, or proposed policies, which that person assesses as relevant to its performance of the duty imposed by section 71(1) of the Race Relations Act; and

(Plans and Policies as set out in Appendix A)

(b) that person’s arrangements for –

(i) assessing and consulting on the likely impact of its proposed policies on the promotion of race equality;

(As part of the Council’s Consultation Strategy)

(ii) monitoring its policies for any adverse impact on the promotion of race equality

(Human Resources Related items and BVPIs set out in Appendix C)

(iii) publishing the results of such assessments

(Annually as part of the BVPP)

(iv) ensuring public access to information and services which it provides; and

(Via website and information in other formats)

(v) training staff in connection with the duties imposed by section 71(1) of the Race Relations Act and this Order.

(Through adaptation of existing Equal opportunities Training Provision)

(3) Such a person shall, within a period of three years from 31st May 2002, and within each further period of three years, review the assessment referred to in paragraph (2)(a).

Who is responsible for preparing the Race Equality Scheme?

- Council Officers nominated by RESLIG will prepare the Scheme.

Timetable

- To be submitted to the first Cabinet to meet following the Local Elections
SPECIFIC DUTY 2
Assess all functions and policies for their impact on race equality

The Council will consider the impact of current and new policies in each service area/plan and apply the following criteria:

I. Is there any evidence of higher or lower uptake of services or participation by different groups?

II. Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy?

III. Is there an opportunity to promote equality of opportunity or good relations by altering the policy?

IV. Have consultations with relevant groups, organisations or individuals indicated that particular policies, functions or duties create problems that are specific to them?

Service Plans and Policies will be reviewed so that policy changes may be considered by Equality Boards. Service plans will be adapted in response to any problems highlighted in the reviews.

A review is underway on ethnic monitoring systems to ensure regular progress checks can be carried out on the effects of the various policies the Council uses for each function, and on any changes made to the policies.

Who is responsible for assessing all functions and policies for their impact on race equality?

- Equality Boards and Service Heads in each Directorate.

Timetable

- The Council will assess all of its functions and policies for their relevance on race equality by 31st May 2002. Race equality reviews will be undertaken within the timescale set out in Appendix A

SPECIFIC DUTY 3
Arrangements for monitoring the impact of policies

This section of the Race Equality Scheme sets out the Council’s arrangements for monitoring any adverse impact of our policies on the promotion of race equality.

Equality Boards and Service Heads in each Directorate will check and confirm that efficient ethnic monitoring and evaluation systems are established across all of our
functions. Where sufficient monitoring systems are identified, Service Heads will propose an action plan to ensure the monitoring is robust in accordance with agreed Year 1, 2 and 3 priorities. Core monitoring systems will be established in years 1 and 2 for the BVPIs listed in Appendix C. Equality Boards will identify local PIs that may be of value for monitoring performance on race equality outcomes.

Results of Satisfaction Surveys will be reviewed to inform this process. Evaluations of impact assessments will be published annually through RESLIG.

Who is responsible for arrangements for monitoring the impact of policies?

- Equality Boards and Service Heads in each Directorate will check and confirm that efficient ethnic monitoring and evaluation systems are established across all of the functions.

Timetable

- Year 1, 2 and 3 priorities will be determined by the outcome of the assessment of functions and policies.

SPECIFIC DUTY 4
Arrangements for assessing and consulting on proposed policies

We will assess the likely impact of our proposed plans, policies and strategies on the diverse communities of LB Waltham Forest before they are adopted. We will make sure that the policies we propose to introduce promote equality of opportunity and good race relations, and do not lead to direct or indirect discrimination.

We will consult with people likely to be affected by the policy about what our proposals will mean for race equality. We will ask ‘Could this policy affect some racial groups differently, and will it promote good race relations?’

The assessment of relevance of policy/plan/strategy against the General Duty will include all or most of the following:

- Demographic data and other statistics, including census findings.
- Available research findings.
- Survey data.
- Ethnic monitoring data.
- One-off data-gathering exercise.
- Specially commissioned research.
- Assessments will take account of as much data as possible. Each service head will write a formal impact assessment report, which outlines whether and how the policy should be revised in the light of the assessment.
- Comparisons between similar policies in our own or other public authorities.

Consultation process

Consultation will be built into each stage of our policy development and planning process. We will aim to make sure that:
• People from all ethnic backgrounds are consulted and that their views are taken into account when preparing plans and developing various policy options.
• The consultation methods are tailored to the groups we want to reach.
• We do not use consultation too often, or keep using the same groups.
• The consultation exercise is well managed, properly time-tabled, has clear aims and is clearly explained to the people involved.
• We will monitor and assess the consultation methods themselves and, if necessary, adapt them; and
• We will publish the results of these consultations and feed them back into the planning and decision-making processes in an open and responsible way.

**Whom should we consult?**

We will include all relevant stakeholders – inside and outside the local authority – in our consultations. Stakeholders will have an opportunity to express their opinions, concerns and suggestions.

We aim to be fully inclusive of all diversity in our consultations. We will try to involve anyone in our Borough who is interested in promoting race equality, from individuals to community groups, associations, corporate teams and strategic partnerships.

We will work closely with internal stakeholders too. We recognise the importance of consulting widely with staff, trades unions and staff associations at all stages of developing our race equality strategy.

We are committed to promoting good race relations within and between all the diverse individuals and communities of Waltham Forest and beyond. We recognise that we must consult as widely as possible when developing the Race Equality Scheme so that we have the widest possible support for the Scheme.

We acknowledge that, because discrimination, racial harassment and violence largely affects people from ethnic minority groups, and because people from these groups sometimes do not have confidence in the way services are provided to them, it is particularly important to include them in consultation.

• We will take special care to include individuals and communities who may not normally be part of routine consultations, or who may be harder to reach and hear.

**What consultation methods should we use?**

We have considerable experience of community consultation and use a variety of methods such as surveys, focus groups and public meetings. We keep our methods under constant review to make sure we seek and hear the views of all our diverse communities.

We will continue to encourage people from all ethnic backgrounds to play a full part in our consultations, and to feel confident enough to talk about their needs and their experiences of the Council’s policies and services.
We will aim to use some or all of the following methods to ensure we reach all our diverse communities, including those who are often excluded:

- Hold meetings in local neighbourhoods, since this is the level at which most people have concerns
- Keep the meetings informal, as people can feel uncomfortable and shy in formal situations
- Hold separate meetings for particular ethnic minority communities, and also for particular groups within those communities, such as young people, women, lesbians and gay men, disabled people, Gypsies and Travellers.
- Ask local ethnic minority community associations, racial equality councils, other minority agencies and community associations to help us organise these meetings, jointly if possible
- Use community venues wherever possible, and check that dates, times and venues do not clash with religious customs or festivals
- Use focus groups, reference groups and citizens’ juries, so that we can explore particular issues in detail with selected individuals
- Use written questionnaires or interview surveys to reach a wider audience, or a particular cross-section of the local population
- Translate all relevant consultation material into the main community languages, and arrange for interpreters at meetings
- Set up lay advisory groups for regular discussion and consultation, and select members in accordance with agreed written criteria for their particular skills or experience.

Who is responsible for arrangements for assessing and consulting on proposed policies?

- Heads of Service are responsible for ensuring proper arrangements are made that comply with the general duty and meet the specific duty to assess and consult on proposed policies in their service areas. Through the consultation process, we will check which services need to be monitored by ethnicity.

Timetable

- With effect from June 2002.
**SPECIFIC DUTY 5**  
Arrangements for publishing assessment, consultation and monitoring results

**Why publish?**

This duty is about transparency and accountability. It aims to make sure that our monitoring, assessment and consultation activities, and their results, are clear and plain to the public.

If public authorities are to win and keep public confidence, they need not only to promote race equality but also to be seen to be doing so. By publishing the results of our activities, we will show that we are carrying out the specific duties of monitoring, assessing and consulting on the effects of our policies.

Publishing our results will show our commitment to promoting race equality. Our staff will be better informed about our policies and more aware of the standards of good practice. Also, public confidence in our local authority will increase, particularly among the ethnic minority communities we serve.

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<tr>
<th>Who is responsible for arrangements for publishing assessment and consultation results?</th>
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<tr>
<td>• Service Heads leading on plans.</td>
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<tr>
<td>• RESLIG and Equality Boards will consult with the Public Relations Unit and e-Government managers to ensure summary reports are published and distributed in appropriate formats.</td>
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<th>Timetable</th>
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<td>• Summary reports will be published annually. Full technical reports are available on request from Democratic Services.</td>
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**SPECIFIC DUTY 6**  
Access to information and services

We want to make sure that public services work for everyone. Lack of information can be a disadvantage and people from ethnic minorities can be particularly affected. This is especially the case for people who arrived in Britain recently, such as refugees and asylum seekers. If London Borough of Waltham Forest is to meet its general duty, then we must make sure that people have equal access to information about our services, whatever their racial group. This should also help to successfully integrate people from all ethnic backgrounds into Britain’s multi-ethnic society.

If people from ethnic minorities
• Do not know about particular services
• Are not confident about using them; or
• Meet barriers when they try to use them,

the Council is failing in its duty to make its services equally available to everyone.
What do we need to do?

To meet the duty, we will have to do the following:

- Monitor and review how people, including people from ethnic minorities gain information about our services.
- Identify and remove any barriers that people from some racial groups might face when they try to get information about our services.
- Change, if necessary, the way we make available our information about access to services so that no one is excluded.

How will we do it?

As part of our review of the Council’s Customer First Strategy, we will undertake an analysis of take up and undertake surveys to determine the improvements necessary.

How should we identify possible barriers?

There are various ways we can identify possible barriers, including:

- Monitoring the information that’s asked for, by racial group.
- Monitoring the services used by racial group.
- Getting feedback from people who use our services and information, including people from ethnic minorities.
- Analysing complaints about services or information, by racial groups.
- Consulting people in our area, including people from ethnic minorities.
- Possible barriers that people from ethnic minorities might face include
  - Not knowing about our services.
  - Our authority not providing the services that people from ethnic minorities in our area want.
  - Feeling alienated because of the way we provide our services.
  - Not having English as a first language.
  - Not feeling confident enough to use the services; and
  - Having had a bad experience of one of our services in the past.

Who is responsible for access to information and services?

- Equality Boards will ensure a systematic approach to managing race equality performance and outcomes is adopted in each Directorate, for instance by moving forward through the five levels of the Equality Standard for Local Government, which incorporates racial equality measures.

Timetable

- Year 1, 2 and 3 priorities will be determined by the outcome of the assessment of functions and policies.
SPECIFIC DUTY 7
Arrangements for training staff on the issues that are relevant to the general duty

Effective training on race issues is an important part of the Race Equality Scheme. We want to make sure that staff working in this area have the skills they need so the Council can meet the general duty to promote race equality.

We will concentrate, in the first instance, on the training needs of those staff who have special responsibilities for managing and introducing the Council’s Race Equality Scheme.

All our staff will, in due course, need training to make sure they understand the general and specific duties of the Act, and their part in delivering race equality outcomes.

What should the training cover?

We will make sure that staff delegated to work on our general and specific duties have a good general understanding of race issues. We also expect such staff to be able to develop complex strategies for the Council and apply them effectively. We will first make sure that the staff have these general skills before going on to the specific knowledge they will need.

The training will cover the following areas:

- A general understanding of race equality issues as they affect public authorities, including the idea of ‘institutional racism’
- How to introduce policy in large organisations
- The general and specific duties, and why they are important
- The concept of a Race Equality Scheme and how to develop it and put it into practice
- How to carry out assessments, consultation and monitoring, and how to publish reports on them, and publicise them widely

What will we need to do?

To train staff, we will need to

- Draw up a list of tasks that staff will need to carry out if we are to meet our general and specific duties under the Act
- Choose which staff will carry out the tasks
- Decide what knowledge and skills they will need to carry out these tasks effectively
- Design a training programme to meet these needs
- Choose trainers (inside or outside the authority) who are qualified to deliver this training
- Set up the training programme, and
- Monitor and assess the training, making changes where necessary.
Who will design the training programmes?

Council Officers already responsible for training will design the training programmes. As part of the design, they will identify which staff need training and the elements of training they need. They will report progress to Performance Boards and Equality Boards.

The Officers will consult and involve people from ethnic minorities in developing and delivering the training.

Who is responsible for arrangements for training staff on the issues that are relevant to the general duty?

- The Head of Human Resources is responsible for ensuring adequate arrangements are made to train staff to meet the general and specific duties, and for reporting outcomes to RESLIG.

Timetable

- Officers responsible for training staff to implement the Act will be trained as soon as the Code of Practice and guidance documents are finalised in 2002 and will cascade training to other Officers.

SPECIFIC DUTY 8
The Specific Duty on Employment

The specific duty on employment expects public authorities to use information from their monitoring to develop schemes that will lead to a public sector workforce that represents Britain’s multi-ethnic population.

The specific duty states:

5 (1) A person to which this article applies shall,

(a) before 31st May 2002, have in place arrangements for fulfilling, as soon as is reasonably practicable, its duties under paragraph (2); and
(b) fulfil those duties in accordance with such arrangements.

(2) It shall be the duty of such a person to monitor, by reference to the racial groups to which they belong,

(a) the numbers of –

(i) staff in post, and
(ii) applicants for employment, training and promotion, from each such group, and
(b) where that person has 150 or more full-time staff, the numbers of staff from each such group who

- (i) receive training;
- (ii) benefit or suffer detriment as a result of performance assessment procedures;
- (iii) are involved in grievance procedures;
- (iv) are the subject of disciplinary procedures, or
- (v) cease employment with that person.

(3) Such a person shall publish annually the results of its monitoring under paragraph (2).

What does the Duty mean?

Ethnic monitoring is the process we use to collect, store and analyse data about people’s racial groups. Under this duty, we must do the following:

- Collect information about the ethnic backgrounds of our workforce, and of all applicants for jobs, training and promotion in our authority.
- Monitor and analyse by racial groups:
  - Grievances
  - Disciplinary action
  - Performance appraisals (when they lead to benefits or penalties)
  - Training; and
  - Staff leaving the authority, including dismissals
- Publish these ethnic monitoring results every year.

To meet the general duty to promote race equality – that is, to tackle racial discrimination, promote equality of opportunity and promote good race relations – we will need to use the information:

- To see if there are differences between different racial groups
- Investigate the underlying reasons for the differences; and
- Deal with any unfairness, disadvantage or possible discrimination, for example by setting employment targets, training staff, revising policies and procedures and using positive action when necessary

Why is ethnic monitoring of staff important?

Discrimination takes place in employment when people from some racial groups are treated less favourably than others. Discrimination is not necessarily deliberate. In fact, barriers to employment or promotion for particular racial groups can often be hard to see. Evidence from successive Labour Force Surveys shows that ethnic minorities are under-represented in employment, especially at senior levels, compared with the population as a whole.
Ethnic monitoring will give a clear picture of what is happening in our workforce, so that we can see whether our equal opportunities policies are working, and to measure their progress. It gives us a basis on which to:

- Make sure we use people’s talents to the full
- Make sure that staff selection decisions are based on objective criteria that strictly match the job that has to be done
- Avoid unlawful discrimination in employment
- Make sure we achieve our employment targets; and
- Make the workforce more representative of the community we serve

**What do we need to do to meet the Specific Duty?**

The Council already produces annual ethnic monitoring reports of our employment. Personnel managers will review the content and quality of our ethnic monitoring and evaluation systems to make sure we comply with the requirements of the Specific Duty on Employment. The Head of Human Resources will produce an action plan to recommend any changes in current monitoring and evaluation systems, if necessary.

Designated Officers will be guided by the CRE guidance on the monitoring duties under the Act, ‘Ethnic Monitoring: A guide for public authorities’.

To meet the Specific Duty on employment, we will

- Collect and monitor information about employment
- Analyse the information to see if there are any differences between racial groups
- Take any necessary action to remove barriers and promote equality of opportunity; and
- Publish the monitoring results each year.

**How should we collect the information?**

We ask our staff and job applicants to describe their racial group from a number of possible categories. Job applicants answer this question on a form that we separate from the application so it is not seen by the people drawing up the shortlist.

We will carry out a survey of all our staff if our review of monitoring and evaluation shows our records are incomplete or unreliable. We will keep our records up to date as new recruits join, and existing staff move within the organisation or leave.

Good rates of reply depend on whether staff and applicants understand the purpose of ethnic monitoring, and share our commitment to promote race equality.

**What ethnic categories should we use?**

We will use the same categories as in the 2001 census, or categories that can be easily compared with the census categories. This lets us compare our authority with the wider population. It also means we can use other information, such as the Labour Force Survey, as the census categories are widely used.
How should we use the results?
Personnel Managers will analyse the information we collect to see if there are patterns of inequality that we need to investigate. They will report results to Equality Boards every quarter. Full reports will be presented to Cabinet annually, as well as publishing the results. Over time, we will be able to tell if our policies are having an effect.

- For job applicants and recruits, we will analyse how many applications we get from different racial groups as a percentage of the relevant population we are recruiting from.

- We will also analyse the success rates of applicants from different racial groups, both for short-listing and for job offers.

- For existing staff, we will break down the information by grade, so that we can see whether some racial groups are concentrated at certain levels in the authority.

- We will also check whether ethnic minority staff have lower success rates than others in getting promotions, specialist posts, and access to training, or whether they have higher rates of complaints or disciplinary action.

By analysing the data over time, we will be able to tell if any inequalities we find are removed or reduced. We can also assess whether action to promote race equality in employment is working.

Equality Boards will review these measures regularly, and their effectiveness, against the results of ethnic monitoring. In light of this review, we will adjust our strategy if inequality is identified.

How should we publish the results?
We must publish our results every year. Here, the word ‘results’ means not only the statistics and analysis, but also what we are doing as a result of our monitoring. We will publish results within existing publications, such as staff and public newsletters. We will include a summary of our ethnic monitoring results in our Annual Report.

Who is responsible for managing the specific duty on employment?

- The Head of Human Resources will produce an action plan to recommend any change in current monitoring and evaluation systems, if necessary, to meet the specific duty, and identify a timetable.

- Personnel Managers will analyse the information collected to see if there are patterns of inequality that need to be investigated and report results quarterly to Equality Boards and the Race Equality & Stephen Lawrence Implementation Group.

- Equality Boards will review outcomes of employment monitoring every quarter and recommend change, if necessary, to Heads of Service and RESLIG.
8. RACE EQUALITY TARGETS & PERFORMANCE INDICATORS

We currently use the CRE Standard, Race Equality Means Quality, as a means of identifying and prioritising race equality objectives, targets and outcomes. We will integrate the CRE Standard during 2002-03 with the Equality Standard for Local Government as our method of mainstreaming strategic and operational equality performance management. Race equality targets and performance indicators will be incorporated into the Business Plans of each Directorate.

9. HOW WE WILL DEAL WITH COMPLAINTS

The local authority has well-established systems in place to make complaints about our services, recruitment and employment.

We will deal efficiently with any complaints about the ways that we are meeting our general and specific duties to promote race equality, and any other complaints about race equality.

We know that some people may make complaints about institutional discrimination but do not use jargon that Council Officers are familiar with hearing. If we think that a complaint may be about institutional discrimination or any other matter related to race equality, we will record and investigate it as such. We may change this designation if the complainant asks us to do so.

We will pay due regard to the definition of institutional racism when recording and investigating complaints. Institutional racism was defined in the Stephen Lawrence Inquiry Report as:

' … the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantages minority ethnic people.'

We will make sure that all complaints related to race equality are properly investigated, monitored and evaluated. An appropriate senior officer (Head of Service) in each Directorate will present complaints monitoring reports to their Equality Boards on a quarterly basis. Where there are no complaints, they will also report that this is the case. Equality Boards will be responsible for ensuring that any institutional, direct or indirect discrimination is identified and agreeing proper remedial action is taken within a reasonable time scale.

The Corporate Head of Complaints Service is responsible for collating, analysing and reporting the outcome of race equality complaints from all the Council's Service Areas. The Corporate Head of Service will monitor and evaluate all complaints by the racial
groups of those complaining, the nature of the complaint, the stage at which the complaint was resolved, the outcome of the complaint and the remedial action taken in Service Areas.

Who is responsible for dealing with race equality and complaints?

- A Service Head in each Directorate will present complaints race equality monitoring and evaluation reports to their Equality Boards on a quarterly basis, including nil returns.

- Equality Boards are responsible for ensuring that any institutional direct or indirect discrimination is identified, and for ensuring proper remedial action is taken within a reasonable time scale.

- The Corporate Head of Complaints Service is responsible for collating, analysing and reporting the outcome of race equality complaints from all of the Council’s Service Areas in accordance with criteria above. The Head Service will make evaluation reports to Cabinet every six months.

- The Head of Human Resources is required to report to Cabinet and relevant Scrutiny Committees in accordance with criteria set out in the specific duty on employment.