

Appendix 1 – GET’s Equality and Diversity Review 2015/16

1. Working with all our partners to define and jointly address areas of inequality

- 1.1. KCC’s Procurement Team has a clearly stated policy to “ensure there is equality analysis for every specification to cover any additional needs required to complete the contract and promotion of equality in procurement”. The template the Procurement Team uses to assess all planned procurement explicitly asks the service whether an Equality Impact Assessment is required, and emphasises the role of the service in completing one.
- 1.2. As part of the 2015/16 Review, officers at all levels and across all four GET Divisions referred frequently to awareness and understanding of the existence and the relevance of the two interacting policies.
- 1.3. Libraries, Registration and Archives (LRA) can demonstrate ‘best practice’ against this objective around working with partners, with clear and detailed evidence across its 2015/16 Priority Programmes that were delivered locally, where the relevant District Council, Town Council, and Housing Association not only sat on the project boards and the planning teams, but through these demonstrably contributed to the creation and ownership of the Equality Impact Assessments (EqIAs) and resultant action plans that came out. Specifically in 2015/16 these were the Swanley Gateway and the Dartford Library and Museum programmes.
- 1.4. As part of a Heritage Lottery Fund grant application in 2015/16, LRA led on a consortia bid where all partners had to satisfy the Fund that there was a genuine commitment to meeting the intentions of the Equality Duty 2010 through the bid, which was around the Magna Carta community engagement. For these purposes, LRA led on signing up all partners’ delivery programmes to fully consider equalities, including Visit Kent, Faversham Town Council, Canterbury City Council, and Rochester Cathedral.
- 1.5. Highways, Transportation and Waste (HTW) has continued to require the evidence of a bespoke EqIA before funds were released to any third party provider, whether through Local Growth Fund monies, Local Transport Plan monies, or any other 2015/16 commission, including the LED Street Lighting, and Traffic System Term Maintenance Contract. All contracts being procured above the £50,000 KCC Procurement threshold have KCC-created clauses regarding equality and diversity compliance. These require our providers and their sub-contractors to comply with the law and to assist KCC in meeting our duties.
- 1.6. Across Environment, Planning and Enforcement (EPE), a very wide range of statutory agencies were partners of this division’s 2015/16 programmes and projects. All such statutory agencies have legal commitments to implementing the Equality Duty as it applies to their own organisations. EPE will proactively highlight equality aspects to statutory partners when required, as was undertaken with regards to disability and platform and train boarding heights within the Ashford Spurs project.

- 1.7. For EPE's Volunteer Support Warden Scheme, both Kent Police and the Kent Association of Local Councils helped shape the 2015/16 EqIA of this Scheme through the project's working group of which all three partners are members.
- 1.8. The Sport and Physical Activity Service within EPE has a long history of tackling the under representation of women and girls, and of disabled people, in the programmes it commissions or funds. Within 2015/16 it worked with Kent sports clubs, district councils and a number of the National Governing Bodies for individual sports to drive engagement with the highly successful national programme #thisgirlcan. In Kent, to support this programme, we created local engagement tools through #kentgirlscan.
- 1.9. In 2015/16, this service also
- worked with individual clubs to grow incrementally the number of disabled children involved in after school clubs (satellite clubs) with six new targeted clubs established in 2015/16 in addition to the seven that were maintained in the year (reaching 214 disabled children for regular participation throughout the year);
 - supported in partnership with schools and Youth Sports Trust staff to enable 132 disabled children to reach the Kent Sainsbury's School Games Finals (84 boys, and 48 girls). In total, across all the qualification stages of academic year 2014/15 which is the relevant academic year for this Review, 11% of Kent School Games secondary school competitors had statemented social, emotional, or behavioural needs (against a county figure of 6.2%), and 12% had 'other SEN' (against a county figure of 7%);
 - reached 306 disabled young people in 2015/16 through targeted spend of a Sport England funded youth participation programme aimed at 'non-sporty' teenagers, representing 8.6% of all participants in this sector-delivered programme.
- 1.10. Within Economic Development (ED), the Arts and Culture Service has worked within 2015/16 to influence partner organisations' efforts to define and jointly address areas of inequality through requesting and considering the Equality Policy of all bidding organisations to the annually provided KCC Arts Investment Fund.
- 1.11. ED's leadership and management of the Local Growth Fund Rounds 1 and 2 in 2015/16 also saw partnership efforts to address areas of inequality, as the South East LEP's Assurance Framework requires it to observe and promote the Equality Duty as a public sector body, and therefore all grant agreements administered by and through the LEP reflect this. Equality and Diversity assessments and service user consultation are then undertaken at project level, and were therefore undertaken by the specific project team in 2015/16.

2. Promoting fair employment practices and creating an organisation that is aware of and committed to equality and diversity and delivers its Public Sector Equality Duty

2.1. In the summer of 2015/16, GET chose to revisit its approach to Equality and Diversity (E&D), in order to better meet this objective of the KCC Equality Strategy. Focusing on service outcomes, in 2015/16 the GET E&D Group moved to

- Meeting every six weeks, considering a project or priority within the GET Business Plan, both to identify best practice which can be shared across GET and the whole authority, and to identify common opportunities where GET can strengthen its approach in meeting the spirit as well as the letter of the Duty
- Focusing much more explicitly on data collected, and how that data is then used
- Mapping the E&D approach across each stage of the Commissioning Cycle, again to identify and share best practice and common opportunities
- Working closely with the GET Customer Service Programme, as equality information is an essential resource underpinning in part, all projects and programmes' understanding of their customers, potential customers, or excluded customers.

2.2. Since January 2016, GET has periodically brought together its Organisational Development and Equality & Diversity Groups (into an ODED Group) to support the Directorate to work on this agenda in a more integrated and efficient way; linking in the Customer Service Programme and commissioning. This group met again in February, and will now meet every six months, with its purpose being

- to explore equality and diversity opportunities and challenges as they apply to organisational development;
- to similarly explore organisational development opportunities and challenges within the context of equality and diversity;

Through both of these mind-sets, ODED determines how best such opportunities and challenges can be tackled, and appoints agreed individuals or responsible owners who are answerable to ODED for specific actions.

2.3. The priorities this Group worked on in the last few months of 2015/16 focused around

- Identifying what 'expected' and what 'good' look like regarding embedding the Public Sector Equality Duty in recruitment and in line management, across GET, rolling this out for 2016/17
- Making recommendations to KCC's Engagement, Organisation Design and Development Division (EODD) on ways to enhance the equalities aspects of recruitment and induction practices

- Assessing the available E&D data on staff (recruitment, retention, sickness) and commissioning HR to provide further analysis and scope of data to inform the 16/17 work programme of ODED
- Informing the emerging 2017 – 2021 KCC Equality Strategy
- Establishing a requirement that all staff in the Directorate have completed e learning 'Introduction to Equality and Diversity', e learning 'Equality and Diversity in Recruitment and Selection' and e learning 'Introduction to Equality Impact Assessment' within the last three years

2.4 LRA, EPE and ED all conducted significant restructures of at least one service within 2015/16. All of these restructures had EqIAs conducted, which were shared with staff, unions and HR as part of the process. Equality implications identified through these EqIAs included considering and enabling the contributions of staff on long term sick leave or on maternity leave to be part of the relevant four consultations and subsequent recruitment process and eventual structures, the removal of PTE roles having a potential impact on staff with carer responsibilities (two consultations), the need to explicitly address reasonable adjustments for disabled staff, and the introduction of 'standby' to a number of new roles having implications for those with carer's responsibilities or certain religions or beliefs (one consultation).

3. Improving the way KCC listens to and engages with its employees, communities and partners to develop, implement and review policy and to inform the commissioning of services.

3.1. In 2015/16, LRA listened to communities through:

- two full public consultations (regarding mobile libraries, and potential move to a Trust model);
- taking forward the Digitalisation of Archive Records through in part a previous year's survey of randomised 1,000 non-users then profiled against the nine protected characteristics;
- engaging customers through hard copy material posted to their homes (mobile library redesign) and available in all 99 libraries (mobile library redesign);
- in-library displays (Swanley Gateway and Dartford Library and Museum, Kent Reading Initiative) with comment cards and staff interaction;
- User groups (Dartford Library & Museum);
- staff engagement with certain non-library groups including community groups, individual schools, women's refuges, Children's Centres, and Gypsy, Roma and Traveller communities (Kent Reading Initiative, Health and Social Care Integration); and
- across all priority programmes there was stakeholder engagement, website content, social media, and comments cards.

- 3.2. Additionally, LRA is a prolific user of 'About You' which it used to inform all major projects in 2015/16. LRA rolls out 'About You' as part of its annual Spydus refresh, which is the system within which all library membership details are recorded.
- 3.3. LRA in 2015/16 had an extensive list of partners it worked with when shaping services. For the development of Swanley Gateway this included groups with a focus on disabled people (Kent Community Health Trust Health Trainers; Disability Drop In Centre; Kent Supported Employment, Kent Association for the Blind, Hi Kent and KCC Sensory Services for the Hearing Impaired and other sensory Impairments); groups with a focus on age and disability (Royal British Legion, Soldiers, Sailors & Armed Forces Association; Kent County Council Community Wardens) as well as Skills Plus which has a particular focus on meeting the needs of service users across all disabilities, race and gender. This list demonstrates the commitment of this division to improving the way KCC has engaged with partners representing protected characteristics to inform the delivery of services. For the 'Get Kent Reading' Initiative in 2015/16, the list of stakeholders engaged included Kent Sensory Team and Kent Association for the Blind.
- 3.4. Furthermore, in 2015/16 LRA can demonstrate the link between undertaking an initial EqIA and the subsequent engagement with target groups who otherwise may have been missed, including community groups specifically working with older people, long term illnesses, people experiencing mental health issues, and people with learning disabilities, as well as Children's Centres to reach pregnant women and those on maternity/paternity leave.
- 3.5. In 2015/16 as with previous years, HTW regularly revisit customer contact and experience through the Pothole Repair Service random audits, and through the random audits of the Customer Fault Reporting Tool. No issues (opportunities or concerns) relating to the delivery of these two programme and any of the protected characteristics were identified through these random audits.
- 3.6. Kent has not been the first county to implement an LED Street Lighting Contract. To inform Kent's approach, consideration was given to other counties' EqIAs around their introduction, with learning identified in these other EqIAs then applied to KCC HTW's own evaluation of the protected characteristics groups in our own communities which might have been disproportionately affected by the introduction of these lights.
- 3.7. EPE's Sustainable Business and Communities public consultation on the draft Kent Environment Strategy within 2015/16 received feedback that the Strategy in its early form did not reflect young people's thoughts and ambitions. The team were therefore able to improve how they listened to and engaged with this particular group by specifically working with young people to inform Theme 1 Priority 3 of the Final Strategy 'Building Resources, Capabilities, and Changing Behaviour'. The team also continues this by explicitly challenging each activity lead within the implementation plan as it gets developed, to ensure they remain mindful of the EqIA's recommendations, and of the need to capture the views of young people.

- 3.8 In 2015/16, EPE's Sport and Physical Activity Service improved the way it listened to and engaged with customers from certain protected characteristic groups through
- creating new social media friendly tools in order to reach and inspire women to take part in physical activity, through their own personal choice;
 - more firmly harnessing the power of social media to reach certain characteristic groups through using willing members of that characteristic to choose to effectively spread the message to their own existing and personal networks, for example, one Thunderclap (a simultaneous multi user Twitter event) reached 180,685 Kent female residents; and
 - introducing more accessible (and fun) feedback mechanisms for young disabled participants at any of the Kent School Games events (through digital 'quick tap' software).
- 3.9 EPE's Minerals and Waste Local Plan Team hosted public 'drop-in' sessions for pre-submission consultations. In recognition that people with vision impairments might not find out about the consultation if they did not have internet access and/or were not able to read noticeboards or newspapers, Kent Association for the Blind was added to stakeholder database and was informed of consultations and their publication, and information on alternative formats was positioned on the inner side of the front cover of the consultation document where it was more likely to be seen sooner by anyone reading out loud to a person. Additionally, in order to ensure a wide dissemination of the emerging Plan, there was the ability for submission of comments direct into an online system but printed copies of the documents were also made available at all Kent libraries and Kent Gateways.
- 4. Improving the quality, collection, monitoring and use of equality data as part of the evidence base to inform service design delivery and policy decision**
Consistent and clear standards in the use of data in defining service need and managing the performance of services.
- 4.1 Equality and Diversity data collated across the last three years informed the service design of the Dartford Library and Museum. Physical manifestation of that informed approach are the exemplar accessibility of the building for those with physical disabilities or with prams, dementia friendly signage across the building, and a Changing Places toilet which is for people with profound and multiple learning disabilities.
- 4.2 E&D data received by LRA also informed where promotional materials and resources were available in a different language for the Kent Reading Initiative in 2015/16, and likewise for large print and braille promotional materials.
- 4.3 LRA as a Division collects Equality data, as already mentioned, through its Spydus system, which captures as a matter of course (where the customer is willing to share) data around age, gender, ethnicity, and disability. This data is then used to inform all programming, including in 2015/16 the local area based planning around Dartford and Swanley, as well as mobile libraries. Data and subsequent actions around the other

five protected characteristics are then captured as determined by the initial EqlA of that particular programme.

- 4.4 With the exception of Waste Management, HTW do not use 'About You' as a data capture tool, and knowledge of 'About You' is low across the HTW Division, other than in Waste. This is in large part owing to the fact that the majority of this Division's engagement with customers is through commissioned or procured third parties, who have the responsibility to observe and promote equality of opportunity. That expectation and requirement is established through KCC's procurement approach to market engagement, as previously outlined. However, HTW can provide many EqlAs against their 2015/16 priority programmes and projects that featured in the GET 2015/16 Business Plan. These EqlAs formed part of the initial screening before contracts were procured (LED Street Lighting, Traffic System Term Maintenance Contract) or extended (Soft Landscape, Highways Term Maintenance Contract, Highways Condition Survey Contract, and the Resurfacing Contract).
- 4.5 Mosaic profiling and customer insight data has been HTW's preferred approach in 2015/16 and earlier years, for understanding the characteristics of customers using the Fault Reporting Line. Mosaic is a national system which allows UK households to be classified into groups based on many different sorts of information about them. By using Mosaic specific to Kent, developed along with district partners and which draws on a wide range of lifestyle indicators, HTW can better understand the population being served. By profiling actual customer data held by Kent services, HTW gain a deeper awareness of our customers beyond knowing what service they use. These techniques are similar to the approach taken by commercial companies, and in that sense are robust, but they are imperfect in capturing the full extent of equalities information.
- 4.6 For the 18 Highways projects directly being delivered by HTW within 2015/16 through Local Growth Fund monies, an EqlA was run before any individual project moved beyond the conceptual/feasibility stage. Although it is hard to evidence specific changes or alterations in light of implementing E&D data led customer feedback, on directly delivered or contracted highways programmes, there are numerous examples of footway provision, controlled crossings, signage and lighting all being altered in light of customer feedback in 2015/16.
- 4.7 Waste Management within HTW collect information on customers across all 18 Household Waste and Recycling Centres (HWRC) twice a year, and through 'About You' has continued to capture in 2015/16, equality data that the public have been prepared to share. The 'About You' information and HWRC customer postcode data, which is profiled using Mosaic, allows the service to target customers, for example, regarding any changes to services or regarding a particular HWRC, and to mitigate appropriately.
- 4.8 Within EPE, equality data was captured as a matter of course in 2015/16 on all projects formally consulted upon, namely Community Wardens (the consultation was in 2014/15, but its analysis fed into the development of this programme across 2015/16), Kent Environment Strategy, Minerals & Waste Local Plan, and Thanet Parkway. All KCC public consultations draw upon 'About You' data as a matter of course and this therefore also applies to the EPE division.
- 4.9 In 2015/16, KCC Volunteering Programmes, a service based within EPE, rolled out a series of guidance notes and templates to support all KCC teams who utilise volunteers in the achievement of their outcomes. One template/set of this guidance

was around Equality Monitoring; how to go about it, why it should be undertaken with regards to volunteers, and what to do with the data once received. EPE's Volunteer Support Warden Scheme in 2015/16 gathered equalities monitoring information throughout its 2015/16 pilot, to inform the targeted promotion of this scheme in 2016/17 and beyond.

- 4.10 Informed by EqlAs, EPE's Warm Homes Programme and Low Carbon Kent Programme both captured data on gender, ethnicity and disability (and Warm Homes captured data additionally on age, religion and sexual orientation). The data was utilised to support engagement with target client groups of both these programmes.
- 4.11 Although no EqlA has been conducted upon EPE's delivery of the Forest Schools Programme, every Forest School staged is carefully shaped for the attending class, in conversation with the teaching staff who will be accompanying the children. In this way, every Forest School delivered in 2015/16 can demonstrate that the protected characteristics of disability and age have been taken into account. Similarly, in 2015/16 two Forest Schools were adjusted for religious beliefs regarding the food available to toast over the bonfire (marshmallows typically contain pig gelatine), and regarding making natural decorations for a Christmas Trees (not all attending children's families celebrate Christmas). Children not of these specific beliefs enjoyed the sweets and Christmas element of these programmes simultaneously as those children of different beliefs.
- 4.12 EPE's Sport and Physical Activity Service collected data in 2015/16 regarding disabled people's participation in four distinct programmes, and that data has not only fed into the Service's 2016/17's Equality Action Plan, but is now also being used as evidence for the Service to achieve the second highest grade of the sports industry equality and diversity accreditation. If this grade is successfully achieved in October 2016, this will firmly position Kent Sport as a national leader.
- 4.13 ED's delivery of Women Enterprise Kent listened to and responded to the needs of the protected characteristic it was set up to work with, after data led analysis demonstrated an under representation of female-led businesses in Kent. For example, within this programme, users provided feedback around childcare challenges that the programme was able to incorporate within how training and development was provided for its client group by arranging time specific crèches.
- 4.14 Applicants to the Cultural and Creative Industries' business support programme were monitored specifically by disability, race, gender and sexual orientation in response to evidence that these four protected characteristic groups are underrepresented in the creative industries. Similarly, data about these four characteristics was again the focus to understand how these groups could be proactively reached through Arts Investment Fund projects in 2015/16, both in terms of shaping individual projects and being a targeted audience for individual projects.
- 4.15 The Kent and Medway Workforce Skills Evidence Base, published in September 2015, contained demographic analysis of the workforce within the 12 major sectors of the Kent economy. ED did not collect equality data systematically within this programme, but the individual skills providers (sector guilds, and further education colleges) did. Although the focus within 2015/16 was employer demand not learner provision, going forward, publicly funded skills providers will be bound by the Equality Duty.

4.16 A number of 2015/16's priority programmes within HTW, EPE and ED worked with stakeholders directly rather than individual members of the public or communities, and in these circumstances, 'About You' is not a relevant tool.

4.17 Knowledge of 'About You' as an available tool remains similar to last year, across the Directorate, which is moderate.

5. Providing inclusive and responsive customer services through; Understanding our customers' needs; Connecting with our customers effectively and efficiently; Empowering staff to meet service expectations; Improving access to services; Working with our partners to improve our customer experience.

5.1 During 2015/16, a directorate-wide review of customer service was commissioned, as a first step to transform the way in which GET engages with customers. A number of themes emerged including equality and diversity. This was primarily about the quality of customer insight collected relating to protected characteristics and how this is applied to inform service design and delivery. The review identified an inconsistent approach across GET, with pockets of good practice accompanied by areas where skills and knowledge need to grow. An improvement programme for 2016/17 is now underway which includes:

- Further training to support staff to undertake high quality EqlAs;
- Centralising all EqlAs as a learning resource for teams;
- Developing a customer insight library for services to draw from when considering changes and / or developing new service delivery methods; and
- Linking services together where there are similarities of customer needs to achieve a more consistent approach.

5.2. Evidence has been provided earlier in chapters 3 and 4 as to how customer feedback has supported inclusive and responsive changes in service delivery, commissioning or service access within the 2015/16 business year. An additional example of how a GET Division understood customer needs in 2015/16 was the LRA Mobile Library Service Redesign, where a proposed reduction in the availability of the mobile service was consulted on in the same document with three alternative ways for homebound users, who are likely to have at least two of the nine protected characteristics, to continue to benefit from the Service's offer.

5.3 Three of the four Divisions within GET did not receive any complaints in 2015/16 relating to a protected characteristic issue from a member of the public or a stakeholder.

5.4. HTW received one complaint relating to a small scheme funded by LGF/LTP monies. The complaint related to the removal of an existing controlled crossing to be replaced with an uncontrolled but level crossing in a busy high street. The complaint was included in the EqlA for this scheme but after demonstrable consideration, resulted in no change to the design of this aspect of the scheme.

6. Understanding and responding to the impacts on people when KCC is doing its work by; Ensuring we understand the impact of all our decision through knowing our communities and their need; Ensuring that we understand and monitor the cumulative impacts on people of the decisions that are taken within the Council; Ensuring we have a fair decision making process for making good decisions that take the needs of people into account.

- 6.1. Six out of the seven LRA priority programmes and projects within the GET 2015/16 Business Plan had EqlAs in place before decisions were taken. The seventh was Community Engagement around Magna Carta, which did utilise the Spydus data to inform its approach (which collates information on a number of the protected characteristics), did use the intelligence gained from other LRA EqlAs on how to reach certain protected characteristic groups with this programme, and which was assessed for its equality consideration as part of its successful bid to the HLF to part fund this programme.
- 6.2. 12 out of the 16 HTW priority programmes and projects within the GET 2015/16 Business Plan had EqlAs in place or conducted in 2015/16. Those that did not (some Local Transport Programme projects, Improved Procurement Process for Passenger Transport, options for the Young Person's Travel Pass product development, and review of prioritisation of Pothole Repair Service) have nonetheless demonstrably considered equality implications through necessary delivery through the KCC Procurement Framework, or they were simply in the earliest stages of development in 2015/16.
- 6.3. The majority of EPE priority programmes/projects/business-as-usual had EqlAs conducted in 2015/16, or have built upon an EqlA completed within the last three years. A number of those without an EqlA were in the earliest stages of development in 2015/16 and EqlAs were clearly scheduled within their Programme Plans for 2016/17 (for example the Growth and Infrastructure Framework's 22 infrastructure 'action plans' are each having their own EqlA conducted in 2016/17 as they are developed, and the Kent Nature Partnership's Health and Countryside Working Group will be conducting EqlAs as specific programmes of work come out of this group's strategy in 2016/17); a number were KCC responses to Government consultations (Lower Thames Crossing, Operation Stack designs/proposals), and the remaining programmes have either been completed in 2015/16, or have been scheduled as part of the GET Equality and Diversity work programme in 2016/17.
- 6.4. No ED priority programmes/projects/business-as-usual had EqlAs conducted upon them in 2015/16. However, this certainly does not mean that equalities considerations have not been take account of, as shown below:
- No EqlA was conducted by ED against KCC's coordination of KCC services' efforts to secure and utilise the European Structural Investment Fund as this is left to each individual funded programme. To be successful in securing monies through this route, any individual service must demonstrate how they have considered equality aspects, and how their project is reaching residents in "identified geographic areas of deprivation ... suffering from multiple

disadvantage. These include areas where through age, gender, ethnicity and disability, residents face specific and additional barriers...”

- Women’s Enterprise Kent was shaped within the Government Equality Framework, and did not therefore have a ‘local’ (Kent) EqIA conducted
- The Broadband Infrastructure Programme’s funding is mandatorily directed at geographical areas of market failure, and is not permitted to target funding to individuals or groups of individuals. Whichever Internet Service Providers get the subsequent contracts to provide a service through the infrastructure will of course be bound by Equality legislation, through usual procurement rules
- The Kent and Medway Economic Partnership Engagement Programme is a partnership group rather than a service, and an EqIA against the partnership group is not appropriate. A number of projects and programmes across GET have been funded through KMEP channels, and each of these have been successfully assessed against the Equality Duty in 2015/16
- The Ashford District Deal is largely property based, and discussions did not in 2015/16 reach such detail that an EqIA on any individual work strand would have been meaningful.