

The Initial Internal Equality Framework for Local Government (EFLG) Audit Report

July 2023



Sandwell Borough

Sandwell is a local government administrative area created in 1974 following successive local government reorganisations that brought together six boroughs: Oldbury, Rowley Regis and Smethwick in the south, and Tipton, Wednesbury and West Bromwich in the north. Sandwell covers many historically disparate towns and urbanised villages at the core of the Birmingham- Black Country conurbation; places with distinctive identities that flourished along with their many world-class firms.

With post-war economic decentralisation and deindustrialisation, this urban core entered decline. Deprivation intensified from the 1970s, and some neighbourhoods became stigmatised, unpopular and needed housing clearance.

Most twentieth-century housing was council-built, especially in the north and was often of high quality but eventually culminated in concrete estates of flats. In an area of low incomes, some 28,600 homes were still managed by the council in 2019 accounting for 21.6% of the borough housing stock. Sandwell has since the 1980s attracted significant government regeneration investment, often through area-based initiatives. This has addressed many physical problems such as dereliction, poor transport and local facilities, underpinned by a sustained focus on West Bromwich Town Centre. The borough's strategic advantage as a business location has been reinforced. And investment continues with a new hospital, a new Aquatics Centre, the extension

to the West Midlands Metro line, and funding through the Stronger Towns Fund.

Based on the 2021 census Sandwell's population has increased to 329,042. Sandwell is ranked 12th most deprived Local Authority out of the 317 in England. Sandwell is an ethnically diverse borough. 48% of residents are from Black and minority ethnic communities. This compares to 26% in England and Wales. Life Expectancy at birth in Sandwell is 76.1 years for males and 80.7 years for females. Compared to 79.4 for males and 83.1 for females in England. In March 2021, Sandwell had 130,246 household spaces. 54% of households were in owner-occupation, 27% social rented and 19% rented from a private landlord. In March 2021, 29% of Sandwell residents had no qualifications, compared to 24% in the West Midlands and 18% in England and Wales.

Sandwell Council

The Council has 9 Directorates, Surjit Tour Director of Law and Governance is the Lead Director responsible for Equality, Diversity and Inclusion (EDI) and reports directly to the Chief Executive Shokat Lal. The council has a dedicated EDI Service managed by an EDI Manager, who leads on all the council's strategic EDI work, providing support and advice across the council ensuring compliance with legal duties and addressing inequalities relating to workforce, local residents and visitors to the borough. An EDI Roadmap has been delivered which is currently driving the Council's EDI agenda. However, the council recognises it can do more, particularly as this agenda has not had the resources and attention over the past few years.



Introduction

Equality Framework for Local Government (EFLG) 2021

The Equality Framework has been updated to reflect the latest legislation affecting equality such as Gender Pay Gap reporting, the changing context of the local government sector and equality in Britain as well as in response to other significant issues that might affect equality including the UK's decision to leave the European Union, the increased focus on race equality as a result of the Black Lives Matter movement and the health inequities highlighted by the Coronavirus pandemic.

The equality framework is intended to help councils:

- Deliver accessible, inclusive, and responsive services to customers and residents in their communities including those from under-represented groups.
- Employ a workforce that reflects the diversity of the area they are serving.
- Provide equality of opportunity for all staff.
- Meet the requirements of the Public Sector Equality Duty and support any aspirations to exceed these.

The Initial Internal Self-Assessment Audit

The council has asked an independent EDI consultant and EFLG Peer Assessor to undertake an initial internal self-assessment audit against the EFLG criteria.

This Self-Assessment Audit was undertaken primarily from a desktop exercise, with the EDI team researching and collating strategies, policies, plans, information, and data etc., drawn initially from the Council's intranet and internet and in some cases direct contact with key managers for additional information.

The whole process has taken 13 consultancy days. As a result of the short timeline of this audit, the audit may not provide a full picture of all the work the council and its partners are undertaking.

The information gathered for this audit has not been tested/validated (triangulated) by anyone source, e.g., employees, leaders, partners, service-user data/information sources.

LGA EFLG Modules Criteria and Rating

The EFLG sets out four modules for improvement, underpinned by a range of criteria and practical guidance that can help a council plan, implement and deliver real equality outcomes for employees and the community. The four modules are:

- Understanding and working with your communities
- Leadership, partnership and organisational commitment
- Responsive services and customer care
- Diverse and engaged workforce

For each module, there are three Levels. **Developing, Achieving and Excellent.** The levels are progressive and cumulative so an organisation can plan and chart its progression against different priorities. Councils can be at different levels of the framework for different modules or themes. The council has been rated at Developing Level, this criterion contains the basic building blocks for each priority. An organisation at the **Developing level** has made an organisational commitment to improve EDI. It is putting in place processes to deliver on EDI issues and is working towards meeting and exceeding the statutory requirements:

However, to demonstrate the different degrees of Developing, a separate sub-criterion has been developed which is detailed below:

- **Lower Developing** – The council has very little or no evidence which demonstrates that systems/processes/policies are in place to ensure staff and residents with protected groups are being treated fairly in relation to workforce issues, services delivered to residents, their experience and satisfaction levels.
- **Middle Developing** – The council has limited evidence to demonstrate fairness and equity in relation to its workforce and residents,
- **Developing** – The council has demonstrated a high level of evidence (policies, systems, frameworks have been implemented) but not enough evidence on a consistent basis to provide the assurances across the protected groups to enable the council to move into the **Achieving Rating**

For the purposes of this audit the council has been rated as **Middle Developing**.



Conclusion

In conclusion the audit has identified the council's current position, its gaps and where it needs to be, if it wishes to become an EDI leader at regional and national level.

The council has made some major steps towards their EDI agenda and throughout the audit report a number of good practices have been highlighted, however it is the inconsistencies of evidencing of how EDI is embedded across the council that has resulted in the overall council rating of **Middle Developing**. (a full breakdown of all the Four Themes and the sub sections ratings can be found in the separate templates attached with this document).

This information ascertained from the audit will enable the council to make more informed decisions about how it will tackle the issues highlighted in the audit report, update the current Roadmap Action Plan and drive the development of the EDI Strategy.

The audit will support the council in setting its EDI priorities and the direction of travel for the strategy. The audit has created the building blocks for the EDI agenda.

To support the outcomes from the Audit, Report the following two issues will need to be addressed to ensure the successful delivery of the EDI agenda:

- **Appropriate resources** will need to be available across the organisation to meet this big agenda, this includes a fully supported and resourced EDI team
- **Internal EDI Governance structure** – implementation of a strong robust internal governance structure to ensure accountability and responsibility for the implementation of the Roadmap Action Plan and the future EDI Strategy development and implementation.

The audit highlighted a number of emerging themes from the evidence collection period:

- **Data capture** - (disaggregated) monitoring and analysis of EDI information
- **Effective Decision making** - completion of robust evidence-based Equality Impact Assessments for all decisions
- Provide and deliver a range of **EDI Training** for all staff
- **Effective Community Engagement** systems in place for all residents and communities across the protected groups.
- **Lack of up-to-date strategies/policies** from key directorates/services
- **EDI Compliance**

Next Steps

It is envisaged that the gaps highlighted in the audit will be incorporated into the Roadmap Action Plan and some quick wins will be identified to continue with the already good work that the council is undertaking, this will include:

- the establishment of an Internal EDI Governance Structure
- effective decision-making process to be implemented review the emerging themes as areas of priorities
- information from the audit will be used to support the development of the EDI Strategy

The Action Plan and the EDI Strategy will hopefully put the council in a much better position should a similar audit be undertaken in the future.



Section One: Understanding and working with your communities

1.1 Collecting and Sharing Information

Strengths

From the evidence collected, the council has a very good understanding of its communities, this is drawn from a wide variety of information which is accessible via the Sandwell Council website to managers, partners and residents to enable them to fully understand the population and to support managers and partners in relation to service delivery and addressing population needs. Some services and partnerships have in place information-sharing protocols, but it is not across all services.

The main borough data available is based on national data and therefore is already broken down by the majority of the protected groups, including health-related issues and deprivation. Examples of some of the data:

- 2021 Census data
- ONS links
- National data sets for crime and prevention, modern slavery, sexual exploitation
- Sandwell Trends based on Census 2021 data – interactive site driven by Power BI system
- Sandwell Trends - General facts and figures for each of the 6 towns (demographic) and overall data for the borough 2021
- Joint Strategic Needs Assessment (JSNA) (incorporated into 2030 Vision)
- Over-arching JSNA – deep dives are undertaken to identify specific needs, e.g. diversity, deprivation, risk of violence, violence repeat offenders following 10 young people, health, schools, police data, probation data
- Healthy Sandwell
- Community Teams data (inc. ethnicity, age, disability, sex, communication needs, pregnancy)
- Skills and Employability team's data (inc age, disability, sex, ethnicity)
- Safer Sandwell Partnership (Hate crime data, domestic abuse, anti-social behaviour)
- State of the Borough – previously produced but not for a few years, awaiting content for a new report

Service Data

- Public Health have incorporated the category 'Sikh' as an ethnic group, this is now captured in all areas of work as well as contracts
- Housing Data (some demographic data is collected but not all services – we did not get a response in relation to any specific data relating to protected groups)
- Homelessness and Rough sleeping data 2022/25
- Community Profiles based on the Community Development National Occupational Standards
- Electoral role system
- Customer Services but not broken down by protected groups
- Registry and Bereavement Services
- Hate Crime/Domestic Abuse
- Population needs Assessment
- Surveys (no EDI data is collected)
- Emotional Wellbeing data - children and young people (recently started to collect protected group data)

Sandwell has developed a range of approaches and techniques to provide assurance that Key Performance Indicators (KPIs) are being correctly collected, calculated and reported, and that the calculation can be evidenced for inspection purposes. Processes include identification of 'high risk' indicators and internal audit of the KPI calculation and data source, broadening over recent years to focus on quality assurance checks relating to the underlying IT systems - with 'deep-dives' into associated data recording and data inputting processes.

Data Quality Toolkit includes for example:

- Robust Target Setting Process
- Outturn Proforma and Process
- How2 Guides
- Data Quality Strategy
- Sandwell Trends

Good Example

Public Health Teams are responsible for the production of the JSNA which draws upon a range of data sets across different partners to produce the JSNA. These are then published on the Council's website and shared with key partners and other key stakeholders.

Areas of Development

From the evidence collected it appears that as a council there is some inconsistency across Council services about what, how and when to collect data and then what to do with the data on the occasions when it is collected. Some services stated that they do collect demographic data but, this data is never requested.

The desktop research exercise could not find a standard EDI monitoring form, that services use to collect EDI monitoring data from their residents, service users, customers etc., to fully understand service access, delivery outcomes and experience, from what we can ascertain, even when it is collected it's not disaggregated.

The lack of EDI data collection was specifically highlighted in relation to the Customer Services Team (Gov Services Solution - system for customer services), who had undertaken data collection for all customers who accessed their services, however they did not capture data by protected groups and wasn't familiar with the term protected groups.

The desktop exercise also highlighted that there was a lack of data included in Equality Impacts Assessment, this is borne out by the lack of EDI data collected across the council at service level.

It should be noted that as much as the council has demonstrated a good range of data sources to fully understand the population and their specific needs, the evidence was not so forthcoming to show how this range of data was being used to assess population need and inform the planning of services and contribution to better outcomes.

We can only find data collection at a service level across three protected groups. Not sure how this decision was agreed. An exception to this is Adult Social Care who collect more than three characteristics, they regularly use this information in Equality Impact Assessments in relation to contributions, consultation and policy.

Through the guidance from IMU there may be a reluctance for staff to collect EDI monitoring data, as there is a concern regarding GDPR. However, there are ways to collect this data without contravening General Data Protection Regulation (GDPR).

Specific Development Areas

- Standardise EDI Monitoring Form for services to collect EDI data
- Develop data sharing agreements with partners, to build up a clearer picture of residents by protected groups, disadvantaged and vulnerable groups at service level/ward and neighbourhood levels.
- Establish formal training or awareness sessions for staff to understand the importance and benefits of capturing, monitoring analysing EDI data.

1.2 Analysing and Using Data and Information

Strengths

The council has a range of systems that is used to support the collection of data, e.g., Power BI, Gov Services Solution, Firmstep Referral system (client record system).

Examples of how the council has met this criterion, is in relation to the work undertaken by the **Electoral Team** and the **Adult Social Care teams** during the COVID Pandemic. A range of data sets was collated and analysed to support the most vulnerable residents across the borough to ensure they received appropriate Care Packages, that met their specific needs.

The Public Health Team are developing a range of JSNA's that will take a 'deep dive' around specific targeted groups, e.g., diversity, deprivation and risk of violence to name a few. These deep-dive documents will enable services to target the most vulnerable across the borough and develop appropriate services to meet their local needs.

Good Examples

- **The Electoral Team** use a range of data sets to build demographic profiles in preparation for elections (they have a statutory regulation which allows them to access all council databases to ensure that they have the most accurate data about the population who is eligible to vote. These include council tax, council tenants, Revs & Bens, Care Homes, HMOs, Blue Badge, schools' data etc). They also have a data-sharing agreement; this information is kept for no longer than 12 months.
- This approach was particularly successful in encouraging take up of the Voter ID Campaign. The Electoral Team accessed a range of data sources to prepare for the most recent local elections and to encourage take up of Voter ID. They have been recognised for this work as best practice.
- **The Community Safety team** has a range of systems that assist with analysing soft and hard data intelligence about communities and the information is disaggregated to support the assessment of local needs, impacts and changes to services and priorities.
- During COVID the Public Health team receive the National Public health team award due to the work with the community and faith sector, figures of uptake of vaccine in faith sector were low, the team provided culture specific presentations and dispelling misinformation in the community such as non halal vaccines



Areas of Development

Similar to 1.1 above, it should be noted that where service data is collected, it is often not broken down by protected groups or disaggregated and rarely is reported unless it is a specific requirement. This is also borne out by the lack of equality data included in the Equality Impact Assessments.

Service data that we accessed via the council's intranet was often out of date and therefore we could not include as part of this exercise. Therefore, they may be other areas undertaking data collection, analysis and disaggregation across the council. However, with the limited time allocated to the desktop exercise we were unable to evidence this and be confident that all or the majority of services are collecting, disaggregating, analysing and then using that data to drive service and resident/customer improvements. No consistency across the organisation on KPI's and service metric relating to EDI.

However, it was difficult to find how the systems are being used to disaggregate, analyse soft and hard data intelligence about communities, their needs and aspirations.

Specific Development Areas

- Ensure data is regularly collected and published on websites
- Remove out-of-date data from websites
- Services need to get into the habit of disaggregating and analysing data across the protected groups to assist with local needs and impacts.
- EIA template to be revised to emphasise the importance of referring to data – EIAs should be evidence-driven.
- Better consistency across the organisation in collecting KPI's and service metrics relating to EDI
- Be more data led, auditing which departments who are not being consistent with the EDI approach

1.3 Effective Community Engagement

The council has a duty to engage and consult with members of the public about decisions that may affect the services they receive, this can take the form of consultation, engagement, participation and co-production. The council has recently published the Corporate Consultation and Engagement Principles and Standards via the Weekly News bulletin in June 2023.

These Principles and Standards aim to ensure that consultation and engagement activity offers opportunities for residents to participate, and that this intelligence is fed into the council's decision-making which is paramount and is a central consideration for future work. Particular areas of focus include:

- Ensure people with one or more protected characteristics have the same opportunity to participate and we put in place inclusion measures to encourage and enable residents to access our surveys, with reasonable adjustments if needed
- That the data gathering ensures we are asking the right questions to understand what our diverse residents think about our services and about their experiences of living and working in Sandwell.
- In particular, what difficulties/challenges/barriers they have or are experiencing as a Sandwell resident with one or more protected characteristic(s)

Other ways that the council engages with its residents is through the 6 towns, where established engagement mechanisms are in place and supported by the Town Leads.

Councillors hold a range of regular surgeries across their specific wards and more tailored engagement activities will take place where necessary, e.g., Cllrs will engage with residents in their wards some will do street surgeries or ward walks, or they may send out mail drops, or use social media to engage with their constituents.

Other forms of engagement mechanisms have included 'Councillor Calling Card'. These are cards that are posted through the homes of residents. The card asks if the resident would like the councillor to return to visit them. This visit will take place, by the resident displaying the card in their window and on the councillor's return visit to the area, they will then knock on the resident's door to speak to them.

The Skills and Employability Service works on an outreach basis within community locations including culturally diverse organisations to enhance the reach of the service. The service is tailored to meet individual needs, including bespoke services according to age, gender, disability and cultural needs. For example, Sandwell Adult Family Learning deliver provision from Confederation Bangladeshi Organisation.

The Skills and Employability service organised an inclusive Disability employment event in June 2023. The event was specifically for people with disabilities and showcased jobs, apprenticeships, training and internships. BSL interpreters were onsite to support communication and appointment slots were kept to a minimum to accommodate to individual's anxieties and those with neurodiversity.

The Skills and Employability Service delivered a 50 Plus project across the Black Country. This was commissioned in Sandwell to voluntary sector partners and included co-production of participants to shape their action plans and journey. For example, this led to men's friendship groups which tackled social isolation as a legacy of the pandemic. The delivery model was fluid and didn't follow traditional employment programme models, ensuring engagement activities and locations would be attractive to the age group.

SHAPE Youth Forum has now been in operation for 5 years and emerged from the former **Youth Parliament in Sandwell**. The Forum meets fortnightly. The SHAPE Youth Forum is an integral part of Sandwell's Child's Voice Initiative, the SHAPE Programme. It is a valuable tool to involve young people in continuing development of the borough of Sandwell. Members provide a voice for young people across Sandwell and have been consistently used as a consultative body for various initiatives concerning young people. The roles of the SHAPE Forum are that:

- Two Youth Police Crime Commissioners are elected in Sandwell who will be part of the forum and will join the West Midlands Police and Crime Commissioner's Youth Commission to look at community safety issues including Child Sexual Exploitation (CSE), radicalisation and prevent.
- Two Members of Youth Parliament and Two Deputy Members of Youth Parliament will be elected and become part of forum and will join British Youth Council representing Sandwell.
- The forum is supported by SHAPE Project Manager, SHAPE Project Support Officer, Young People's Digital Communications Officer and Youth Services Manager.

Sandwell Metropolitan Borough Council Play Service Go Play are undertaking a play sufficiency assessment 2023 -24

Play sufficiency is about making sure children have enough time, space and permission to play throughout all aspects of their lives.

Play Sufficiency is a legal duty in both Wales and Scotland and adopting the principle of play sufficiency is recommended by the UNCRC as a part of General Comment 17.

Sufficient opportunities for play are key to children's enjoyment of the cities, towns and communities they live in and are an essential part of any child-friendly initiative.

The assessment will help the local authority

1. Identify conditions that support play which need to be protected.
2. Identify factors that serve to restrict children's play.
3. Identify gaps in information, service provision, partnership working and policy implementation with regards to children's play.
4. Highlight or suggest ways in which these gaps and constraining factors might be addressed.
5. Provide a monitoring system, generating 'baseline' evidence with which future developments can be compared/evaluated/assessed.
6. Involve a wide range of partners in considering the sufficiency of children's opportunities for play.
7. Improve people's collective knowledge and understanding about the conditions that support children's play and the ways in which these can be protected and improved.

Play Sufficiency focuses on embedding consideration of children's right to play within organisational systems and developing an organisational culture best suited to supporting children's play.

The initial assessment provides a thorough account of the ways in which spaces, services, practices and policies currently work across the region to support or constrain children's opportunities for play. It also provides an opportunity to identify ways in which adult-run organisations can improve their responsibilities towards children and their play. This will in turn inform the development of a strategic action plan aimed at cultivating more favourable conditions for children's play, resulting in children's and adult's increased satisfaction with opportunities for play.

The assessment and subsequent action plan will explore and influence work across a wide range of departments, including those associated with policy development and strategic partnerships, the built and natural environment, and community and children's services

Public Health undertook consultation/engagement with LGBTQ+ community, to look at the health inequalities of this community. This took the form of a digital survey of 45 questions and also a discussion with community groups and individuals focusing on their experiences with health care (over 75 contacts). A key outcome has been the proposal to run a small grants scheme with Sandwell Community and Voluntary Sector Organisations (SCVO) to support the council to address health inequalities. The fund seeks to bids from community organisations that can meet the needs of this protected group.

The Public Health (PH) - Healthy Sandwell and Partnership. The aim was to get Sandwell healthier, happier and to keep people well for longer. **"Bringing together skills and knowledge to prevent, protect and promote the health and wellbeing of Sandwell"**. This was achieved by providing advice, and information on health and lifestyle improvement support services, carrying out behaviour change motivational conversations and enabling accessibility to these services by referring to PH commissioned services and signposting to other local support services.

The council has developed a **Statement of Community Involvement** (July 2022), which sets out guidelines on how it undertakes consultation in relation to regeneration and planning. This statement is aligned to the Planning Act 2012 legislation.

There is a good relationship between the Council and the Voluntary and Community Sector. The Council is currently developing a Voluntary Sector Strategy based on the recommendations from the Improvement Plan and an Equality Impact Assessment will be developed throughout the strategy development. There is also a Compact Agreement in place between Sandwell's Voluntary and Community Sector (SCVO) and the council and it sets the tone of their relationship. The SCVO is supporting the council to deliver Vision 2023, with the support of the other local community and voluntary organisations across the borough.

The council provides a wide range of support including funding, discretionary rate relief, access to meeting spaces information and training. The voluntary and community sector provides, local community-based services, choice, independence, opportunities for people to participate - as volunteers as well as service usability specialist services. The council works across the borough with voluntary and community organisations from across the protected groups and other marginalised and vulnerable communities.

Various grants/funds are available for the local community and voluntary sector that they can access to enable them to deliver specific initiatives on behalf of the council. The **Sandwell Health Inequalities Programme** (SHIP) is an example of one of the fund/grants available to local community and voluntary sector organisations. SHIP is a three-year grant-funded programme developed with local community organisations. It aims to deliver health improvement for local residents through a varied programme of activities in 11 community centres across Sandwell.

Each of the 11 community centres will run activities over three years, including projects to tackle childhood and adult obesity, Zumba classes, maternity and women's health groups, exercise groups for over 50s, postural gentle exercise for older residents, a community swimming group, and football sessions for adults and young people. There are also multiple activities aimed at preventing and managing diabetes, cancer and other long-term conditions. These are complemented by wellbeing activities, social groups and coffee mornings in local community settings, which bring people together, to reduce isolation and improve mental health. The majority of the organisations responsible for delivering SHIP are from across ethnic minority communities and voluntary groups.

The council has a range of guidance documents to ensure that all events and meetings are accessible, these are:

- Guidance on accessible venues
- Guidance on communication support
- Guidance on providing information to residents

Residents and community groups are being asked for their views on the **Sandwell Borough of Sanctuary Strategy**. This consultation is taking place on **Citizen Space** and will run for a 6-week period from Tuesday 20 June until Tuesday 1 August. Through a mixed method approach 119 responses were received. There were 67 respondents via the online consultation on Citizen Space and a collective response from 12 service users at Brushstrokes alongside approximately 40 attendees at the first workshop.

Workshops with individuals with lived experience of seeking sanctuary in Sandwell and with community partners are planned for September to develop the action plan alongside council officers.

The strategy was considered at **Safer Neighbourhoods and Active Communities Scrutiny Board** on 5th July 2023 for comment.

This strategy sets out the Borough of Sanctuary Sandwell Network and Sandwell Council's commitments to welcoming and integrating individuals and families who arrive in Sandwell. The working strategy is being developed between the Council and Sandwell's local Borough of Sanctuary Network, which is made up of local organisations (particularly the voluntary and community sector and public sector organisations), council officers, residents and councillors who support individuals and families arriving in the borough.

Developing the strategy is a required step in the application process to become a recognised Council of Sanctuary. The strategy is for five years with a review built in after the second year to ensure our approach continues to align with our vision and objectives and best enables us to support those arriving in Sandwell. An action plan will be developed to sit beneath the strategy, with actions relating to key themes that relate to Sandwell's six strategy objectives.

During April a consultation exercise was undertaken with over 40 attendees to understand what a **'Welcoming Sandwell'** looks like and to establish the approach needed to become a borough of sanctuary for all. The consultation workshop included representation from local and national groups, residents, the council, and people with lived experience of seeking sanctuary in Sandwell to understand what issues meant the most to them. The Community Partnerships work with a range of communities and Voluntary and Community Sector (VCS) across the borough. Through the use of 25 community centres across the borough, who are mostly managed by the voluntary sector which means they are rooted within local communities but also able to deliver services relevant to the needs of the area and accessible to all communities, providing a range of activities from support groups, dance, crafts, physical activity, lunch clubs, youth clubs, faith activities and older people activities.

The centres act as a space for communities to gather, feel empowered and build confidence and capacity, and often a catalyst for developing community activity and creating a sense of belonging.

In addition, the Council has implemented a Neighbourhood Partnership Team who have been able to work extensively with local communities, tenants and residents as well as organisations ensuring that tenants and residents' voice is clearly heard and develop their ability to act and are represented in identifying local priorities.

The team are multi-skilled and experienced officers with a track record of success and delivery across Sandwell's vibrant and diverse communities. The team has two experienced community development workers in each town. The officers have developed a strong dialogue with their voluntary and community sector partners to explore new ways of developing local activity, delivering local services and building local infrastructure.

They are working effectively as catalysts within their neighbourhoods to bring people and organisations together so that they can work co-productively. The team take the Asset Based Community Development (ABCD) approach and co-production which has enabled activity to grow and develop from grassroots level and is more sustainable in strengthening local provision and activity.

examples of work undertaken by the team are:

- have worked with communities and VCS to develop projects that support; improving mental health, combating social isolation and improving digital inclusion, such as the Digital Donation Scheme, Health Walks, Food Growing projects and activities for older people and young people.
- enabled the delivery of Cost of Living training that was rolled out to all Warm Space providers across the borough.
- utilising previously inaccessible spaces and working in conjunction with Housing staff, passionate tenants and VCS who want to influence change and ensure that communal spaces are becoming more accessible and utilised by local people.
- developed strong relationships with the VCS and have supported many new groups. A total of 223 VCS groups have been supported in the last 12 months. The team have supported new groups to become formally constituted and receive funds from both the council and external grant giving bodies.
- have led on establishing and guiding the Tenant and Leaseholder Scrutiny Group (TLSG). In 16 months, this has enabled tenants and leaseholders to influence local services and hold senior officers to account. A total of 1,420 hours has been committed, with a monetary value of £22,393.
- have worked collaboratively and for the first time have supported a Tenants and Residents Association (TRA) to successfully apply for Holiday and Food (HAF) funding, which has enabled a grass roots organisation in the heart of Tipton to deliver a service to local families in need
- instrumental on the Armed Forces Partnership Panel, ensuring that the Council is upholding its new Covenant Duty that came into force in November 2022. (The Armed Forces Act 2021 imposes a duty on local authorities when exercising certain aspects of public functions in the three key areas of Housing, Healthcare and Education).
- worked tirelessly to alleviate the cost of living crisis. For example, in Tipton working collaboratively with LEAP (Local Energy Advice Partnership), South Staffs Water and Welfare Rights, they delivered financial support totalling £113,606.50.
- worked closely with several VCS groups to support their applications for the King's Awards for Voluntary Service, celebrating and recognising outstanding work delivered by Sandwell's VCS groups and volunteers

Tenant Engagement Framework:

The Community Partnership Team have been working towards a review of tenant involvement and engagement mechanisms and to reflect legislation. They have developed an approach that is consistent, transparent, inclusive and grows the sector. The work discussed below will contribute to key aspects within the Social Housing Regulation Act 2023 and the Housing Directorate.

In addition, the Tenant and Leaseholder Involvement Model provides the basis for all tenant and leaseholder involvement, and the plan outlines key activity/actions that will enable the model to be embedded.

The Tenant and Leaseholder Involvement model outlines the different levels of involvement and acknowledges that tenants and leaseholders may want to get involved in informal to formal activity, but also for varying length of times, and in different ways according to their preference, all of which is welcomed and supports the range of opportunities available.

The framework is underpinned by the following themes:

1. Develop a strong and robust resident voice in Sandwell.
2. Provide support and training for both officers, tenants and relevant stakeholders to achieve agreed aims.
3. Develop key documents and satisfaction measures to underpin the resident engagement strategy in Sandwell.
4. Develop relevant groups, panels and mechanisms to enable the delivery of the strategy

The above framework has seen the development of the Tenant and Leaseholder Scrutiny Group, comprising of 8 tenants and 2 leaseholders who reflect the diversity of Sandwell and are working on scrutinising housing services but also influencing and shaping service.

In addition, the Tenant Auditors Group is another strong group of tenants who are working alongside the above group but also taking a deep dive into a range of housing services and providing recommendations as to ways the Council can make further improvements.

Sandwell has a range of Tenant and Resident Associations who are focused on activity at a local level and supporting to improve areas and develop community-based activity.

The team have supported tenant engagement on the following:

- Review of the Annual Report 2021/22
- Review of Housing Website design/layout
- Five Year Housing Strategy 2023-2028
- Planning for Sandwell Tenant Conference 2023
- Changes to Disabled Facilities Grant
- Building Safety

Good Examples

Citizen Space offers a platform to consult consistently and visibly, to feedback on outcomes and importantly to be transparent. So far 10 surveys have been published using Citizen Space across 6 Directorates and 264 responses have been received. There are currently 5 surveys due to go live. There have been some queries regarding what diversity monitoring data needs to be captured when using the platform. I.e., different teams are asking different questions, and this may need to be standardised.

The Council is currently undertaking Consultation exercises as they develop the platform. One of the key consultation exercises is the **Borough of Sanctuary Strategy**. The platform is still being rolled out across the council.

The Council's Housing team hosted on 1st July 2023, a **Tenant's conference** with approx., 100 tenants in attendance. Attendees came from diverse backgrounds e.g. ethnicity, age, disability and gender. Tenants were represented from the 6 towns in Sandwell. They targeted tenants to ensure that the event was represented.

The new approach to resident engagement ensures that any It ensures that consultation and engagement activity offers opportunities for all of residents to participate, and that this intelligence is fed into the council's decision-making, is paramount and is a central consideration for the Group. Particular areas of focus include:

- Ensure people with one or more protected characteristics have the same opportunity to participate and we put in place inclusion measures to encourage and enable residents to access our surveys, with reasonable adjustments if needed.

That the data gathering ensures we are asking the right questions to understand what our diverse residents think about our services and about their experiences of living and working in Sandwell. In particular, what difficulties/challenges/barriers do they have or are experiencing as a Sandwell resident with one or more protected characteristic(s). Public Health have a designated faith sector lead, who works with the faith communities linking them in with Public health programmes and enabling targeted approaches

Public Health have recruited 3 team members specifically to broaden the languages spoken in the team including Bengali, Punjabi, Urdu and Polish.

During COVID the Public Health team receive the National Public health team award due to the work with the community and faith sector, providing culture specific presentations and dispelling misinformation in the community such as non halal vaccines.

The Neighbourhood Partnership Team is a resource focused on working with all communities, reducing inequalities and empowering all communities to get involved, develop and build local capacity and strengthen local infrastructure.

The council provides a range of grants to the voluntary sector, many represent various communities, demographics and communities of interest and this enables and support a broader reach into communities through routes where there are already trusted relationships.

Development Areas

The breadth and range of community and voluntary organisations that the council engages with, is impressive and from the evidence received it appears that different officers have good relationships with the local community and voluntary sector organisations.

We were not able to get a full picture of how many times the different communities are engaged and how the funding/grants are allocated fairly and equitably across the different community groups and organisations.

From the limited information gathered, the council has systems in place to encourage and enable participation from protected groups in relation to decision-making. However, it will have to be caveated, that without specific data this audit cannot confirm how robust and fairly this happens across all services, there appear to be pockets of good practice, where engagement is good. However, it is not consistent and therefore more robust practices and monitoring will need to take place to ensure that equity, fairness and transparency of all areas of this criterion is taking place across the council.

The use of Equality Impact Assessments would help to ensure that fairness and equity applies across everything the council does and ensure transparency, particularly when it comes to engaging with the local communities and allocation of grants/funds.

Specific Development Areas

- The development of a specific Community Engagement Strategy
- Ensure that the new Corporate Consultation and Engagement Principles and Standards have EDI issues and considerations embedded within it
- Review EIA template to emphasise the need for community engagement at the outset of service review/development
- Review EIA to ensure that an EIA is undertaken at the development stage of any new funding/grant programmes
- Ensure EIAs are completed robustly for all engagement/consultation and participation activities
- Ensure that officers are using the Accessible Events Guidance in all activities that involve the local community
- Review community and voluntary sector organisations list and broaden engagement with smaller, new and emerging communities, not just the usual suspects
- Learn from existing successful engagement activities, share and roll out good practice
- Refresh the EDI-related content on the Council's website. Use this page to signpost to community groups/organisations and about what support and resources are available
- Develop bespoke communications for different communities across the borough to improve take up and access
- Work with partners to properly understand the health and wellbeing inequalities within the different ethnic communities.

1.4 Fostering Good Community Relations

Strengths

Sandwell Council is proud of the Safer Sandwell Partnership (SSP), which drives the agenda for ensuring that the council fosters good relations. The SSP brings together the Council, Police, Fire service, Health and Probation services. The Safer Sandwell Partnership also works closely with the Sandwell Safeguarding Adults Board, Children Safeguarding Partnership and Sandwell Health and Wellbeing Board. How the boards work together can be found in the Sandwell Strategic Partnership Boards Partnership Protocol. The SSP is supported by the Sandwell Community safety strategy 2022 – 2026 and a supporting action plan. The SSP's vision is:

- **'to ensure that communities of Sandwell feel safe, protected and confident in their homes and neighbourhoods.'**

The partnership is chaired by The Chief Superintendent (WM Police) and has Councillor representation and has three themes:

- The prevention of violence and exploitation
- Reducing offending, reoffending and serious organised crime
- Preventing crime and antisocial behaviour in our neighbourhoods

Hate Crime in Sandwell is monitored and addressed via the Town and Borough Tasking arrangements (Safer Sandwell Partnership Police and Crime Board). Hate Crime is supported by a multi-agency plan outlining the commitment of Sandwell Council, Sandwell Police and partners to tackle hate crime over the next 12 months, which sets out actions across 4 thematic priority areas. The Hate Crime Group operates by:

- Collaborating with partners to identify opportunities to implement early intervention in order to prevent hate crime
- Addressing reporting gaps by increasing confidence in victims and communities to report hate crime and overcoming barriers to reporting
- Ensuring effective action is taken in response to hate crime and improve outcomes to provide justice for victims of hate crime
- Ensuring that Hate crime victims and wider communities to have vulnerabilities recognised and receive the support that is needed
- Supporting the 3rd party reporting centres across the community and voluntary sector settings. Here residents can report hate crime incidents and get support and information relating to incidents that they have experienced.

Hate Crime data collected includes school data and currently the borough has no specific hot spots for hate crime, race is the highest area in relation to hate crime reporting and the majority of cases relate to neighbourhood disputes which are picked up by the Housing Teams.

Other groups that sit under the SSP are:

- **The Prevention of Violence and Exploitation (PoVE) Subgroup** is a strategic subgroup of the Safer Sandwell Partnership Police and Crime Board. It is responsible for the co-ordination of the work of partners to ensure that the Safer Sandwell Partnership Community Safety Strategy and Action Plan for Prevention of Violence and Exploitation (PoVE) is effectively delivered in close co-operation with Sandwell's Health and Wellbeing, Adult Safeguarding, Children's Safeguarding and Domestic Abuse Boards. Objectives, targets and performance indicators are laid out in the Prevention and Violence

and Exploitation Strategy & Delivery Plans.

- **Domestic Abuse** also sits under the SSP and the latest figures show that during April 2018-March 2021 data (taken from Community Safety Strategy 2022-2026) - Sandwell offered support to 1973 high-risk domestic abuse victims.
- Black Country Women's Aid were funded to provide specialist support to at least 5466 victims of domestic abuse and their families, 24,118 children have been referred to its Multi-Agency Safeguarding Hub (MASH) due to domestic abuse.
- The council has a dedicated **PREVENT Team**, the team is funded by the Home Office. It's a standing item on the SSP agenda. The council works with the IMAN Network which was established over 5 years ago. The team now employs a community engagement office and a youth officer who works with the young people of the borough.
- The aim of the team is to get into every faith and community organisation across the borough to raise awareness about radicalisation. They also support and deliver online safety training and respond to community tension, defusing situations/incidents, sharing information and dispelling misinformation. They work via referrals. They do not hold any data about training and contact or names of community/faith groups., but they do record ethnicity or religion.
- The council has a **Modern Slavery team**, who work in partnership with a number of partners. The team is intelligence led and use a Power BI interactive dashboard which includes nationality, localities, landlords and recruitment agency data. The council has annual statement reports. The team work on all areas that come under the remit of modern slavery and the data is benchmarked against national data and Sandwell is showing that they have the same issues as other local authorities. Due to Sandwell's unique location as it borders the majority of the other larger West Midlands authorities, these issues are coming from all areas across the region and further afield.

Some examples of various community events that support fostering good community relations that has council representation, a more detailed list is available from the Events Team and the Mayor's Office:

- Summer Diversity Festival at Ferndale Primary School
- Sikh Helpline Scotland to Birmingham Bike Ride
- Presentation of Sandwell Shield to Veterans Club
- Sandwell Visually Impaired Forum
- Photo Shoot for LGBT+ West Midlands Voices Exhibition
- Sandwell Autism Café at the Clock
- LGBT - Month Activities
- Juniper Training Apprenticeship
- SHAPE Your Talent
- Age UK
- Public Health Wellbeing events at the faith centres, including Gurdwaras, Muslim temples, Christian churches led by the Black Caribbean community.
- Community Centres and community facilities that encompass a range of community-based activity
- Neighbourhood Partnership Team working locally with range of communities and supporting and stimulating community based activity and celebration of such communities.

Good Examples

The June Community Safety Bulletin that is distributed to over 14,000 subscribers had a specific focus on safer communities which included the following themes:

- **Sandwell Council agrees five-year contract with a charity to support domestic abuse victims**
- **Vulnerable resident safeguarded**
- Sandwell Council has announced a **five-year agreement with Black Country Women's Aid** to provide accommodation and support for victims of domestic abuse and their children.
- **Safe Spaces information stand at Sandwell College**
- Sandwell Council's **Community Safety Team** alongside West Bromwich Business Improvement District (BID) visited Sandwell College to raise ongoing awareness of the Safe Spaces Scheme in West Bromwich Town Centre
- **Safeguarding Champions training in schools**
- **Crime prevention community events In Smethwick**
- A number of **crime prevention** events have been taking place across Smethwick at various locations including Bearwood Hub, Abbey Primary School, Bearwood Baptist Church, Brushstrokes, New Beginnings, Thimblemill Library and Smethwick Pantry.
- Sandwell Council's **Community Safety Team**, working with the Smethwick Neighbourhood Police Team, has been engaging with local residents, providing advice and tips on how to keep themselves and their property safe while also giving out free personal and home security items.
- **Boxing mentoring programme for Sandwell pupils**, this mentoring programme has seen pupils from various Sandwell schools work on achieving positive wellbeing through boxing training over a 12-week programme.
- Community Award events celebrating and recognising communities
- The Neighbourhood Partnership Team worked with Community Safety, engaging Third Party Reporting Centres and developed a Hate Crime awareness video specifically aimed at minority communities



Areas of Development

This area had a lot of evidence, however, the evidence is based on the desktop exercise, and as a result the information for this section was not tested or validated, through the experiences of those residents that have experienced any form of hate crime, domestic abuse etc to hear their views of how the services etc are working for them and their personal experience. The only support mentioned was victim support which is funded by the council.

The team however stated that all reports go to the police, it would be good to know how many are actually recorded as hate crimes/domestic abuse and what action is taken against perpetrators and how is that reported in the media as that would provide trust and reassurances to the communities that these incidents are taken seriously.

The Annual report did not appear to break down the data or disaggregate it, by protected groups, the report presented data at a very high level., therefore it was difficult to ascertain the true picture of hate crime based on protected groups.

- **Specific Development Areas**
- **No specific Community Cohesion Strategy or Plan**
- **To develop a range of support mechanisms that can be accessed for residents reporting incidents of hate crime/domestic abuse**
- **Ensure data is disaggregated across the protected groups and types of hate crime**
- **Identify the types of hate crimes being reported, e.g., verbal, physical etc**
- **Ensure that hate crime is closed by reporting on what action is taken against perpetrators**
- **Review current data reported in annual report and suggestion to include more data and information in future Reports**

1.5 Participating in Public Life

Strengths

The council does not appear to have a clear strategy to address this criterion of the framework, the only area that could be evidenced in this area relates to the SHAPE Youth Forum which has now been in operation for 5 years and emerged from the former Youth Parliament in Sandwell. The Forum meets fortnightly.

The SHAPE Youth Forum is an integral part of the Sandwell's child's voice initiative, the SHAPE Programme. It is a valuable tool involving young people in the continuing development of the borough of Sandwell. Members provide a voice for young people across Sandwell and have been consistently used as a consultative body for various initiatives concerning young people.

The evidence found two areas where young people across the borough are actively involved in participating in public life:

- Two Youth Police Crime Commissioners elected in Sandwell will be part of the forum and will join the West Midlands Police and Crime Commissioner's Youth Commission to look at community safety issues including Child Sexual Exploitation (CSE), radicalisation and prevent.
- Two Members of Youth Parliament and Two Deputy Members of Youth Parliament will be elected and become part of the forum and will join British Youth Council representing Sandwell.

Areas of Development

The council needs to develop a policy approach to address this area and could work with partners to increase the take up from under-represented groups to become school governors, be part of the local democracy (councillors), become board members of voluntary and public sector organisations, become magistrates, etc.

Specific Development Areas

- Explore ways of supporting political groups to undertake outreach to increase diversity of candidates and to increase the involvement of under-representative groups
- Contact Operation Black Vote and work with them to engage and outreach with the local black community
- Link up with the local magistrates' courts about promoting and raising awareness about the role of a magistrate
- Contact the NHS about how local people become Non-Executive Directors etc
- Host events in conjunction to raise awareness and encourage new people to partake in the 'decision-making' processes.



Section Two – Leadership, Partnership and Organisational Commitment

2.1 Political and Officer Leadership

The council is committed to fairness and equality, and this is driven from the top by the Leader, Cllr Kerrie Carmichael, who holds the **Cabinet Portfolio for EDI**. She also sits on the WMCA Community Cohesion Group and WM Race Equality Task Force. Her support and commitment for this agenda is further demonstrated by the recent announcement of the **4 EDI Pledges** that she will be accountable for. These are:

- Engage with local communities including the faith sector through local conversations with the voluntary sector and carry out a gap analysis in each town to identify EDI needs
- Ensure inclusivity at all events held by the Council and partners.
- Deliver a work plan to strengthen the diversity of our workforce ensuring a whole council approach.
- Invest in language courses for residents and look for a more personable use of language line.

The Leader's commitment to fairness and equality has set a standard for all council members and staff to follow. Through her active involvement in community cohesion and race equality initiatives, she has demonstrated these values are actionable principles to encourage a culture of inclusivity, diversity and accountability within the council and the wider community.

The Council operates the '**Strong Leader**' model of Executive decision-making. Under this model, responsibility for executive functions rests with the Leader of the Council, who can determine how these will be discharged, including by whom. The Quick Guide to Executive Decision-Making sets out the process for Full Cabinet Meetings.

This is further supported by the recent launch of the Council's **Values and Behaviours**, with five new values and behaviours. For the first time the council has identified a specific value and behaviour that includes a focus on inclusion, which is:

'We are inclusive' - treating each other with respect and knowing our diversity is strength' (including a subset of values and behaviours for managers). The other values and behaviours are:

- We are one team
- We are customer focused
- We are ambitious
- We are accountable

To support the introduction of the new values and behaviours, a series of **One Team Values and Behaviours Launch** and Share sessions for managers have taken place across the council to promote the Council's new values and behaviours.

The Chief Executive joined these events.

In addition to the above event, the 19th July 2023 was set aside for all staff to attend, (where possible), an **'All Staff Briefing Session'**. This event was an opportunity for all staff to be in one place at the same time and also to see the inside of the new aquatic swimming facility before it is officially open. This

event took the form of a **Market Place** style event and all Directorate/Services were represented on the day. The EDI team's work was display on that day.

The Director of Law and Governance is the Lead Director in the council for the EDI agenda and he has **responsibilities and authorisation to undertake all necessary action in connection with the effective administration/delivery of the Council's EDI agenda**. He is supported in this role by the newly established EDI team, which sits within his Directorate.

EDI has become a central element of the **Council's Corporate Plan 2021 – 2025** and is embedded in everything the council does including its partnership working. **'We aim to ensure that everyone enjoys access to good quality services and residents can contribute and participate in boroughwide activities and events'**

The council established the first Equality Commission (EC), which was chaired by Cllr Richard Jones, with a three-year term from 2020 – 2023. Cabinet approved on 21st June 2023, that the EC would continue with a revised name, **EDI Commission** and a new **Terms of Reference**.

It is envisaged that the launch and first meeting will take place during the Autumn period. The Council Leader will take responsibility for Chairing this important Commission. Membership of the EDI Commission will be cross-party, Chairs of the Staff Networks, the Director for Law and Governance, members from the HR, OD and the EDI teams.

From the evidence provided this currently appears to be the only structure for EDI within the council, which is limited in its governance, based on this current model the Directorate's have no direct involvement with this current approach, it is very much politically led.

21st September 2021, the original EC Commission recommended the establishment of a new EDI Team as the council had not had an EDI team for a number of years, this new team is now in place.

A number of initiatives have already taken place during the past 9 months to support the council on its EDI journey, some of these are:

- Updated EDI Policy and Equality Objective was agreed at the November 2022 Cabinet.
- Equality Objective **"We will progress and drive our equality performance through the Equality Framework for Local Government and utilise Council resources to support our equalities agenda. We will embed our 'One Council One Team' approach and commitment to equality by the production and publication of the Council's first Equality, Diversity and Inclusion Strategy, developed through engaging and collaborating with our diverse residents, communities and workforce"**
- An **EDI Position Paper and Gap Analysis Briefing Paper** was produced (5th November 2022), which has resulted in the development of a comprehensive **EDI Roadmap Action Plan**, with a range of actions to be implemented during the next 12 months. The Roadmap action plan aligns with the four themes of the Equality Framework for Local Government E FLG.
- The development of the **Inclusive Calendar** provides an opportunity for key council teams (Communications, Events and EDI Teams) to work closely with community groups and organisations and staff networks to celebrate a range of diverse events throughout the year
- The council has recently re-launched the **Staff Networks** and has appointed 13 Co-chairs across the 6 staff networks (2 co-chairs per staff network with the Ethnic Minority Group having 3 Co-chairs).
- The next implementation phase for the staff networks are the "Staff Networks: Meet and Greet the Leader and Cabinet. This meeting will provide a unique opportunity for the staff network Co-Chairs to engage directly with the Leader of the Council and Cabinet Members. The meeting will create a platform where **Staff Network Co-Chairs**, can introduce themselves, share their invaluable insights,

engage directly with the top leadership team, hear their perspectives and experiences and how they can play a pivotal role in shaping the organisation's EDI direction.

- The Council has a robust **Committee and Scrutiny structure** where EDI is a key part of the decision-making process. All cabinet/committee reports are required to have completed an EIA before being presented at Committee/Cabinet. The council's cabinet report template has a specific impact section, where the EDI Manager provides assurances that the EDI information contained in the report identifies the key impacts and mitigating actions to aid cabinet with their decision making. The council also has a number of scrutiny committees, which are part of the council's democratic process. More details about EIAs' and Scrutiny Committee's will be found in below under **Using Equality Impact Assessments**.
- Other ways that the Leadership shows commitment is through various communications and events, these include:
 - EDI Bulletin
 - Monthly Team Talks (incorporates an EDI page)
 - EDI Drop In clinics
 - EDI webinars
- The Council attended over 60 community events representing the protected groups, e.g. Sandwell Against Racism, Pride in the Park, World Mental Health Day, Sandwell Visually Impaired Forum, Holocaust Memorial Day, Prostate Cancer Awareness Walk, Youth Football Cup Final

It would be good to understand the impact of the range of events and visits that are undertaken by council officials and how these are contributing to the overall EDI agenda.

Good example

For the first time the council has identified a specific value and behaviour that includes a focus on inclusion, which is:

'We are inclusive' - treating each other with respect and knowing our diversity is strength'

The EDI Commission has been established to help promote and embed equality, diversity, and inclusion throughout the operations and activities of Sandwell Council. The Commission serves to help ensure that the council complies with its duties under the Equality Act 2010 and that all residents of Sandwell are treated equitably.

Some of EDI Commission strategic objectives include, to help promote, embed and protect the rights of Sandwell residents to fairness, dignity and respect along with encouraging community cohesion across the Borough. To challenge ignorance and intolerances in relation to all the protected characteristics by being a leading voice that promotes and celebrates the multi-cultural heritage of the Borough and the diverse nature of the local population. To understand, involve and enable our diverse communities to play an active role in civic society and put the citizens' voice at the heart of decision-making.

To review and recommend changes (as necessary) to Council policies, procedures, and practices to ensure the authority complies with its legal obligations, fosters best practice and its workforce reflects the diversity of the people and communities it serves, etc

Areas of Development

The current EDI Commission model appears to be the only EDI governance across the council which in itself is very limited. It is a very political model and does not have any direct involvement for the accountability, involvement of senior leaders and directorates to support this transformational agenda for EDI.

Therefore, the council needs to incorporate an operational model structure that can feed into the EDI Commission but focuses on the operational elements of the council.

Establishment of a Senior Leaders Group (Steering Group) is needed, and then separate EDI groups at Directorate level, they can then report through a formal governance structure.

It ensures that all directorates take responsibility and accountability for this agenda at the Operational level with the Steering Group taking overall responsibility for the strategic overview. This structure can be found across most public sector bodies. It provides a robust mechanism to ensure that the council is embedding EDI internally and externally at all levels and compliance has been met.

The council has one Equality Objective, which is not SMART, suggestions would be to have at least 3-4 SMART objectives. Failure to not have a SMART objective (s) means that the council is not compliant with the PSED.

The council currently has no EDI Strategy in place which will enable them to have a clear sense of direction, at the moment there are lots of initiatives and work been done which is commendable but without a clear direction, which may result in resources and time been wasted on things that are not important at this moment and the more important things are not been undertaken. The only current document is the most recently refreshed EDI Policy. The council needs to be put in place the building blocks for EDI to ensure successful outcomes, ad hoc events, engagement activities, reports etc will not embed this agenda successfully and achieve the outcomes required.



EDI is clearly a strong commitment from the leader, but this is not as clearly demonstrated across the other senior leaders of the organisation and EDI appears to be an afterthought based on the ad hoc approach to EIA's and EDI data collecting, monitoring and reporting.

More visibility from leaders – including enlisting the support of officers and senior leaders to the role as EDI champions so that they take more of an active role in promoting and championing this agenda.

Specific Actions

- The council needs to put in place the building blocks for EDI with a clear sense of purpose and direction
- Establish a more robust EDI Operational governance structure with an Officer led Steering group, supported by Directorate's EDI Groups
- Consideration of how the Overview and Scrutiny committee can be more actively involved in the EDI agenda
- More visible EDI leadership and role models from senior leadership
- Identify EDI champion Directors to lead and champion
- Need to agree and set a number of Equality Objectives that are SMART
- Develop an EDI strategy.
- Any delays in future compliance should be met with a Holding Statement on the council's website explaining the reason for non-compliance. This will reduce initial sanctions and regulators

2.2 Priorities and Partnership

The Council has a Corporate plan and an Equality Objective, which are the drivers to currently being used to address inequalities and disparities across the borough. It is envisaged that the council will be developing a new EDI Strategy with a range of new SMART objectives, which will help to drive this agenda more robustly.

Some partnership work that is supporting the council's priorities are:

the Sandwell is a Borough of Sanctuary which is a network of groups, and individuals who have pledged to build a culture of welcome across the borough as part of the national City of Sanctuary Network. A strategy is being developed outlining how the partners can work towards greater inclusion and equality for refugees and asylum seekers whilst raising public awareness.

The council is taking its Corporate Parenting role seriously, by ensuring that their education, their health and welfare, what they do in their leisure time and holidays, how they celebrate their culture and how they receive praise and encouragement for their achievements is being met by working with partners to make this happen. The council aims to ensure that everyone working for the council takes responsibility for the care of children and young people and that as corporate parents, we need to have the same concerns for them as we do for our own children.

A key element of partnership working is through Co-production. The council has recently agreed principles and agreement to co-production. The council's aim is that we can use the principles across our system to ensure Sandwell residents are able to experience a consistent offer of working in a co-productive way and adopt the principles to support best practice. Changing Our Lives will be supporting this agenda and a series of co-production sessions delivered from September 2023 – April 2024.

The Tenant and Leaseholder Scrutiny Group links into the Safer Neighbourhoods and Active Communities Scrutiny Board. They work in partnership with the Housing Teams. The panel is made up of a diverse membership of tenants and leaseholders from across the tenant population. The purpose of the panel is to: strategically work with senior managers and directors to scrutinise housing services and make recommendations on improvements to ensure value for money and provide a collective voice for tenants. This panel meets on a monthly basis for approx. 12 – 15 hours per month, this is an unpaid role. There is also a Tenant **Auditors Group** with 9 members who audit areas of the housing service they think are important to tenants, producing reports and recommendations based on their findings.

Sandwell Joint Carers Strategy – 2022 – 2026 has been developed collaboratively with a range of partners across the borough, including voluntary and community sector. To support the implementation of the strategy there are 9 promises for carers in Sandwell, with a supporting action plan

- **Promise Number 6 states: - Awareness and Diversity, with the key outcome to ensure that all partners work to raise the profile of caring and ensure under-represented carers' voices are heard and supported, the promise will capture demographic data by protected groups.**

Other examples of Partnerships that support the delivery of the Council's priorities are the Safer Sandwell Partnership (SSP), Sandwell Safeguarding Adults Board, Children, Safeguarding Partnership and Sandwell Health and Wellbeing Board.

A number of key pieces of work are taking place with the Sandwell Community and Voluntary Sector (SCVO) organisation, which supports and represents the voluntary, community and social enterprise organisations in Sandwell. The council has a Compact Agreement with the SCVO, which sets out their working relationship.

Grant funding plays an important role in enabling local voluntary and community organisations to support local initiatives that help local people. Very often a (small) grant can provide a huge return for the community, whether by funding events which bring people together, supporting services which meet people at their greatest need, or by enabling groups to buy equipment or resources which build their capacity in a very practical way.

From time-to-time SCVO is asked to administer local grants on behalf of local, regional or national funders, e.g., Examples of these in recent years include Grassroots Grants, Community Champions funding, the Active at 60 programme and the Migration Impact Fund. SCVO publicise grant opportunities widely, targeting particular types of organisations, if necessary, supports organisations to submit clear applications and convene local grants panels to assess requests for funding.

Examples:

- SCVO Vision 230 LGBT+ Health Challenge Fund grant programmes
- Public Health Anticipatory Care is proactive healthcare and support, targeted at people of all ages living with frailty, multiple long-term conditions and/or complex needs to help them stay independent and healthy for as long as possible at home, in the place they call home or in their local community.

Another example is The Sandwell Health Inequalities Programme (SHIP), which is a three-year grant funded programme developed with local community organisations. It will deliver health improvement for local residents through a varied programme of activities in 11 community centres across Sandwell. Projects include:

- To tackle childhood and adult obesity
- Zumba classes,
- Maternity and women’s health groups
- Exercise groups for over 50s,
- Postural gentle exercise for older residents,
- A community swimming group
- Football sessions for adults and young people.

There are also multiple activities aimed at preventing and managing diabetes, cancer, and other long-term conditions. These are complemented by wellbeing activities, social groups and coffee mornings in local community settings, which bring people together, to reduce isolation and improve mental health. These projects are being delivered across community organisations that represent the protected groups.

Sandwell Language Network, supporting those who do not have English as a first language or little English to gain a qualification in English speaking, and improve their options for work and support

Development of a new Inclusion Eco-system for children and young people. In June 2023, Sandwell Metropolitan Borough Council, together with the SEND Local Area Partnership, launched eight workstream groups for co-designing and co-delivering a new Inclusion eco-system for children and young people with SEND, those who attend alternative provision, and those who are vulnerable and/or at risk of not thriving in Sandwell. This innovative approach to system-wide transformation will enable the Sandwell SEND Local Area Partnership to co-construct a new SEND eco-system for children and young people within Sandwell and improve their experiences and outcomes.

Good Example

Family Hubs and Start For Life programme

The Council has been awarded up to £4.3million through the Government’s family hub and start for life programme. The Council will receive this funding over a three-year period and it is intended to enhance family hub provision across Sandwell, rather than to develop a single site, building on our seven existing children’s centres but actively exploring a hub and spoke arrangement, with ‘spokes’ at other locations across the Borough.

The hubs will integrate other services that can also include domestic abuse, housing needs, and welfare rights. The plans are considering how we include residents from under-represented and marginalised groups. The Children and Education Teams are leading on this initiative the funding will cover the 4 following themes:

- 1. Infant feeding
- 2. Parenting – parenting programs/support
- 3. Homeland environment - how parents can help their children to read, recognise words, speak/talk.
- 4. Perinatal mental health - parenting relationships that bond between parent and baby from conception to birth, also their emotional and mental well-being after they’ve given birth to the baby.

To assist this programme, a population health needs assessment is developed which incorporates, identifying inequalities in the population and specific at-risk groups. e.g., by age, ethnicity profile, geographical location and deprivation levels.

The Sandwell Health Inequalities Programme (SHIP) is a three-year grant-funded programme developed with local community organisations. It will deliver health improvement for local residents through a varied programme of activities in 11 community centres across Sandwell.



Areas of Development

Based on the evidence the Council works well in partnership with public, voluntary and community sectors. However, we are not able to ascertain through the contract/grant funding what level of monitoring is taking place across the different protected groups.

From the evidence collected, I'm not fully clear about how the grant/funding regime is fairly distributed across the community and voluntary sectors organisation and particularly those from particular protected groups. Also, how and who is deciding on the funding/grant priorities?

Greater transparency about ensuring that all voluntary and community sector protected groups are given a fair and equal opportunity to access grants/funding opportunities and that we do not always go to the 'usual suspects' when allocated funds/grants.

As we have no direct EDI Objectives it is through default that the council is delivering an EDI agenda rather than design and the majority of the projects, initiatives and programmes are being driven by the Council's priorities which may not necessarily always consider the wider EDI implications in the delivery and implementation.

With the development of EDI objectives, it will be imperative that these are then incorporated into service/ plans, each staff member to have at least one EDI objective. This approach will contribute to the overall delivery/achievement/success of the EDI objectives and support the council in embedding EDI across the council.

Specific Actions

- Need to ensure that EDI Objectives are incorporated into the delivery of the council's priorities
- Ensure that EDI monitoring is undertaken for all grants/funds awarded to the community and voluntary sector – including ensuring a fair and equitable process for how grants/awards are allocated.
- Use grant awards as leverage to become an effective enabler. Use this funding to improve participation and build community capacity, especially for the more marginalised groups, e.g., ethnic minority groups
- Integration of EDI objectives into service/team plans and setting individual EDI objectives for all staff so they are supporting the delivery of the EDI objectives (include as part of the appraisal process)

2.3 Using Equality Impact Assessments

Strengths

From the evidence gathered, the Council has a dedicated page on its intranet site, which houses a range of documents and resources relating to Equality Impact Assessments (EIA). These include:

- Public Sector Duty and EIA
- EIA Help sheet
- EIA Matrix
- EIA Screening and Flowchart
- EIA Template Guidance
- EIA Template
- LGA Consultation Checklist
- Government Consultation Principles
- LGA Gunning Principles

The Council has a robust committee and scrutiny structure where EDI is a key part of the decision-making process. All cabinet/committee reports are required to have completed an EIA before being presented at Cabinet/Committee. The council's cabinet/committee report template has a specific Impact section, where the EDI Manager provides assurances that the EDI information contained in the report identifies the key impacts and mitigating actions to aid the cabinet/committee with their decision-making.

The current template needs to be refreshed to incorporate any additional disadvantage or vulnerable groups that the council has identified, e.g., Corporate Parenting. The EDI team has a tracker that records all EIAs that they have quality-assured, in advance of papers being submitted to cabinet/committees.

Based on the EIAs review for this exercise the majority showed no impacts based on the protected groups and on the few occasions where an impact was identified there were limited mitigating actions and no actions recorded in the action plan template.

Very few of the EIAs reviewed provided statistical data to support their decisions on impacts. The EIAs text was repeated for each protected group regardless, which demonstrates very little regard has been taken when completing EIAs. Therefore, not sure how these actions are monitored to avoid adverse impact or discrimination and how they are getting through the committee/cabinet process without any challenge.



Good Examples

- A range of EIA resources that is accessible and available to those managers completing an EIA is positive.
- Specific Section contained in the Cabinet/ Committee Report Template for Equality Impact
- The assurances that an EIA is completed is part of the cabinet/committee decision-making process (flowchart indicates where EIA's should be completed).

Areas of Development

From the evidence, the EIA process is seen a tick-box exercise to ensure that reports are presented at Cabinet/Committees and not seen as a key form of the Leadership's decision-making process. The timeframe provided for the EDI team to provide assurances is very short, which puts undue pressure on the team, when currently only the EDI Manager is trained to provide this level of assurance.

All leaders need to be more aware of the requirements of EIA's and the importance of ensuring that they are completed at the start of the process rather than at the end to ensure that it goes through the cabinet or committee cycle. There needs to be greater responsibility and scrutiny of EIA's before sign off. This could also include a clear governance process for EIAs that will guarantee the right checks and balances are in place before any report is signed off. A regular schedule for EIA training for managers, a suggestion is that it becomes mandated that any manager required to complete EIA's must attend the training, this already applies for recruitment and selection.

The EDI team needs EDI training to support the EDI Manager, and to enable them to undertake the initial quality assurance feedback phase, (which involves reviewing the submitted EIA and providing feedback to the manager, before providing the EDI Manager with the final assurances and narrative that can be included in the cabinet/committee reports). This needs to include a governance framework for the sign off of EIAs before they are going through the cabinet/committee cycle.

A regular schedule for EIA training for managers, a suggestion is that it becomes mandated that any manager required to complete EIA's must attend the training, this already applies for recruitment and selection.

A concern in relation to EIAs is that no actions appear to be taking place with any mitigating actions, this could potentially have a negative impact on the council as should a challenge be made about any EIA that has mitigating actions there does not appear to be any action plans or monitoring of the actions.

The EDI Team tracker needs to be updated to capture additional information for compliance. Examples of a robust EIA could be uploaded for managers

Ensure annually the EIAs that have been signed off are published (a full copy or a list of completed EIAs) on the council's website and incorporated in the Annual EDI report.

Specific Actions

- Review the EIA template and process, currently, EIAs do not take into consideration all the other disadvantaged and vulnerable groups
- Create a robust EIA governance process (with clear timelines for completion, accountability for mitigating action etc). Update the EIA tracker to reflect new template and governance processes
- Design and deliver EIA training programme for the EDI team for EDI team
- Design, deliver and promote regular EIA training for managers (make it mandatory) standard training requirement if you have responsibility for report writing
- Ensure EIAs are published on website and included in annual EDI report



2.4 Performance Monitoring and Scrutiny

Performance Monitoring - Strengths

Over a number of years Sandwell has developed a range of approaches and techniques to provide assurance that PIs are being correctly collected, calculated and reported, and that the calculation can be evidenced for inspection purposes. Processes include identification of 'high risk' indicators and internal audit of the PI calculation and data source, broadening over recent years to focus on quality assurance checks relating to the underlying IT systems - with 'deep-dive' into associated data recording and data inputting processes. The processes and procedures have been continuously honed and fine-tuned to provide a useful Data Quality Toolkit, to which Sandwell is constantly adding.

Council approved a corporate Performance Management Framework (PMF) on 12th April 2022, to address the recommendations from the Governance Value for Money Review by Grant Thornton and as a key element of the Council's Improvement Plan.

The corporate PMF includes measures under all strategic objectives in the Corporate Plan to monitor progress in these key areas. The PMF also includes elements that measure the Council's use of its resources to ensure the delivery of the strategic objectives. The Strategic Risk Register details the key strategic risks that need to be managed to ensure that they do not negatively impact the successful delivery of the Corporate Plan objectives

The majority of Organisational Health Indicators (20) are reported annually, sickness absence is reported on a quarterly basis along with a set of 6-monthly indicators. In relation to employee engagement. The Q1 performance report included details of the Employee Engagement Survey that was completed in April 2022. Actions to respond to the survey have been embedded in the Improvement Plan and Directorate-level action plans which are being monitored on a quarterly basis.

KPI's are discussed at Leadership Team and each Directorate has a range of KPIs; some that are statutory, and others are local. **We will'** statement has been incorporated into the Corporate Plan refresh that went to Cabinet in June 2023.

The specific KPI that relates to EDI is based on the Equality Objective:

- We will progress and drive our equality performance through the Equality Framework for Local Government and utilise Council resources to support our equalities agenda)

Under Measures

- Completion of the Audit and Assessment against the Equality Framework for Local Government (completed by June/July). Following this audit further performance measures will be put in place

The other area when the council is monitoring EDI KPIs is the **Organisational Health Indicators**, 7 indicators have been identified with a focus on protected characteristics (these are linked to the annual EDI workforce and gender pay gap reports). During the period 2022/23 of the 7 indicators 4 were going in the right direction (green) and the remaining 3 were decreasing.

Improving (Green)

- Increase in the percentage of top 5% of earners from black and minority ethnic communities (21.5% in 2021/22 to 23.6% in 2022/23)
- Increase in the percentage of Ethnic Minority employees (24.6% in 2021/22 to 25.1% in 2022/23)
- Decrease in Gender Pay Gap Median (10.4% in 2021/22 to 3.3% in 2022/23)
- Decrease in Gender Pay Gap Mean (3.4% in 2021/22 to 0.6% in 2022/23)

Not Improving (Red)

- Decrease in percentage of top 5% earners that are women (54.8% in 2021/22 to 53.2% in 2022/23)
- Decrease in percentage of top 5% of earners who have a disability 2.2% in 2021/22 to 1.9% in 2022/23)
- Decrease in disabled employees (4.7% in 2021/22 to 4.3% in 2022/23)

Good Examples

- Robust Performance Management Framework that sets out clearly the council's approach to performance management
- Set of Corporate and Organisational Health Indicators, which include some EDI specific KPI's



Areas of Development

There is only one EDI KPI in the Corporate Plan and that is based on the one EDI Objective, concerns have already been raised that the KPI is not a SMART objective/KPI. It would be good to see Directorates incorporating EDI into their KPIs. In relation to the PMF, it would be good to see this refreshed to support Directorates to be able to incorporate and develop EDI KPIs. This would see an increase in the number of EDI related KPIs rather than just specific EDI ones.

The 2023/24 Organisational Health Indicators have not set any targets for their 7 specific EDI KPIs, also there are no action plans to address the targets that were not met, which again is concerning.

The KPIs that are currently identified are from the two workforce reports (the Annual Workforce and Gender Pay workforce reports), as both of these reports are limited in data it is therefore not surprising that the only KPIs that we report are so limited.

Suggestion that KPIs should be based on areas that the council needs to improve.

Specific Actions

- Only one EDI KPI in the Corporate plan and no other specific EDI KPI's across the corporate plan. Develop a range of EDI metrics and supporting KPIs to be incorporated into the Council's performance management framework at corporate and service level
- Create an EDI dashboard at corporate/directorate and service level (commence with HR Dashboard)
- Consistent approach to data collection, monitoring and storage across the Council – systems that capture similar data – benchmark against the census 2021 categories
- The Organisational Health Indicators have no targets set for 2023/24
- On-going action plans need to be developed to support under-performing actions
- Work with the PMF team to incorporate EDI into PMF

Scrutiny - Strengths

Scrutiny Boards fulfil the statutory responsibility placed on local authorities to review and scrutinise their decision-making – it allows for cross-party engagement and provides an opportunity for councillors and members of the public to improve the quality and delivery of services as well as strengthening the decision-making process. Scrutiny, also known as overview and scrutiny, is a vital part of the councillor decision-making process and ensures its decisions and policies are right for local people. Each year the Council appoints members to a Scrutiny Management Board and four thematic Scrutiny Boards. Each Board has its own area of responsibility which is themed around the Council directorates and aligned to deliver the Sandwell Vision 2030 ambitions and the Council's Corporate Plan.

Scrutiny Committee will often undertake, Scrutiny Reviews, One-Off Items and Pre-Decision Scrutiny There are five scrutiny boards:

- Budget and Corporate Scrutiny Management Board
- Children's Services and Education Scrutiny Board
- Economy, Skills, Transport and Environment Scrutiny Board
- Health and Adult Social Care Scrutiny Board
- Safer Neighbourhoods and Active Communities Scrutiny Board

Examples of the role of scrutiny

- At its meeting on 2nd August 2021 the Children's Services and Education Scrutiny Board had agreed to undertake a review into Special Educational Needs and Disabilities (SEND) Transport Models. A scoping document was agreed and a cross-party Working Group, which included members of the Budget and Corporate Scrutiny Management Board was established to carry out this review.
- In September 2021, it was resolved that the Director of Law and Governance arrange 16 scrutiny recommendations to be submitted to Cabinet for consideration and that post-18 Provision for young people with Special Educational Needs and Disabilities be included in the work programme for the Children's Services and Education and Scrutiny Board.

The Impact

SEND Transport Performance Update was presented to the Budget and Corporate Scrutiny Management Board on 29th March 2023. Key points to note from the report:

- A reduced travel time from an hour to 50 minutes or less was introduced within the Framework, which was prompted by the recommendation from Children's Services and Education Strategy Scrutiny Board on the basis of improving the outcomes for children and young people and led to an increase in the number of routes / vehicles required.
- In developing the new framework officers also took into account recommendations from the Council's own internal review, and the Children's Services and Education Scrutiny Board supported the safeguarding of all children and young people and their journey experience, which included: reducing travel time for all passengers to 50 minutes: all drivers and passenger assistants to have undertaken basic first aid training; promoting awareness of travel training; and the continued application of the TAS Badging process for drivers and passenger assistants employed on council contracts.

Good Example

The refreshed Equality Policy 2022 was called through the pre-decision scrutiny, rather than through the other routes of scrutiny.

Areas of Development

The evidence gathered that the council has in place good systems for scrutiny and the examples we found demonstrated that EDI issues are considered but couldn't find a consistency of EDI considerations going through to scrutiny and how they challenge the lack of EDI implications in reports and the robustness of EIA's

From the evidence, we were unable to ascertain how scrutiny addresses EDI via their roles and responsibilities - based on Annual report 2019 – 2021 there is limited evidence of the scrutiny's role in relation to EDI.

Specific Actions

- Scrutiny to be trained to look at inclusion through that lens
- Ensure that Cabinet and Committee members attend EDI and EIA training
- Develop a list of reports that should be taken through the scrutiny route that have EDI implications based on impacts from EIA

Section Three - Responsive Services and Customer Services

3.1 Commissioning and Procuring Services Strengths

Public authorities spend £236 billion each year on buying goods, works or services from other organisations across every sector. This purchasing power can be used by public authorities as a way to advance equality and, where appropriate, achieve wider social benefits, such as creating training or employment opportunities.

The Equality Act 2010 (the Act) sets out anti-discrimination laws and the requirements of the public sector equality duty (PSED). Compliance with the PSED should help public authorities ensure that the goods, services and works they procure are fit for purpose – thus ensuring they meet the needs of their users. As such it should also be seen as an effective tool for improving economy, efficiency and effectiveness and therefore value for money.

The Council is currently developing a **draft Procurement Strategy** that is based on the LGA guidance. The previous strategy dates back to 2010. The current draft procurement strategy does not appear to have any specific EDI reference and the council does not use the CCS SSQ (standard selection questionnaire).

It is rather concerning that we are unable to demonstrate how fair and equitable the council's current commissioning and procurement services are, when we cannot find any process to demonstrate EDI throughout the commissioning and procurement cycle.

The Council does have a **Social Value Guidance**, which follows the Social Value Act 2012. Within the guidance three main areas will need to be considered, Economic, Environmental and Social Under Social Value Equality, Social Inclusion, Fair and Ethical Trade and Apprenticeships are part of the criteria in ensuring that the contract complies with social value requirements. No examples of how this applies were presented for the audit.



Good Example

The council has demonstrated a good understanding of the use of Social Value in contracts above the OJEU threshold and also smaller threshold contracts. The three areas to be considered when assessing social value is Economic, Environmental and Social.

Under the Social area theme, managers are required to demonstrate, Equality, Social Inclusion, Fair and Ethical Trade and Apprenticeships as part of its criteria.

The Council's Social Value Team are equipped to support the council contracts to ensure that a Social Value Delivery Plan (SVDP) is placed with the tender or contractual agreements. Once contracts are awarded there is an agreement to meet certain KPI's and monitored as outcomes. Within the SVDP there are three main areas of social value, Social, Economic and Environmental.

Social Themes: Employment and Skills - capturing meaningful paid work experience opportunities; jobs; apprenticeships; T. Levels etc.

Schools and Community Engagement – identifying local schools near developments (adopt a school initiative) helping to match make long term contractors to develop relationships with nearby schools.

Economic Theme – working within the Sandwell Business Growth team, social value is recognised in supporting Micro and SME's, helping to support the local economy with encouraging larger businesses to work closely with local suppliers within a 10 – 20 mile radius, become more transparent and opening up opportunities with meet the buyer events.

Environmental Theme – encouraging to reduce, reuse and recycle; carbon footprint, land fill. Engage with greater sustainability initiatives such as local sustainability innovations that help decarbonize.

The end of year report for social value 2022, showcased the following social outcomes:

- 13 meaningful paid work placements
- 73 jobs created
- 76 new Start Apprenticeships/paid trainees
- 15 graduates
- 105 hours of school engagement
- 168 hours of community programme activities

The beginning of 2023 has been successful in already celebrating two young vulnerable people with disabilities into work within our own Council Neighbourhoods team, and 'women into construction, are on the up with young women going into plastering, painting and decorating and Quantity surveying.

Working closely with the Think Sandwell Specialist team who look at supporting people with disabilities into work and the Think Sandwell Employment & Skills team – to support local people from low income families, care leavers, vulnerable groups and disadvantaged groups.

The demographic data is usually captured with consent from the candidates, however this is not mandatory. It is more mandatory when funding is involved e.g. ESF, IMPACT as it is to capture data and measure the equality and diversity such as age groups and ethnicity. Therefore, collected data on protected characteristics across employment and skills is captured through the customer management system called YETI. There has been some analysis of this data but it has not yet been used to inform any service or delivery changes.

This is an area to strengthen across the social value outcome measurement going forward.

Areas of Development

While certain concerns may exist about the lack of EDI in the procurement and commissioning process with the latest strategy dating back to 2010. Work with the EDI team to incorporate EDI into the draft Procurement Strategy before it is finalised, would be a great start.

In practice since Sandwell Council adopted its original Inclusive Economy Deal in 2020, which developed into its Inclusive Recovery Action Plan for businesses in 2022 procurement has become significantly more inclusive in its approach. More benefits have been given to support local groups who may have traditionally faced marginalisation or barriers to work or training, and more effort has gone into levelling the playing field for local subcontractors to participate more and more in opportunities to receive work contracts.

While the foundation is positive there is always space to work further with the EDI team to incorporate EDI into the draft Procurement Strategy before it is finalised, and take into account in more detail the social, environmental and community benefits being generated via Social Value commitments within core contracts.

Within the Audit there has now been additional evidence being provided of how Social Value is built into contracts and what positive outcomes have been achieved by adhering to Social Value Guidance.

Suggestion that the Procurement Team look at further best practices from other local authorities and NHS organisations, also the Equality and Human Rights Commission (EHRC) has a best practice document that the council can adopt to ensure that it is compliant with the PSED, operating best practice and providing fair and equitable opportunities throughout the procurement cycle.

Specific Areas

- No EDI reference in draft Procurement Strategy however in practice over time there is increased EDI becoming embedded in elements of council contracts – EDI team to work with the Procurement Team and Social Value Team to ensure that EDI is embedded,
- Review the council's approach to procurement to maximise impact on the EDI agenda
- Build in mechanisms to embed Equality standards throughout the procurement and social value cycle
- Evidence how the council can demonstrate that commissioned/procured services are being achieved, via its EDI priorities.
- Built in monitoring through the procurement process.
- The EDI team to work with all officers/managers involved in the procurement/commissioning/Social Value process.
- EIAs should be built throughout the Procurement/commissioning cycle

3.2 Integration of Equality Objectives into service planning

Strengths

Based on current evidence collected, the council has one Equality Objective which was approved back in November 2020, this is included in the council's Corporate PMF and is a key KPI.

The Housing Management Team highlighted that even without any specific Corporate EDI objectives, they have been developing work which incorporates EDI. Examples of how they have undertaken this includes: developing policies, strategies and workforce planning which would involve an equality impact assessment before implementation.

Other key pieces of work in their Directorate Business Plan is the introduction of a Borough of Sanctuary which will positively promote equality in the Borough. They have also done work on personal evacuation plans (PEPS) as part of our work on building safety and compliance, which is driven by understanding the diverse needs of the council tenants and ensuring reasonable adjustments are made to address vulnerabilities.

They have also developed a **Reasonable Adjustment Policy** which came as learning from a complaint about an ASB investigation and as a recommendation from the Ombudsman.

We did not find any other examples of how EDI objectives or EDI is built into Directorate Business / Service Plans. It is understandable that there is limited EDI reference in plans with the absence of any meaningful EDI objectives it is understandable why there is a lack of consistency across the Directorates, when it comes to this area of the framework.

Good Example

The Comms team has developed an internal and external Communications Strategy that links into the Business Plan, and key strategies affecting Black, Asian and Minority Ethnic issues.

Public Health record service user ethnicity and have increased support in Healthy Sandwell to meet the language needs of the borough, increasing those who speak local languages to 3 in the team. Commissioning also takes service users need into account, the alcohol service has a high proportion of users from Minority groups and therefore more targeted marketing has occurred to ensure increase in uptake of services.

During COVID the Public Health team receive the National Public health team award due to the work with the community and faith sector, providing culture specific presentations and dispelling misinformation in the community such as non halal vaccines.

Areas of Development

Overall, the Council needs to be embedding EDI in the Service Planning process, however in the absence of EDI objectives, the Council may wish to encourage Directorates to look at where they can identify any EDI work and then included that into their service plans as an interim measure until the council has written its EDI Strategy.

Specific Actions

- As an interim measure in the absence of EDI objectives, Directorates need to develop at least one objective that can be incorporated into their service plans to ensure that they are delivering EDI
- Council needs to set as a matter of urgency at least one SMART EDI Objective(s) - failure to do so will mean not complying with the PSED requirements
- The Directorate and Service Plan templates need to incorporate future EDI objectives or guidance of how to set objectives in the interim
- Systems need to be in place to monitor future EDI objectives
- Encourage managers to capture EDI issues as early on in the directorate/service planning process and create good practice template to capture EDI initiatives that can be shared across the council.
- Include EDI related KPIs within the Directorate/Service Planning framework
- Business planning template needs to incorporate EDI objectives



3.3 Service Delivery and Design

Strengths

The council has a One Stop Shop Operating Model, which provides a range of different ways to access council services, this is supported Qmatic which is the virtual queuing system utilised by the One Stop Shop. This can be used by all officers to create appointments at Oldbury Council House for both internal and external officers as well as customers. With regards to Customer Feedback (Complaints and General Enquiries), the council uses 2 separate systems – Firmstep and Open Housing. However, data collection is undertaken regarding the protected characteristics. The council has a range of buildings, but the audit was not able to confirm which buildings are fully accessible as there was no contact from the Estates team. However, from a quick observation, the Oldbury Council house is accessible doors, signage for induction loops, accessible toilets, parking spaces and evac chairs located on the different floors.

Evidence suggested that other service areas who do use the above systems may record some of the protected characteristics i.e., Housing – Application Forms (Open Housing) and Revs & Bens.

The **Community Hubs** pilot that are running for the next 6 months at 2 locations (West Bromwich and Blackheath Library one day per week) Data collection will be taking place which will include age data (18-25, 26-35,36-45,46-55,56-65,over 65). This is basically to see the age range of customers coming to use the local services.

However, in recognition that the council can do better in relation to the customer experience, 4 strategic objectives have been identified to ensure the best possible customer experience journey, The council is at the infancy stage of implementing this approach, and Objective 3 specifically refers to inclusion - **To create inclusive, accessible services that meet the changing needs of our customers.**

The other objectives are:

- Objective 1 - To always put you our customer first by delivering a customer first focused culture within our organisation.
- Objective 2 - To provide excellent customer service regardless of the channel you choose to use to contact us.
- Objective 4 - We will listen, learn and improve our services based on our Customer Feedback

It is envisaged that EDI data collecting, and monitoring will be incorporated into this new approach.

Limited information was found about what **Communication Support** (Translation and Interpretation Services) is available for customers, the only information found was:

- The council has a list of internal staff who can provide communication support. There were about 8 members of staff and the majority of the languages were Asian, there did not appear to be any provision for other community languages, BSL etc. ASC offer access to external interpreters but not sure if this is open to all the council or just ASC.
- **The Sandwell Language Network (SLN)** provides a programme of free, community-based English language learning support across the borough for migrant and our ethnic minority communities. The need to improve health literacy within our ethnic minority communities and the demand for community language learning is increasing. The council is proposing to continue to fund this project for an additional 2 years. General information - the vast majority of the council's policies/

strategies are out of date and don't appear to have a standard statement that offers residents documents in different formats, e.g., accessible format community languages.

- Did not get to speak to colleagues in ASC and therefore not sure where the council is in relation to the **Accessible Information Standards (AIS)**.

The council has developed a **Reasonable Adjustment Policy** for residents/tenants which sets out how we intend to meet the needs of our disabled residents.

The desktop exercise found that the council has in place an **accessible section on its website**, however only part of the website complies with national standards (Web Content Accessibility Guidelines) version 2.1 AA Standard. This needs to be updated to be compliant across all areas. Compliance with national standards aligns to ensuring that the council is supporting communities who are experiencing digital exclusion as it particularly affects, older people, lower-income families, refugees and asylum seekers, disabled communities and those from socio-economic groups. The last strategy ended in 2021.

The Tenant and Leaseholder Scrutiny Group is a formal group that feeds into the Safer Neighbourhoods and Active Communities Scrutiny Board. They work in partnership with the Housing Teams. The panel is made up of a diverse membership of tenants and leaseholders from across the tenant's population. The purpose of the panel is to: strategically work with senior managers and directors to scrutinise housing services and make recommendations on improvements to ensure value for money and provide a collective voice for tenants. This panel meets on a monthly basis for approx. 12 – 15 hours per month, this is an unpaid role.

There is also an Auditors Group with 6-8 members who look at empty properties, any housing repairs, undertake surveys and produce reports to Housing team. There is also a Tenant Auditors group which went live in the summer of 2022. It is currently made up of 9 volunteer tenant members. They independently decide what areas of the housing service to audit. To date they have audited the process for ending a tenancy and Fire Safety in high rise blocks. The audits have included desktop research, interviewing staff and surveying and direct interviews with other tenants. Both reports have led to recommendations for change being agreed by the relevant service areas.

The Council has received national recognition for the work it undertook to encourage and implement the Voter ID programme across Sandwell. **The Elections Team** provided information in different formats, including easy read, audio formats and community languages and actively promoted the programme across the borough. As a result of their good work they have been invited to sit on a national accessibility group to share good practice.

The Elections Team collates a range of data sets to build borough demographics to improve and encourage the take up of residents eligible to vote or, statutory regulation requirement allows the team to have access to any council data to increase voting take up. This includes, a data sharing agreement, information from schools, council tenants, Revs & Bens, care homes, and HMO. Blue badge information. The data can only be kept for 12 months.

The team also actively use a range of data sets to encourage young people to register to vote on reaching their 18th birthday. They send out birthday cards at 18, write and contact young people through schools and use local media and radio stations to encourage take up.

Wellbeing events for various community groups such as Gurdwaras, Temples and churches.

Holiday Activities and Food (HAF) Programme. The Department for Education funded HAF programme is available to school aged children who are eligible for and receive benefits-related free school meals during Easter, Summer and Winter holiday periods. Sandwell has extended this offer to a wider cohort of children and young people who may not meet eligibility criteria but have a “holiday experience gap” which means they are less likely to access organised out of school activities; more likely to experience “unhealthy holidays” in terms of nutrition and physical health and more likely to experience social isolation. Whilst maintaining the integrity of the HAF programme framework standards in meeting the core aims and objectives:

- Healthy meal provision
- Enriching activities
- Physical activities which meet the Physical Activity Guidelines
- Nutritional education
- Signposting and referrals
- Reducing social isolation

Currently children in Sandwell who have an Education Health Care Plan, Looked After in Children in Education and those with No Recourse to Public Funding can access HAF activity during the longer holiday periods, as well as those in receipt of benefit related free school meals.

As part of improving access to services the HAF programme will be delivering a range of workshops and webinars to providers so that they can have a better awareness and understanding of working with communities in terms of Equality Diversity and Inclusion

The sessions will require mandatory attendance by providers and will cover:

Access and duties of providers for provision for children with SEND

Access for children from a diverse range of backgrounds addressing anti-racist language, communication and positionality

Understanding and an awareness of trauma informed practise

Supporting children and young people with additional needs (SEND). The Sandwell SEND Information, Advice and Support Services (SENDIASS) offers a free, confidential and impartial service for all parents and carers of children with special educational needs in Sandwell to help them navigate a way through the new SEND legislation.

The Council recognises that it is vital for parents and carers to be fully involved in discussions about their child. To help with this Sandwell has issued **A Guide for Parents and Carers** which is a full guide to the support available to children with special educational needs and disabilities in schools, including statutory assessment and Education, Health and Care Plans.

The Council also provides a range of holiday clubs and activities for children and young people with additional needs (SEND) via the Holiday and Food (HAF) Programme.

Malthouse Outdoor Activity Centre is a multi-activity centre for children and young people from 8 years old and is well equipped to cater for a range of practical experiences which include: Climbing & Abseiling, Mountain Biking, Canoeing & Kayaking and Archery. Malthouse provides dedicated support specifically for children and young people with SEND from special schools and alternative education provision.

Enhanced Youth Support (EYS) is a targeted offer within the Youth Service. The offer consists of one to ones, hand holding, specialist young women’s provisions and targeted interventions. EYS works with individual young people and creates bespoke support packages to tackle the issues they may be facing. The EYS offer includes Marvel Youth Club, a SEND provision for young people aged 11 to 25 years based at Wednesbury Museum and Art Gallery; together with a range of holiday activities specifically for children and young people with SEND. EYS also delivers holiday activities specifically for young women aged 11 to 19 years.

Good Examples

A team of colleagues came together during the pandemic to support the most vulnerable. Data was drawn from various datasets and the analysis collated an over-arching list of the most vulnerable adults. Adverts were placed to inform communities that this support was available and a dedicated phonenumber was made accessible for residents making calls asking the residents what they needed.

The most vulnerable were provided with basic items, including food etc, however tailored **care packages** were available to meet specific cultural, religious and individual needs. Culturally appropriate food was available and interpreters where English wasn’t the resident’s first language, translated information was also available in different community languages.

The council responded quickly to the cost-of-living crisis by establishing a number of **‘Warm Spaces** that are free, safe and supportive spaces that residents can visit during the colder months. All Sandwell libraries will be identified as a Warm Space and some of our community and leisure centres. The warm spaces provide an opportunity for staff to chat to residents and offer support services and advice and information about benefits, energy support, managing bills, how local charities can help and how to access community support to combat isolation

The **Bereavement Services** highlighted that they had no formal policies in place for dealing with EDI but have learnt over the years of how to support and engage with the needs of the different diverse communities across the borough. Using the NHS Guidance and recent Case Law Juridical Review in London Coroners that informed how to meet religious/cultural needs this is now embedded into the teams BAU.

Sandwell has good relationships with a range of local community organisations especially the Birmingham Muslim Society and has been instrumental in ensuring that the new cemetery in Rowley Regis was designed so that all communities can access the cemetery and have dedicated areas. They collect general data around, age, sex and religious beliefs, but have never been asked to report on this data, it is captured on the case management system but not corporately.

Areas of Development

Overall the council has a range of services where through default the needs of the protected groups have been considered in the design and delivery of services, however as mentioned previously there is no consistency in this approach and very little monitoring is taking place to ensure that all residents regardless of their protected group can access services and where they are not accessing services or finding it difficult to access, why.

Therefore, the council needs to have in-place systems to collect, analyse and measure how satisfied all sections of the community are with all services. The council needs to look at what the equality outcomes are for all under-represented groups in relation to service delivery.

The council needs to set up a robust Translation and Interpretation Service that is independent of the council and all staff know to access it.

Data collection and customer service data. These are all areas that need to be collected asap to enable the council to be confident that its services are reaching all communities regardless of their protected group.

Going forward the Council needs to ensure that it provides EDI evidence for inclusion in the Annual PSED Report to demonstrate compliance. Therefore, they will need to publish relevant, proportionate information:

- By setting specific, measurable equality objectives
- to show that they consciously thought about the three aims of the Equality Duty as part of the process of decision-making.
- The information published must include, information relating to employees who share protected characteristics (for public bodies with 150 or more employees)
- information relating to people who are affected by the public body's policies and practices and who share protected characteristics (for example, service users).
- Make the information accessible

Specific Actions

- The council needs to ensure compliance of the PSED requirement in relation to decision making and services, by developing a PSED report that incorporates the above elements
- The council with the Customer Services Team, will need to look at how it can start collecting customer service data at all access points so that the customer experience journey can be measured effectively.
- Ensure that all council buildings are compliant with Equality Act 2010 (Disability) Commission and analyse in-depth resident and customer surveys to gain a better understanding of the views and experiences of protected characteristics.
- Ensure that services consider equality of access for all during service design, planning or redevelopment
- Council should mandate that all service areas be collecting EDI service data. Work with the EDI team to establish a standard EDI monitoring form and questions that need to be incorporated in surveys/questionnaires etc
- Council policies/strategies and key documents don't appear to offer residents/customers the option to have documents in different formats, need to have a standard statement to be included in all policies/strategy's documents etc e.g. top 5-6 community languages and accessible format as a minimum.
- Council needs to establish an independent organisation(s) that can provide access to translation and interpretation services including BSL etc. Review use of staff providing translation and interpretation services.
- Progress report on the implementation of the Accessible Information Standards from ASC, learning from this standard could be shared as good practice across all council services.
- A large majority of key service strategy policies are out of date or in draft format, Council needs to create a more robust system of keeping on top of policies that are due for review or refreshing due to best practice or legislation change.
- Review of Council's website to ensure full compliance with Web Content Accessibility Guidelines version 2.1 AA standard.



Section 4 Diverse Engaged Workforce

4.1 Workforce Diversity and Inclusion

We recognise the vital part our colleagues play in achieving the Council's **EDI transformational journey** and therefore it is imperative that we have in place the right practices and procedures to ensure that we can operate in an inclusive environment that delivers the right services to our continually diverse communities and that we have in place a workforce that reflects our borough demographics.

The Council is currently developing its '**Workforce Strategy (Our People Strategy)**'. (Our People Strategy will support the delivery of the Council's priorities as set out in the Corporate Plan, with particular reference to the enabling objective **One Council One Team**, The strategy will aim to address current and future workforce challenges, to ensure that the council has the right employees it needs, in the right places with the right skills and knowledge.

An EDI Workforce Action Plan was developed and published during 2020. The purpose of this document was to set out a roadmap to help embed EDI across the Council. The Action Plan is now slightly out of date and does require urgent updating,

A number of the actions contained within this action plan should have put the council in a different position in relation to EDI if they had been implemented earlier.

It is unclear why there have been delays in the implementation of this plan, as it appears to have highlighted a number of the key actions that the council needs to implement, which are also borne out in this audit.

The council has a very good understanding of its local population and labour market and uses this data as a comparator in the annual Workforce report. The Council has set a number of **Organisational Health Indicators** that focus on addressing inequalities in its workforce representation. However, there are currently no specific targets set for 2023/24 and no specific action plans could be found that set out how the council is planning to meet its previous targets and also the targets it proposes to set for 2023/24. It is unclear what rationale is been used for setting of targets.

The council has an EDI Monitoring form which is attached to the application form process. Not sure if the current template has been updated to reflect the 2021 census and best practice measures. Even though data on all the protected groups are collected, the council does not report on all of them through their **Annual Workforce Report**.

The current workforce, according to the **Annual Workforce Report dated April 2022**, 3963 employees. The data captures three protected groups via the HR systems (disability, ethnicity, and gender(sex):

- **Disability** across the workforce 4.5% employees have declared that they have a disability, 4.5% are unknown and 91% of the workforce have declared that they do not have a disability. The economically active population in relation to disability is 5.6%. The current data indicates that disabled employees in the workforce remained consistent over the reporting period (approximately just over 4%).
- The **Ethnicity** profile of the council is based on the 2022 workforce data, 24.2 % are from an ethnic minority background compared to 34.5 economically active, staff from a White background make up 73.3% and economically active is 65.5%. employees from ethnic minority backgrounds are

under-represented based on the economic active population for Sandwell. The council has 1.9% unknown staff members who have not disclosed their ethnicity.

- The data indicates that ethnic minority employees in the workforce remained consistent over the reporting period (approximately 25%). For the ethnic minority data set the council has incorporated all staff members who have identified as non-White. But it has not disaggregated the data for inclusion in the Annual Workforce data, which means that the report does not truly reflect the ethnic minority groups as detailed in the Census 2021 and the Council's EDI monitoring form. The current approach treats all staff members from an ethnic minority group as a homogenous group, which they are not.
- **Gender (Sex)**, the council's workforce;
 - 58.3% are Women (economically active population is 49.3%).
 - 41.7% are Men (50.7% economically active population is 50.7%).
- The data indicates that the Gender (Sex) composition for employees in the workforce remained consistent over the reporting period with males being underrepresented within the Council's overall workforce, in comparison to their make-up in the borough. No specific action plans are in place to address the static position of the workforce across the three reported protected groups.

The council's current leadership also does not reflect the population demographics and no specific targets or plans are in place to address this area, the latest data shows:

- **Ethnicity Service Managers**- The percentage of ethnic minority employees has decreased quite significantly for service managers. The most recent data shows that there were no service managers from an ethnic minority background, from 3% in 2020/2021 to 0% in 2021/2022.
- **Ethnicity Service Directors** - The most recent data for service directors within the council shows that 33% of service directors within the council were from an ethnic minority background. This is in line with the latest figure for Sandwell's economically active population (ages 16+), the ethnic minority population is 34.5%. Source: ONS—Annual Population Survey (Jan 21—Dec 21).
- **Disability Service Managers** - The most recent data for service managers shows that in the reporting period there were no service managers with a disability. However, in 2022 the disability status for 16% of service managers was unknown. Therefore, the data collected may not be fully representative of the current situation. Currently, there is no disability data for 25% of service directors in 2021/2022
- **Disability Service Directors** - There has been a decrease in the number of service directors with a disability. In 2017/2018, 11% of service managers identified themselves as having a disability. The following year, this decreased to 9% and over the last 3 years (2019/2020, 2020/2021, 2021/2022) 0% of service Directors declared a disability.
- **Gender Service Managers** - in 2021/2022 44% of service managers were male and 56% were female
- **Gender Service Directors** - The most recent data for senior management within the council shows that 56% of senior management within the council are female and 44% male. The number of female employees in senior management has increased drastically since 2017/2018 where only 11% of senior management were women.

The council has annually produced and published its Annual Workforce Report, which for a number of years has only produced limited workforce data and only reports on three protected groups. There does not appear to be any plans to move towards incorporating the other protected groups,

The council has a set of Organisational Health Indicators, of which 7 have been developed to address

the disparities relating to workforce under-representation. 4 of the indicators are going in the right direction of travel based on 2022/23 target and the remaining 3 are indicating red, which equates to a decrease in achieving the set targets

Currently SBS self-service only allows staff to update their personal EDI information relating to their age, ethnicity, gender, religion or belief, sexual orientation and disability protected groups, however even though the council has the data it does not report on these protected groups.

The council is in the process of updating its HR system to **ORACLE Fusion** which will enable all data to be collected in one place and therefore it is envisaged that the council will have access to better data over time and this should improve the overall collection of EDI data Oracle Fusion is a system that will change and improve a wide range of our processes such as:

- Accessing learning
- Recruiting

The new system will have to following impacts on:

Employees:

- A new system to update your personal information and access content such as your pay slip
- A new way to record and manage your annual leave

Line managers:

- More standard ways of processing changes and approving employee requests
- One place to update and check information about your team

The Council has achieved **Disability Confident Employer Status**, which is the second level of the Disability Confident standard with level three being the highest. The council obtained the Disability Confident Employer Status in 2017. The status has since been reviewed every two years. The current award is in place from 2022 to 2025. Plans will be developed to move the council from level two to level three before the next accreditation in 2025.

The EDI regularly produces specific EDI Bulletins to support awareness events, e.g., Ramadhan 2023, LGBT+ History Month, Race Equality Week, Black History Month and UK Disability History Month to name a few.

Good Example

The council has in place an **apprenticeship programme** that provides a wide variety of apprenticeships over many technical

and professional occupations and also apprenticeships in management and leadership. The levels of apprenticeships range from level 2 up to level 7 master's degree equivalent. We have approx. 62 apprenticeships, 12 are from an Ethnic Minority background and 52 from a White background (April 2022).

Areas of Development

The council's current workforce is under-represented for a number of the protected groups based on the population demographics. There is little evidence of what the council is doing to address under-representation. Of the 7 Organisational Health Indicators for 22/23 relating to workforce diversity 4 were heading in the right direction and 3 were not. There appears to be no plans or initiatives in place to address the lack of direction and also to address the under-representation.

Concern is raised regarding the lack of data collection around the council's workforce and particularly on an annual basis since 2017 the council has published its Annual Workforce report, with just 3 protected groups and not reporting on all areas of the council's workforce. There does not appear to be any plans addressing why they are only reporting three protected groups and what plans are in place to include the other protected groups. -

Lack of key strategies is also not helping the council to meet its legal responsibilities, (Our People Workforce Strategy), this is a familiar pattern across the council where there is either outdated strategies/policies or they are in a draft format.



Specific Areas

- Refresh and update EDI monitoring template in line with Census 2021 and best practice
- EDI workforce annual report needs to disaggregate by the protected groups, subcategories of the protected groups and workforce targets need to be set
- Completion and implementation of the Workforce Strategy
- Agree to take forward any relevant actions from the EDI Workforce Action Plan
- Unknown/not disclosed data – Work with the HR team to create a plan to encourage staff to update their protected groups on the SBS service.
- HR to develop action plans to support addressing improving workforce representation.
- To improve recruitment, to attract a diverse pool of candidates that is reflective of our local community and current candidate market
-
- Improve recruitment practices, e.g., positive action initiatives need to be introduced and implemented to address workforce representation at all levels.
- Compliance with the PSED – need to incorporate all the protected groups and all areas of the workforce and action plans where there are gaps in information
- Access Staff networks to establish methods to help with identifying ways to improve workforce representation.
- Develop plans to move the council from Disability Confident standard level two to three

4.2 Inclusive Strategies and Policies

Strengths

The council has a range of workplace strategies and policies that can be accessed via the HR portal on the Council's intranet. It cannot be verified how many include EDI considerations and how many have had a full robust EIA completed.

There are no current mechanisms to track strategies and policies that are required for review or refresh, this has resulted in a number of strategies and policies being out of date or in a draft format.

Good Examples

- A **Disability Passport** is a voluntary document completed by an employee and their line manager. It provides a framework within which to discuss the employee's disability and health, and what changes can be made at work to assist them.
- The disability passport is designed to provide a documented record of an individual's needs, which will allow them to function to their full potential in a supportive and encouraging environment. This policy has been developed in accordance with the Equality Act 2010, Health and Safety at Work Act 1974, UK Employment Legislation, Home Office and ACAS Guidelines.
- The passport includes employee adjustments if adjustments have been approved and any comments from the manager. It is stored on the employee's SBS Human Resources file and is accessible by the current manager, the employee and Human Resources.

Area of Development

From the desktop exercise, it was not possible to find what monitoring is built into all strategies/policies and how they are tracked to ensure that implementation is not disproportionately being applied to staff from protected groups. In particular, this includes, recruitment and selection policies, grievance and disciplinaries, exit questionnaires and interviews, staff engagement activities/initiatives (including what effective communication methods are used), how to effectively manage difficult conversations and what toolkits are available to support managers.

Specific Areas

- Create a tracking system to ensure all future strategies/policies are updated, reviewed, or refreshed in a timely fashion and that the EIAs are completed with the full involvement of the EDI team and staff network members.
- Ensure monitoring and EDI is built into all HR strategies/policies.
- Incorporate EDI objectives into appraisal processes.

4.3 Collecting, Analysing and Publishing Workforce Data

Strengths

Workforce data is collected annually via self-service for existing employees and via job application form for new employees. Currently the only data that is analysed and monitored is gender, disability and ethnicity. No analysis of other protected characteristics is being done; however, information is collected, and raw data is available. Raw data is not shared outside of the HR team due GDPR restrictions. Oracle Fusion will go live in the next financial year – this may provide a route for data to be shared and a better range of data.

The council's Employee Self Service system called SBS, allows employees to update some of their protected characteristics. However, the only categories that employees can update personally are Religion or Belief, Sexual Orientation and Disability - the other categories, require changes via HR (change of name/marital status). It is envisaged that the other protected groups are sourced from the employee application forms. An initial concern is what happens if the employee hasn't completed those fields on the application form. Clarity is required on how those fields will be updated in Oracle Fusion.

The council publishes the two statutory reports each year, which are the **Annual EDI Workforce Report and the Gender Pay Gap Report**. The council has not developed any action plans to address gaps in workforce data. Some comments in relation to the two workforce reports are detailed below:

EDI Equality monitoring reports

- The way that data is presented in infographic format makes it more accessible for people who are not experts in data analysis.
- Using the economically active population data as a comparator against the council workforce data
- Data collected is based on the format of gender and grades, ethnic group and grades, disability and grades, full-time/part-time by grades, gender and age bands, gender and service bands
- Disability Low report rates (58%) for self-service disability – HR have requested support to decrease this figure and gain more understanding of disability at Sandwell
- Disability data is currently via two different sources (via HR input and via ESS) moving forward this will only be in one place. It is envisaged, that when future reports are pulled, the number of disabled employees will drop due to low report rates

Mixed ethnic group

- A breakdown of this category is available, although data cleansing is needed

Employee leavers data

- This data is collected but has not been analysed for the past few years
- The most recent leavers data will be sent to us once it has been anonymised
- Exit interviews are completed and filed under employee's digital file, any issues are flagged with the relevant director

Gender and equality pay gap

- Ethnicity pay gap – analysis did not find a significant difference in pay for ethnic minority employees, no action plan is in place Gender pay gap – this has been published annually but no plans in place to address any issues arising from the report

Dignity at Work/Harassment

- Only grievance and disciplinary data is collected at the moment, but not by protected groups
- When Oracle Fusion goes live this may be collected

Recruitment and Selection

- The council currently is not reporting its recruitment and selection data as part of its workforce annual report
- The majority of council jobs are placed on the WM jobs site, the council also uses a range of job boards and local voluntary organisations. .
- Review of the recruitment and selection strategy to align it to EDI and best practice

The council produces quarterly and annual Sickness Absence Reports by Directorate. The reports show absence data for various reasons, including pregnancy related sickness, and absence for mental health, depression and stress. The report however does not align to disability which in itself could be the causes to the levels of sickness identified in the report.

4.4 Learning, Development and Progression

Strengths

A specific Learning and Development Strategy/Policy was not found to support this area of the criteria. However, on the Councils' intranet the team has a dedicated page, which houses a range of information and resources to support employees in learning and developing themselves.

The page houses **Meet the team, Employee Induction Virtual Learning and E- Learning**. The E- Learning Packages has a resulted due to the Pandemic where the majority of face-to-face learning moved to a range of E-learning packages. However, some of the learning is slowly moving back to face-to-face, recruitment and selection.

Through the Council's Induction programme '**Welcome to Sandwell**' EDI is part of the E-learning package; however, it is not mandatory for all staff just for managers. The recruitment and selection E-Learning package has EDI embedded into that programme. Virtual learning is available on Wellbeing, separate modules are available for employees and managers' wellbeing of employee's health.

Sandwell Learn is the central hub for all learning content including e-learning, policy documents, videos, toolkits and quizzes. A range of learning modules are available for managers linked to HR policies and specific modules are available for those employees entering a management role for the first time (Managers) and for those at Leadership level. Could not find any L&D programmes for any other protected groups.

No other direct EDI learning or development was found across the different E-Learning Platforms. No L&D data analysis has taken place since 2016/17, we are led to believe that there has been no capacity in the team to do this. However, this is also a compliance issue. The PSED requires public Sectors bodies, to provide annual data on their L&D activities relating to EDI broken down by the protected groups and to develop action plans to address any gaps in that information.

Due to limited data, could not evidence how the council is monitoring and demonstrating fairness in relation to progression opportunities, secondments and acting up across the protected groups. Also, couldn't find any strategies or policies to support this area of work. E.g., Talent management Plans.

It has been highlighted that the EDI team will be taking over the EDI L&D offer in the future. The team will need to pick this action up asap to address the organisational gaps in relation to EDI L&D. The types of L&D that will form part of the of the EDI offer will include, but not exhaustible:

- e-Learning module for Members
- Workshop for Members
- e-Learning and workshop for Managers.
- Halo Code –The Halo Code champions and protects the rights of individuals to embrace all Afro-hairstyles in the workplace.
- Equality Impact Assessment Training
- Work with the L&D team to look at identifying how EDI is embedded into all Council L&D programmes
- Webinars and awareness sessions
- Cultural Competency training

Good Examples

The Council in conjunction with the EDI team have delivered a range of awareness webinars relating to protected groups

- Trans Gender training webinar
- BHM Webinar
- Tackling Ableism

Areas of Development

From the limited evidence the council appears to be failing in delivering a range of EDI programmes, either mandated or optional programmes for its workforce to ensure that they have enough awareness, knowledge, and skills to deliver services to a diverse community and to work with a diverse range of colleagues. Currently the only EDI programme, is E-Learning EDI Programme that is attended by new starters; however, it is not mandatory for staff only managers.

There is no other EDI training offer available to staff and no real assurances how EDI is built into all other council L&D programmes. No L&D data has been collected since 2016/17, which is not compliant with the PSED.

It should also be noted that from the evidence the council has no other specific and targeted programmes for under-represented groups to support their progression into senior roles, there is also no awareness programmes around the protected groups to improve staff knowledge and awareness.

Specific Actions

- The EDI team will work in partnership with the L&D team to develop the EDI L&D Offer
- All future EDI L&D Offer programmes will capture EDI monitoring data that will be included in the Workforce Annual Report.
- EDI team to work with the L&D team to review all current L&D programmes to ensure that EDI is embedded or has separate modules.
- L&D to collect data on all L&D programmes which can be included in future workforce reports
- HR team and the EDI Analyst to create an EDI L&D Dashboard at Corporate and Directorate level
- Consider how mentoring, coaching, sponsorship and secondment to partners and other local employers could improve diversity at senior levels
- Develop a strategic plan to address fairness in relation to progression opportunities secondments, 'Acting Up'.
- Develop positive Action Plan

4.5 Health and Wellbeing (HWB)

Strengths

The Council has recently added additional resources to the HWB team, which has resulted in the team developing a HWB calendar that highlights and promotes awareness days (can be found on the Council's intranet HWB Hub).

The team now have over 50 Wellbeing Champions across the organisation and their role is to promote activities, encourage colleagues to access relevant health and wellbeing opportunities, collating activity data, sharing best practice and stories of success. A monthly newsletter is also published for all staff to find out about what is taking place across the HWB space.

The team also supports the in-house Occupational Health Service, the only data that is currently captured relates to the number of employees accessing the services, types of appointments, Directorate, Service and job titles. However, they currently do not collect data relating to any specific protected group.

The EAP and counselling service is provided by an external independent organisation and is open to all staff, EAP offers support 24/7 via telephone, email and text type. Only gender was obtained in terms of protected characteristic data collected.

The HWB has started to develop a range of initiatives for staff by accessing relevant staff demographic data, e.g., sickness and workforce data to organise and host various events, e.g., Men's Health Awareness Month (June) with a focus on prostate Cancer and Alcohol Awareness week (July). Other events will be taking place during October and the team will be hosting Menstrual to Menopause event.

The HWB is keen to work with the emerging Staff Networks to learn more about the different protected groups.

The team has developed specific training on the Sandwell Learn Platform regarding HWB, the team is currently developing content for an E-learning package on Menopause.

The organisation has pockets of staff who are Mental Health First Aiders, but no specific strategy to train staff to become Mental Health First Aiders.

The HWB Strategy is currently in draft, so we were not able to ascertain the level of targeted work that is envisaged for the future workforce.

Good Examples

- The team now has over 50 Wellbeing Champions across the organisation and their role is to promote activities, encourage colleagues to access relevant health and wellbeing opportunities, collating activity data, sharing best practice and stories of success.
- Role Profiles have been developed for Wellbeing Champions and Menstruation to Menopause Champions
- Role profiles have been developed for those taking on these roles
- A monthly newsletter is also published for all staff to find out about what is taking place across the HWB space.

Areas of Development

The HWB will review the EAP and Occupational Health to see how EDI data can be captured so that a better picture is gained of employees accessing these services.

Work with the EDI team to identify how targeted work can be undertaken to improve the HWB offer so it's more inclusive Promote HWB activities and specific health prevalence based on workforce population, e.g. diabetes, High Blood pressure etc





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