



# EQUALITY IMPACT ASSESSMENT (EIA)

## Race Equality Task and Finish Group Recommendations

**Service/policy/strategy/practice/plan being assessed:** [Race Equality Task and Finish Group Recommendations](#)

**Business Unit/Service Area:** [Race Equality Task and Finish Group](#)

**Is this a new or existing service/policy/strategy/practice/plan?**

[New plan](#)

**EIA Review team – list of members:**

[Cllr Mini Mangat](#), [Tracy Dolphin \(Head of People & Communications\)](#), [Tarandeep Mahal \(Human Resources Business Partner\)](#), [Graham Leach \(Democratic Services Manager\)](#) with support from [Keira Rounsley \(Warwickshire County Council Specialist\)](#)

**Do any other Business Units/Service Areas need to be included?**

[Human Resources and Democratic Services](#)

**Date of assessment:** [August 2021](#)

**Are any of the outcomes from this assessment likely to result in complaints from existing services users, members of the public and/or employees?**

Throughout the report we use the acronym 'BAME' (Black, Asian and minority ethnic), which might result in concerns raised by employees, however Warwick District Council (WDC) recognises its limitations as a term that combines and therefore dilutes the experiences of Black, Asian and other ethnic groups. When using the acronym 'BAME' we are specifically talking about non-White individuals, and will disaggregate it when developing and implementing the recommendations if approved.

## DETAILS OF SERVICE/POLICY/STRATEGY/PRACTICE/PLAN

### Scoping and Defining

#### **1. What are the aims, objectives and outcomes of the service/policy/practice/plan?**

In June 2020 the Council approved a motion, as part of the international response following the death of George Floyd, and as a result of that Motion the Overview & Scrutiny Committee were asked to establish a Task & Finish Group. The Task & Finish Group would be charged with undertaking a review of the Council's approach to equality and diversity, especially with regard to race. Its report to the Committee would include an action plan with a view to the Executive adopting the Committee's recommendations in the report and its action plan. The progress and outcomes of the action plan would be monitored by the Overview & Scrutiny Committee, with the expectation that measurable improvements would be made by 2023.

The report sets out the recommendations from the Task & Finish Group, supported by the Overview & Scrutiny Committee, in respect of equalities issues relating to the internal practice and policies, and the experiences by employees of WDC with a Black, Asian and Minority Ethnic (BAME) background.

The Cabinet:

(i) approach Stratford-on-Avon District Council to similarly endorse these recommendations that owing to the proposals to bring together staff as part of the consideration of a merger proposal,; (ii) that they endorse the use of the Race Equality Code 2020 and Race at Work Charter, as set out at Appendices 4 and 5 of the report, to underpin the equality, diversity and inclusion action plan each year. This will require the setting of agreed indicators, both quantitative and qualitative, so success can be measured against the action plan;

(iii) that the Chief Executive appoints a senior manager to be a champion for Race Equality within the organisation;

(iv) that they note that the current ethnicity data is based on the 2011 Census but will be updated following the publication of 2021 census data; and that this be used as the basis for the Council better reflecting the communities it serves;

(v) that they welcome the publication of the first data on the ethnicity pay gap in November 2020 and the commitment from this Council to produce this information annually;

(vi) that they endorse the intention, within the next five years, to increase the diversity in senior managers across the Council so that it is more reflective of the racial and ethnic diversity of the local community in the District;

(vii) that they endorse the intention, within the next three years, to increase the racial and ethnic diversity within the posts of Chief Executive, Deputy Chief Executives, Programme Director for Climate Change and Heads of Service, with a minimal expectation equivalent to one post, so that it is at least reflective of the racial and ethnic diversity of the local community in the District;

(viii) that they endorse the adoption of the Rooney Rule for all recruitment processes by Warwick District Council for vacancies at Service Manager, Head of Service, Deputy Chief Executive or Chief Executive position, and the Employment Committee is asked to identify how the current recruitment process for these roles should be revised to accommodate this approach;

(ix) that they endorse the approach that, subject to computer software changes being possible, from 1 April 2022, all applications for positions in the Council will be anonymised prior to short listing by the recruiting manager;

(x) that to support the delivery of the above recommendations, Officers are tasked to bring forward proposals for the introduction of a specialist role, for a given time period, and to address the need for other necessary supporting resources.

## **1. Who are the customers?**

Employees and Job Applicants.

**2. How has equality been considered in the development or review so far?**

This specific programme of work is reviewing the Council's approach to race and equality.

**3. What is the reason for the change/development?**

Purpose - refer to Point 1.

**4. How does it fit with Warwick District Council's wider objectives?**

Links to our People Strategy and addressing racial inequalities.

**5. Why might it be important to consider equality and the protected characteristics?**

This programme of work is reviewing the Council's approach to equality, diversity and inclusion (EDI), with a specific focus on the protected characteristic of race.

Information Gathering

**6. What sources of data have you used?**

- a. This links to the application of our disability confident scheme.
- b. In terms of employment at WDC (2019/2020 data):
  - At Grade H, 3 out of 12 are BAME
  - At Grade I, 1 out of 11 is BAME
  - At Grades A&B (Senior Managers), there is 1 BAME employee out of 27
- c. Compared with data from the 2011 Census, WDC's Black, Asian and minority ethnic (BAME) representation of 10.32% is roughly representative of BAME communities within Warwickshire (11.8%). At June 2020, 58 out of 512 WDC employees were BAME, while 46 officers had chosen not to record their ethnicity (disclosure of ethnic background is optional for employees and Members).

d. The ethnicity pay gap:

- There is an 8.9% pay gap between the **mean** hourly rate for BAME employees and those White British / unknown at 31 March 2020. However, on the plus side, the Council’s mean ethnicity pay gap has **reduced** by 3.8 percentage points from 12.7% since 2018.
- There is an 11.2% pay gap between the **median** hourly rate for BAME employees and those White British / unknown at 31 March 2020. However, on the plus side, the Council’s median ethnicity pay gap has reduced by 2.7 percentage points from 13.9% since 2018.
- In terms of **mean hourly bonuses**, those of BAME background earn less (£370.00) than White British employees (£413.33); the gap is 10.5% in favour of White British employees. However, in terms of **median bonuses**, those of BAME background earn more (£370.00) than total employees (£327.60) employees; the gap is -12.9% in favour of BAME employees.

e. Training Data

We include EDI in many of our sessions examples below with no. of delegates attending:

**2018 -2019**

Autism Awareness	41
Employee Support Training	11
Griffin	12
HR for non HR	38
MECC	118
Mental Health FA full	29
Mental health FA lite	43
Recruitment & Selection	20
Safeguarding	202
Social Media, Discrimination & the Law	268

**2019 - 2020**

CSE Awareness	209
Domestic Violence	30

Griffin	17
HR for non HR	67
LGBT + Awareness	10
MECC	15
Mental health Awareness	8
Modern Slavery	33
Prevent	88
Recruitment & Selection	29
Safeguarding	31
Sickness Absence Training	63
Social Media, Discrimination & the Law	53

f. Surveys

- Investors in People data although not specifically related to breakdown in groups has provided information to support the organisations people areas
- Staff surveys, moving forward declaration information will be requested to allow further analysis on all protected characteristics
- The work undertaken by WME with colleagues within the Council highlighted some areas of concern. It is recognised that although a limited number of staff participated (9) it identified, along with examples of best practice considered by the Group, that there is significant more progress to be made in developing the Council’s overall maturity in relation to race equalities. The view of one of the interviewees summarises the current position succinctly: ‘The WDC culture is ‘treating everyone the same’ when this is not the solution, and it is about giving people equal opportunities and addressing the imbalance.
- Unison feedback on both casework and anecdotal
- Internal audits – substantial

## **7. What does the data you have tell you about your customers and about protected equality groups?**

Within the information provided to the Group, no member of SMT identifies as BAME, which is not reflective of the wider organisation and community. It is recognised that to promote engagement with the wider community and to encourage a more diverse workforce, the community and applicants will look to see themselves within senior positions. The lack of BAME representation in senior management is considered to have a direct effect on the wider recruitment and engagement from and with the community. A positive change of culture is needed within the Council to help achieve a more diverse and inclusive workforce.

## **8. What do you need to know more about?**

- Applicant data for roles
- Updated census data to provide updated benchmarking information
- National and regional data for both private and public sector comparisons

## **9. How could you find this out and who could help you?**

- Awaiting updated data from Census
- New recruitment portal to provide further analysis

Engagement and Consultation

## **10. Who have you consulted with from protected equality groups?**

- West Midlands Employer's was commissioned as an independent organisation to carry out a survey and individual interviews with our ethnically diverse employees to better understand their experiences applying and working for WDC (9 employees came forward out of 58 declared)
- The recommendations were developed from the engagement and sharing of best practice the Task & Finish Group undertook.
- Engagement and consultation will drive the development and implementation of each recommendation once approved by Cabinet.
- As the workstreams are developed and implemented, engagement will be undertaken with the relevant stakeholders.

- Reporting back to Overview and Scrutiny Committee on progress in 12 months time.

### **11. Who else could you consult with?**

As we develop and implement the recommendations further engagement with relevant stakeholders and employees will be undertaken.

### **12. Who can help you to do this?**

- West Midlands Employers are reviewing a regional approach and will be one of the sources for support.
- WCC EDI specialist.
- Review of specialist resources required to support internally will be considered.

Monitor and Evaluate



**Analysis of impact and potential actions:**

Protected characteristics from the Equality Act 2010	What do you know? Summary of data about/feedback from your service-users and/or staff	What does this mean?		What can you do? All potential actions to: <ul style="list-style-type: none"> <li>• Eliminate discrimination/mitigate negative impact</li> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>
		Positive impacts identified ( <i>actual and potential</i> )	Negative impacts identified ( <i>actual and potential</i> )	
<b>Age</b>	This specific programme of work is reviewing the Council's approach to race equality, therefore the impact on age will be neutral, however intersectionality will be considered.			The intersection of age and race will be considered as part of the delivery of the recommendations. As part of implementing the recommendations this EIA will be reviewed and updated in line with developments.
<b>Disability</b>	This specific programme of work is reviewing the Council's approach to race equality, therefore the impact on disability will be neutral, however intersectionality will be considered.			The intersection of disability and race will be considered as part of the delivery of the recommendations. As part of implementing the recommendations this EIA will be reviewed and updated in line with developments.
<b>Sex</b>	This specific programme of work is			The intersection of sex and race will be considered as part of the delivery of the

Protected characteristics from the Equality Act 2010	What do you know? Summary of data about/feedback from your service-users and/or staff	What does this mean?		What can you do? All potential actions to: <ul style="list-style-type: none"> <li>• Eliminate discrimination/mitigate negative impact</li> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>
		Positive impacts identified ( <i>actual and potential</i> )	Negative impacts identified ( <i>actual and potential</i> )	
	reviewing the Council's approach to race equality, therefore the impact on sex will be neutral, however intersectionality will be considered.			recommendations. As part of implementing the recommendations this EIA will be reviewed and updated in line with developments.
<b>Race</b>	See Section 7	Benefits include:  Proactive measures will aim to increase the racial and ethnic diversity representation within senior management.  'Anonymising' candidates will aim to remove unconscious bias in selection.		Recommendations aim to increase the ethnic diversity of applicants and employees, including at Senior Leadership level, so that WDC's workforce represents the diversity of Warwickshire at all levels within the organisation and there are no barriers to progression, resulting in increased performance.  We recognise that diversity and inclusion across the Council plays a role in this and that we all have different talents, different attributes and bring different skills to the table, and by increasing the diversity of our workforce we'll be able to develop, adapt, innovate and progress.

Protected characteristics from the Equality Act 2010	What do you know? Summary of data about/feedback from your service-users and/or staff	What does this mean?		What can you do? All potential actions to: <ul style="list-style-type: none"> <li>• Eliminate discrimination/mitigate negative impact</li> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>
		Positive impacts identified ( <i>actual and potential</i> )	Negative impacts identified ( <i>actual and potential</i> )	
		<p>We will consider the intersection of other characteristics,</p> <p>To develop inclusion 'maturity', the best practice from examples such as the Race Equality Code 2020 and the Race at Work Charter can be utilised.</p> <p>Ongoing monitoring of the recruitment process to identify the diversity of</p>		

Protected characteristics from the Equality Act 2010	What do you know? Summary of data about/feedback from your service-users and/or staff	What does this mean?		What can you do? All potential actions to: <ul style="list-style-type: none"> <li>• Eliminate discrimination/mitigate negative impact</li> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>
		Positive impacts identified ( <i>actual and potential</i> )	Negative impacts identified ( <i>actual and potential</i> )	
		<p>applications being made to the Council, how these are progressing and the diversity within the Council overall.</p> <p>It is recognised that to promote engagement with the wider community and to encourage a more diverse workforce, the community and applicants will look to see themselves within senior positions. The actions to</p>		

Protected characteristics from the Equality Act 2010	What do you know? Summary of data about/feedback from your service-users and/or staff	What does this mean?		What can you do? All potential actions to: <ul style="list-style-type: none"> <li>• Eliminate discrimination/mitigate negative impact</li> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>
		Positive impacts identified ( <i>actual and potential</i> )	Negative impacts identified ( <i>actual and potential</i> )	
		<p>increase BAME representation in Senior Management is considered to have a direct effect on this.</p> <p>The introduction of the Rooney Rule is considered appropriate for the Council to promote a more inclusive Senior Management team. Application of the Rule for key managerial positions requires a racially diverse set of candidates for consideration</p>		

Protected characteristics from the Equality Act 2010	What do you know? Summary of data about/feedback from your service-users and/or staff	What does this mean?		What can you do? All potential actions to: <ul style="list-style-type: none"> <li>• Eliminate discrimination/mitigate negative impact</li> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>
		Positive impacts identified ( <i>actual and potential</i> )	Negative impacts identified ( <i>actual and potential</i> )	
		<p>and will widen the talent pool.</p> <p>The specialist role proposed can review the work and findings of the Group and develop a wider action plan for consideration by Senior Management and Members.</p>		
<b>Religion or belief</b>	This specific programme of work is reviewing the Council's approach to race equality, therefore the impact on religion and belief will be neutral, however			The intersection of religion or belief and race will be considered as part of the delivery of the recommendations. As part of implementing the recommendations this EIA will be reviewed and updated in line with developments.

Protected characteristics from the Equality Act 2010	What do you know? Summary of data about/feedback from your service-users and/or staff	What does this mean?		What can you do? All potential actions to: <ul style="list-style-type: none"> <li>• Eliminate discrimination/mitigate negative impact</li> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>
		Positive impacts identified ( <i>actual and potential</i> )	Negative impacts identified ( <i>actual and potential</i> )	
	intersectionality will be considered.			
<b>Gender Re-assignment</b>	This specific programme of work is reviewing the Council's approach to race equality, therefore the impact on gender re-assignment will be neutral, however intersectionality will be considered.			The intersection of transgender and race will be considered as part of the delivery of the recommendations. As part of implementing the recommendations this EIA will be reviewed and updated in line with developments.
<b>Pregnancy and Maternity</b>	This specific programme of work is reviewing the Council's approach to race equality, therefore the impact on pregnancy and maternity will be neutral.			As part of implementing the recommendations this EIA will be reviewed in line with developments.
<b>Sexual orientation</b>	This specific programme of work is			The intersection of sexual orientation and race will be considered as part of the delivery of the

Protected characteristics from the Equality Act 2010	What do you know? Summary of data about/feedback from your service-users and/or staff	What does this mean?		What can you do? All potential actions to: <ul style="list-style-type: none"> <li>• Eliminate discrimination/mitigate negative impact</li> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>
		Positive impacts identified ( <i>actual and potential</i> )	Negative impacts identified ( <i>actual and potential</i> )	
	reviewing the Council's approach to race equality, therefore the impact on sexual orientation will be neutral, however intersectionality will be considered.			recommendations. As part of implementing the recommendations this EIA will be reviewed and updated in line with developments.
<b>Marriage and Civil Partnership</b> <i>(Note: only in relation to due regard to eliminating unlawful discrimination)</i>	This specific programme of work is reviewing the Council's approach to race equality, therefore the impact on marriage and civil partnership will be neutral.			As part of implementing the recommendations this EIA will be reviewed and updated in line with developments.



### 13. Outcomes of Equality Impact Assessment

The timescale and responsibility will be allocated once the recommendations have been approved.

Action	Timescale	Responsibility
Approach Stratford-on-Avon District Council to similarly endorse these recommendations based on proposals to bring together employees as part of the consideration of a merger proposal	TBC	TBC
Working with Overview & Scrutiny and Employment Committees/Cabinet to implement the recommendations	TBC	TBC
Review and monitor EIA in line with developments, including engagement and consultation	TBC	TBC
As part of this plan we will disaggregate 'BAME' (challenge on acronym)	TBC	TBC
To collate the diversity of respondents as part of our surveys	TBC	TBC
Review of recruitment data as part of declarations and progress to role	TBC	TBC
Further development of action plan with specialist	TBC	TBC
Review resources required to develop actions plan	TBC	TBC
Consider all recommendations and provide further detail to achieve	TBC	TBC

**Date of next review:** [Once the recommendations have been approved.](#)

**Name and signature of Officers completing the EIA:**

[As EIA Review Group.](#)

*NEXT STEPS: Once completed, share the document with your Head of Service to gain their signature.*