Making equality and diversity a reality

Our diversity scheme 2006-2009
Employees of the Audit Commission who wish to complain about us failing to meet our equalities duties can do so by raising the matter with their line manager, Human Resources (for employment-related issues) and the Diversity team (for all other issues).

People outside of the Audit Commission may complain by contacting:

Complaints Unit Manager
Audit Policy and Appointments
Audit Commission
Westward House, Lime Kiln Close
Stoke Gifford, Bristol, BS34 8SU
Email: complaints@audit-commission.gov.uk
Foreword 4
Introduction 6
1. Our vision and commitment 14
2. Our progress so far 24
3. Leading our equality and diversity work 30
4. Involvement and participation 34
5. Using information to manage performance 40
6. Impact assessment 50
7. Developing our capacity 56
8. Our priorities and action plan 60
Appendix 1 – Our statutory responsibilities and supporting functions 86
Appendix 2 – Summary of consultation results 92
Appendix 3 – List of external stakeholders 94
Appendix 4 – Equality BVPIs 95
Appendix 5 – Policy review schedule 97
We are pleased to present our Equality and Diversity Scheme 2006-2009, *Making equality and diversity a reality*. By ‘equality’ we mean treating people fairly. By ‘diversity’ we mean valuing people’s differences.

This document brings together and strengthens the work we have done on equality and diversity over the last four years. We have made a lot of progress towards improving how we include equality and diversity in the processes within our organisation and the work we do with public organisations, but we still have much to do.

We have substantially revised the Scheme as a result of our consultation and the valuable comments we received from our staff and external stakeholders. This revised Scheme gives more detail about the arrangements and processes we have in place which help us to meet our general and specific duties under the Disability Discrimination Act 2005, the Race Relations (Amendment) Act 2000, the Equality Act 2006 and the Employment Equality Regulations for Age, Religion or Belief and Sexual Orientation.

We have also produced separate versions of this combined Equality and Diversity Scheme for those who are interested in finding out how we will promote equality of opportunity and tackle discrimination and harassment for disability, race and gender.

We aim to be recognised as a leader of diversity and equality in our work and as an example of good practice in employment. We think that this Scheme describes our ambition and the activities which will deliver this. We welcome your continued views about how well we are doing over the three years covered by our Scheme.

**Steve Bundred | Chief Executive**
Introduction
Since we produced our first Diversity Scheme, *Building an inclusive organisation*, there have been a number of changes that affect equality and diversity in the work we do. A new law for disability equality came into force in 2006 and for gender equality in 2007. Together with the European directives on religion, belief and sexuality this means that public services have an even greater duty to show how they promote equal opportunities and make sure they do not discriminate when providing services and employing people.

We published our first Diversity Scheme in 2002 and revised it in 2004. This Scheme took a single approach to building equality for race, disability, gender, age, sexual orientation, and religious faith. Our new Scheme, *Making equality and diversity a reality 2006-2009*, builds on the original following the learning from our success so far.

Our approach to equality and diversity is to focus on the people who need public services by looking at their whole identity. We recognise that currently many people do not experience fair access to services or a fair quality of life. This can have an adverse impact on the opportunities available to them as they progress through their lives. People can experience discrimination, harassment and other barriers to participation as a result of different aspects of their identity such as race, disability, gender, age, sexuality, religion and belief.

The specific incidences can happen at different points in their lives or interactions with public services but can have a deep and lasting impact.

Many of the actions we can take to tackle discrimination and harassment and promote equality are equally applicable to all equality groups. We produce a single Diversity Scheme which covers age, disability, gender (equality between men, women and people who are transgender), sexuality, race, religion and belief as we believe that this helps us to tackle experiences of multiple discrimination more effectively through our work with public services.

We recognise, however, that although the three equality duties for race, disability and gender are very similar in spirit there are important differences between them. These differences reflect the specific experience of inequality and discrimination of each particular equality group. We have, therefore, produced separate versions of our single Diversity Scheme for those who are interested in finding out how we will promote equality of opportunity and tackle discrimination and harassment for each specific group. This document is our combined Equality and Diversity Scheme.
Who we are and what we do

The Audit Commission is an independent body responsible for ensuring that public money is spent economically, efficiently and effectively, to achieve high-quality local services for the public. Our remit covers around 11,000 bodies in England, which between them spend more than £180 billion of public money each year. Our work covers local government, health, housing, community safety and fire and rescue services.

Our mission is to be a driving force in the improvement of public services. We promote good practice and help those responsible for public services to achieve better results for people. We keep a focus on those who need public services most because we firmly believe that everybody has a right to fair treatment and high-quality services.

Our priorities for our work are set out in our five strategic objectives:

- to raise standards of financial management and financial reporting;
- to challenge public bodies to deliver better value for money;
- to encourage continual improvement in public services so they meet the changing needs of diverse communities and provide fair access for all;
- to promote excellence in governance and accountability; and
- to stimulate significant improvement in the quality of data and the use of information by decision makers.

Our approach to equality and diversity is to focus on the people who need public services by looking at their whole identity. We recognise that currently many people do not experience fair access to services or a fair quality of life.

The way in which we carry out our work is underpinned by our commitment to:

- independence, acting with integrity and objectivity, basing all our judgements on evidence alone with a willingness to speak without fear of favour;
- promoting high-quality public services and the ethos of public services management;
• promoting value for money, recognising that public money which is provided involuntarily by taxpayers is special;
• championing diversity and equality and the need to treat all people fairly and with respect, taking account of their individual needs;
• respecting the environment and protecting the vulnerable, acknowledging our duty to those who cannot speak for themselves including future generations;
• being an exemplary employer, accountable and transparent in the way we operate and a learning organisation, practising what we preach to others; and
• being a good partner.

Our statutory responsibilities and supporting functions

Our focus is on the performance of local public services as reflected by our statutory responsibilities:

Audit
• Appointing auditors to local authorities, health bodies, police, probation and fire authorities.
• Setting the required standards for our appointed auditors through the Code of Audit Practice.
• Regulating the quality of audits and the work auditors do.

Performance
• Assessing the performance of local authorities and fire authorities.
• Carrying out inspections of best value authorities (environment and culture only).
• Carrying out inspections of housing services, housing associations and arm’s length management organisations.

National studies
• Carrying out national studies designed to promote economy, efficiency, and effectiveness in providing council services, housing services and managing finances in the NHS.

In order to fulfil our statutory duties we also carry out the following functions:
• employing people;
• working in partnership with a range of organisations;
• procuring goods and services; and
• providing information to our stakeholders, including the public.

Audit makes up 80 per cent of our work. The Comprehensive Performance Assessment (CPA) programme shapes how we assess the performance of local councils. As part of CPA we undertake corporate assessments of individual local authorities and also inspect local authority provision of housing, culture and environmental services, although the number of inspections is declining through our policy of strategic regulation. Other regulators look at children and young people services and adult social services.
We have set out more information about how we carry out each of our statutory duties and supporting functions in Appendix 1.

Our remit in assessment is changing. From 2009/10, working with other inspectorates, the Commission will lead an area-based risk assessment. As a result there will be major changes to the performance assessment framework for local government through the development of Comprehensive Area Assessment (CAA). The outcome of the risk assessment will inform the Commission’s and other inspectorates’ inspection programmes. In preparation for this change we are currently reviewing our structures and methodologies to ensure the Commission is fit for purpose.

Our structure
Our statutory duties and supporting functions are delivered by seven central directorates:

- Local Government, Housing and Community Safety;
- Health;
- Policy, Research and Studies;
- Human Resources (HR);
- Audit Policy and Practice;
- Communications and Public Reporting; and
- Corporate Services – including finance and planning, business information services, estates and facilities management, procurement, and legal.

And four regions:
- Northern;
- Central;
- London; and
- Southern.

What the law says
As a public authority, we have general duties to promote equal opportunities relating to race, disability and gender and to remove discrimination. Our responsibilities are set out in the:

- Disability Discrimination Act 2005 (DDA 2005);
- Equality Act 2006 (EA 2006);
- Equal Pay Act 1970;
- Race Relations (Amendment) Act 2000 (RRAA 2000); and
- Sex Discrimination Act 1975.

We must also meet our employment duties for age, sexuality, and religion or belief as set out in the following legislation:

- Employment Equality (Age) Regulations 2006;
- Employment Equality (Sexual Orientation) Regulations 2003;
- Employment Equality (Religion or Belief) Regulations 2003;

We aim to apply the highest standards from each of the duties to all six equalities groups.
Making equality and diversity a reality

Introduction

The core general duties are similar for disability, gender and race:

- promote equality of opportunity; and
- eliminate harassment and unlawful discrimination.

However, there are important areas where there are different legislative requirements between the general duties which set a higher standard:

- promote positive attitudes towards disabled people under the DDA 2005;
- promote good relations between people of different racial groups under the RRAA 2000;
- encourage participation by disabled people in public life under the DDA 2005; and
- take positive steps to take account of disabled people’s disabilities, even where that involves treating disabled people more favourably than other people under the DDA 2005. This means we have to take steps which go beyond treating disabled people and non-disabled people alike.

We also have specific duties which provide a framework to guide us in meeting our general duties in the most appropriate way. Many of the specific duties are similar for disability, gender and race:

- publish an equality scheme demonstrating how we intend to fulfil our general and specific duties;
- ensure the equality scheme includes a statement of our arrangements for:
  - assessing and consulting on the likely impact of our proposed policies on the promotion of equality;
  - gathering information in relation to employment and the delivery of our functions to monitor for any adverse impact on the promotion of equality;
  - putting this information to use, in particular, in reviewing the effectiveness of the action plan and in preparing subsequent equality schemes;
  - the steps we will take towards fulfilling the general duty (the action plan);
  - publishing the results of our assessments and consultation annually and reviewing the scheme at least every three years.

There are some areas where the different legislation is more specific or sets a higher standard:

- involve disabled people in the development of the Disability Equality Scheme under the DDA 2005;
- ensure the Disability Equality Scheme includes a statement of the way in which disabled people have been involved in its development under the DDA 2005;
- to consult stakeholders (in other words employees, service users and others including trade unions) and take account of relevant information in order to determine its gender equality objectives under the EA 2006;
• set out our gender equality objectives including objectives to address the causes of any gender pay gaps under the EA 2006;
• ensure public access to information and services which we provide under the RRAA 2000;
• train our staff in connection with the general and specific duties under the RRAA 2000;
• fulfil our employment duties under the RRAA 2000 and specifically to:
  • monitor, by reference to the racial groups to which they belong, the numbers of staff in post and applicants for employment, training and promotion;
  • monitor the numbers of staff from each racial group who receive training, benefit or suffer detriment as a result of our performance assessment procedures, who are involved in grievance procedures, or who are the subject of disciplinary procedures, and who leave the employment of the Commission; and
  • publish annually the results of our employment monitoring set out above.

Each of our statutory responsibilities and supporting functions is relevant to the general duties of the DDA 2005, EA 2006, and RRAA 2000. All these duties also apply to the organisations we audit and inspect, and to other inspectorates.

Who the Scheme is for
Our Diversity Scheme sets out what we are currently doing and planning to do over the next three years to meet our general and specific duties and achieve our aims for our equality and diversity work. We want our Scheme to influence and inform the organisations we work with, setting a standard for their own approach to equality and diversity and their equality schemes.

Our role is to influence better every organisation we work with, such as local services, contractors and audit firms, to deliver fairer services and promote equality and diversity through their work.

This Scheme enables all of our stakeholders – organisations that we work with and people who use services and have been involved in the development of this Scheme – to hold us to account for delivery of the activities we set out in our action plan. We welcome and encourage any comments you may have about our Scheme. These will help us to review and improve year on year.
Delivering our duties
The delivery of equality and diversity depends on successfully managing a broad change agenda, rethinking the way things are currently done. This requires a strategic, systematic and coherent approach led from the top. Our research has shown that the success factors for managing this are the same as for any successful change management. These factors also align well with the specific duties set out in the legislation.

We have structured our Scheme to show how we are approaching each factor:

- vision and commitment – Chapter 1;
- progress so far – Chapter 2;
- leading our equality and diversity work – Chapter 3;
- involvement and participation – Chapter 4;
- using information to manage performance – Chapter 5;
- impact assessments – Chapter 6;
- building capacity – Chapter 7; and
- priorities and outcomes (including our action plan) – Chapter 8.
1. Our vision and commitment
Public services have a vital role to play in delivering quality of life outcomes to every member of the communities they serve. As a regulator, the Audit Commission is influential in shaping improvement in public services so they effectively meet the diverse needs of local people. We have a distinct position as a public organisation, because we do not often work directly with the public. So we need to make sure we promote equality within our organisation and through our work with others.

Diversity, equality, human rights and focusing on service users are central to everything that we do. We have set out our commitment in our Strategic Plan. This commitment is based not only on legal obligations to ensure equal opportunities, but more importantly is good practice and helps to create an inclusive local environment.

Equality and diversity is embodied in our strategic objective to encourage the continual improvement in public services so they meet the changing needs of diverse communities and provide fair access for all.

For public services to improve they need good quality and timely information about their performance. This is also vital to their ability to understand and root out inequality. Our strategic objective to stimulate significant improvement in the quality of data and the use of information by decision makers is also highly relevant to improving performance on equality and diversity.

To support the delivery of the strategic objectives and to ensure the Commission is an excellently managed organisation, a number of priority improvement areas are set out in our Management Plan. This includes a specific objective to value diversity and promote equality. All managers have an explicit personal objective to deliver this, linked to their directorate or region’s equality and diversity plan.

Commitment to equality
There are specific groups within society who experience acute discrimination and inequality and who have been protected in law. We set out below our understanding of the nature of the inequality experienced by these different equality groups and our commitment to addressing this in our policies and practices.

The law regarding age, sexuality and religious or belief discrimination is less comprehensive than for race, gender, or disability. However, we believe it is right for us to aim to eliminate discrimination and harassment on grounds of religion or belief, sexuality or age and to promote equality between people of religions or beliefs, age groups and sexual orientation, as well as to comply with the employment regulations. We want to use our influence on local public services to encourage them to do the same.
We recognise that we have a duty to take positive steps to ensure all equality groups benefit fairly from our work and as an employer. We need to be proactive in removing the barriers that disabled people, black and minority ethnic people tell us they face, or are a result of gender segregation. People who responded to our consultation said they wanted us to use our influence on local public services to encourage them to do the same. We believe the most effective way of doing this is by meeting our general and specific duties under the legislation.

Age equality

A report by Age Concern in 2006 found that ageism does exist in the UK and that this form of discrimination is more commonly experienced across all age ranges than other forms of discrimination. Age discrimination is founded on a set of stereotypes about different age groups which in the case of older people leads to a form of benevolent prejudice. Older people are often characterised as non-threatening to the British way of life, friendly, moral and admirable but as less intelligent and less capable. Conversely, views about younger people can sometimes be the opposite, that they are aggressive, out of control, uncaring and threatening.

Box A
Examples of potential inequality experienced by different age groups

- Potential discrimination against carers. By 2026, more than 10 per cent of the population is projected to be over 75 years old. This is likely to impact on employment as caring rates are highest between 45 and 64, although one in five carers are aged 65 or over.
- Restricting access to the workplace, for example by enforced or incentivised retirement.
- Failing to offer choices in health and social care, and making assumptions that older people might not want the sorts of life chances that younger people do.
- Assuming that it is ‘natural’ for older people to have lower expectations, reduced choice and control, and less account taken of their views.


The Employment Equality (Age) Regulations 2006, which came into force in October 2006, make it unlawful to discriminate against employees and job applicants on the grounds of their age. A national default retirement age of 65 has also been set by the government. The regulations mean that:
employers may set a mandatory retirement age of under 65 only where they can give an ‘objectively justifiable reason’ for doing so;

• employees may request to continue working after they are due to retire, and employers have a duty to consider such requests;

• there is no limit placed on the amount of compensation which could be payable to successful employment tribunal claimants;

• the upper age limit for unfair dismissal and redundancy rights is removed;

• harassment and victimisation are prohibited; and

• caution must be exercised in giving length of service benefits. Many of these benefits may be open to claims of indirect discrimination. Benefits relating to periods of service of less than five years are permitted. Benefits accruing after more than five years’ service must be justified by reasons of business need, which may include encouraging loyalty, rewarding experience and motivating staff.

blindness and partial sight;

• deafness and hearing impairment; and

• progressive long-term health conditions such as multiple sclerosis and HIV.

And it also covers people who may not recognise themselves as having a disability, such as those with long-term conditions (for example, diabetes or cancer) or older people. Disabled people are not a homogenous group and may also be discriminated against because of other aspects of their identity such as ethnicity, age, gender, sexuality, economic status and religion or belief.

Using the widest definition, there are more than 11 million disabled people in the UK, more than one in five of the adult population and one in 20 children.

Disabled people do not always have the same opportunities or choices as non-disabled people and this can be particularly acute because the majority of disabled people have impairments that are not easily visible. They can experience discrimination, lack of respect, and unreasonable barriers to participation in society on an equal basis. Such barriers can be attitudinal, environmental and institutional. Although these barriers may sometimes be unintentional this does not lessen the negative impact upon disabled people.

Disability equality
Disability covers a variety of impairments such as:

• learning disabilities;

• mental health conditions;

• mobility impairments;
Box B
Examples of inequality experienced by disabled people in public services

- Only one in two disabled people of working age is likely to be in employment compared with four in five non-disabled people.
- The income of disabled people is on average less than half that of non-disabled people and they are more likely to live in poverty.
- Disabled people are more likely than non-disabled people to have no educational qualifications and less likely to have advanced educational qualifications.
- Disabled people face discrimination and harassment. One in four disabled people says they have experienced hate crime.
- Much of the social housing stock is unsuitable for disabled people with mobility or other impairments and inadequate or sub-standard housing can make some conditions worse such as asthma, heart conditions or mental health problems.
- Disabled people travel one-third less often than non-disabled people and physical access to public transport, such as getting on or off buses and trains, can be an issue.

- Low income, non-employment, and low education can all independently increase the probability of someone becoming disabled.

Source: Improving the life chances of disabled people, Prime Minister’s Strategy Unit, January 2005.

The concept of the social model of disability is the most effective starting point for our approach to promoting disability equality and tackling discrimination and harassment. The social model identifies that the poverty, disadvantage and social exclusion that disabled people can experience is not the inevitable result of their impairments or conditions. It results from the barriers constructed by society.

We have a distinct position as a public organisation, because we do not often work directly with the public. So we need to make sure we promote equality within our organisation and through our work with others.
Gender equality

We recognise that gender inequality is experienced by both women and men, girls and boys and our Scheme recognises the additional disadvantage faced by transgender people. The level of disadvantage faced will differ depending on factors additional to people’s gender such as age, ethnicity, religion or belief, sexual orientation, marital or civil partnership status, and whether or not they have a disability. This Scheme aims to identify and address gender inequalities and disadvantage faced by women and men.

Gender inequality is experienced across the full range of public services: in employment; access to public services; access and take-up of health care services; protection from crime and violent assault and use of transport.

Although public services have a great impact on the lives of women and men, there are often significant inequalities in the way these services are managed and delivered.

Box C
Examples of inequality experienced by women and men in public services

- The vast majority of people employed in local government services are women (70 per cent), yet only 29 per cent of elected councillors are women and even fewer women, 17 per cent, are chief executives of local authorities.

- Women form the majority of local government workforces and most are concentrated in lower paid and part-time jobs.

- Many women still bear the majority of the responsibility for childcare and, as a result of this, many women in employment are part-time workers. Forty-four per cent of women work part-time, compared to 10 per cent of men. Part-time work can limit career progression, lead to lower pay and reduced pensions.

- Thirty-eight per cent of mothers, 11 per cent of fathers and 18 per cent of carers have either left a job or been unable to take a job due to caring responsibilities.

- Health care services are not addressing the needs of men who are less likely to seek medical assistance than women, resulting in higher death rates for men from conditions that respond well to early diagnosis.

- The majority of people reporting as homeless to local authorities are single men.

- Young Pakistani, Bangladeshi and black Caribbean women are three to four times more likely to take a job at a lower level than the one they are qualified for.

- One-quarter of all violent crime reported is violent attacks on women by their partners and ex-partners (commonly described as domestic violence). Two women a week die as a result of these attacks.
• Young men between the ages of 16 and 24 are the most at risk from violent crime.

Source: Crime in England and Wales, a report of the Home Office; Gender statistics: an evaluation, a study by the Equal Opportunities Commission.

Race equality
People from black and minority ethnic communities experience multiple inequalities: 70 per cent live in the 88 most deprived neighbourhoods of the UK and they are more likely to be poor, with lower incomes spread across larger household sizes. They also continue to experience discrimination, stereotyping and racism. Gypsies and Irish Travellers face particularly acute discrimination as many local public services have low awareness of the needs of these particular communities.

These overall patterns also vary between and within different ethnic groups. The fact that race inequalities still exist is partly explained by the slow and sporadic progress being made by public services, despite 27 years of race relations legislation.

Box D
Examples of inequality experienced by black and minority ethnic people in public services
• Employment – Overall, black and minority ethnic people are more likely to be unemployed, irrespective of their qualifications, place of residence, sex or age. They are less likely to hold senior management positions.

• Education – Black, Pakistani and Bangladeshi pupils experience lower levels of educational attainment. Black pupils are more likely to be excluded from school.

• Health – African Caribbean people are more likely to be diagnosed with schizophrenia.

• Social services – Adults and older people from black and minority ethnic communities are less likely to be provided with social services following an assessment. Only 33 per cent of all social services users in England thought that matters of race, culture and religion were noted by local authority social services staff.

• Policing – Black people are eight times and Asian people three times more likely to be stopped and searched than white people. There is a strong perception among young black and minority ethnic people that the police assume that they are potential criminals. Indian, Bangladeshi and Pakistani people are more likely to be victims of crime.

• Housing – Black, Pakistani and Bangladeshi households are more likely to live in homes that fall below the Decent Homes Standard than white households.

We see a strong connection between successful community cohesion and integration and the effectiveness of local public service approaches to promoting equality and diversity and tackling discrimination and inequality. Public services, including the Commission, have an important role to play in facilitating a better informed and open debate about cohesion, integration and national identity. This must allow people to express their concerns constructively, focusing on building consensus and challenging the myths that have grown up around specific communities and diversity. Promoting diversity as a positive influence on our society is critical.

In 2003 the Employment Equality (Religion or Belief) Regulations came into force. This makes it unlawful to subject someone to direct or indirect discrimination, victimisation or harassment on the grounds of their religion, religious belief or similar philosophical belief. This protection was widened under the Equality Act 2006 to cover lack of belief as well. In addition the Human Rights Act (1998) upholds freedom of thought, conscience and religion and the manifestation of religion and belief.

**Sexuality equality**

Discrimination and harassment on the grounds of a person’s sexual orientation exists in the UK.

**Box E**

**Examples of discrimination against gay, lesbian and bisexual people**

- A gay couple were turned away from a Scottish guesthouse.
- A woman was refused a smear test by her local NHS simply and explicitly on the grounds of her being a lesbian.
- A man was referred to a publicly funded centre to help treat a dependence on alcohol and told there, by the counsellor, that he would have to ‘give up homosexuality’ if he wanted to get better.
• A London council eventually overturned its decision to only allow gay couples to sign the civil partnership register, and not have friends present and a celebration in the same way as heterosexual couples. But this decision came only after strong pressure and adverse publicity.

• A survey of gay, lesbian and bisexual people found that two-thirds of the respondents had been the victims of at least one homophobic incident. Many of the incidents described were very serious. Some were horrific. The most common homophobic incidents experienced by the sample were threats and intimidation, verbal abuse and physical assault. Only 18 per cent of respondents had reported to the police the incident they had described.


The Employment Equality (Sexual Orientation) Regulations came into force in 2003 and make it unlawful to discriminate against employees and job applicants on the grounds of their sexual orientation. The EA 2006 also makes provision for regulations to address discrimination in the provision of goods and services on the grounds of sexuality. These regulations came into force on 30 April 2007.

In 2005 civil partnership came into force which gives same-sex couples the ability to obtain legal recognition for their relationship. Civil partnership is a new legal relationship which can be registered by two people of the same sex. It gives same-sex couples the ability to obtain legal recognition of their relationship. Civil partnership came into force on 5 December 2005.

Our ethos

Through the Management Plan, we have clearly set out and communicated to staff what is expected of them. We expect our staff to:

• treat each other and clients with respect and dignity, putting into practice the principles of diversity and equality in daily working life;

• contribute to fulfilling their directorate or team’s diversity and equality action plan;

• agree diversity targets for themselves in work programmes and during performance appraisals with their line managers, and achieve those targets;

• as appropriate to their role, challenge local public services to include good practice on diversity and equality as part of all the services they deliver;

• take responsibility for their own learning and professional development, making good use of the opportunities and resources we offer; and

• follow equality laws and act in line with our HR policy and other policies.
We have also made clear to all staff that they can expect the Commission to:

- treat them fairly and in line with our legal duties and our HR policies;
- make sure everyone takes part in diversity training days, including age, disability, gender, race, religion or belief and sexuality equality training so that we do not discriminate against others;
- give every staff member equal opportunity for training, development and promotion, and make sure our recruitment and promotion processes are open and clear;
- encourage all staff and especially women, disabled staff and black and minority ethnic staff to take part in the Opportunities Mentoring Programme, where they can give or receive mentoring support; and
- give all managers the training and support they need to include the principles of equality and the steps they may need to take in the way they manage people and plan their work.

What we want to achieve

We want people and organisations we work with to see us as promoting equality and diversity, and as a leading example of good practice in employment. We play an important role in leading public services. We want to use our influence better to challenge local public service delivery of equality and diversity and support its improved approach. This will become increasingly important as more and more different communities make up the population.
2. Our progress so far
Making equality and diversity a reality

We have come a long way since the publication of our first Diversity Scheme in 2002 and significant progress has been made in three key areas:

- strengthening our arrangements for governing and delivering our equality and diversity programme;
- improving our approach as an employer; and
- taking steps to reflect equality and diversity better in our work with external organisations.

We have strengthened our arrangements for governing and delivering our equality and diversity programme which benefits our approach to all equality groups. We have:

- put in place a clear governance structure for our equality and diversity work through the creation of the Diversity Strategy Board (DSB);
- identified leaders at all levels of the organisation, clarifying their roles and allocating resources to help them do their work;
- established five staff networks and identified Audit Commission Management Team (ACMT) champions for each of them;
- increased the capacity of the corporate Diversity team;
- developed a communications brand, Everybody Counts, to help raise the profile of our work internally and externally;
- integrated diversity and equality action planning, monitoring and review into our existing performance management processes;
- improved how we gather and use information, particularly in relation to employment data;
- developed our approach to equality impact assessments (EIAs); and
- raised the understanding of the importance of equality and diversity through national events, regional and directorate management meetings, and team meetings.

As an employer we have improved our approach to equality and diversity:

- We have targeted our annual graduate recruitment scheme to improve the diversity of the graduates we appoint. This is an important way in which we can grow our own diverse workforce. In 2006, 24 per cent of these new recruits were black and minority ethnic, 51 per cent were female and 7 per cent disabled.
- We are a ‘two ticks’ disability symbol user and committed to good practice in employing disabled people. This means we have signed up to the five commitments on recruiting, retaining and developing disabled people, improving disability equality among key employees and reviewing and reporting on our performance annually. We interview anybody with a disability who applies and meets the minimum conditions for the job.
• We have carried out an accessibility review of all the buildings we own or rent. Action has been taken to ensure all our buildings are accessible to disabled people.

• We have trained the majority of our staff on the implications of the DDA 2005 and the RRAA 2000 to help them to reflect race equality issues better in their day-to-day work.

• We have trained the majority of our staff on understanding the impact of inequality and poor behaviours to help us develop a shared culture and set of values.

• We have trained audit and performance staff on implementing race and disability equality into the day job, helping them to identify what it means for their work.

• We have reviewed all our HR policies to ensure they help us to meet our general duties. This includes developing our policy on bullying and harassment.

• We have developed a system for ensuring reasonable adjustments are made for all new and existing employees. This involves the Health and Safety team liaising with the disabled person, their line manager and HR business managers to identify the adjustments needed.

• 51 per cent of our staff are female, 40 per cent of whom work at the higher levels within our organisation, with 25 per cent of our top 5 per cent of earners being women.

We have trained the majority of our staff on understanding the impact of inequality and poor behaviours to help us develop a shared culture and set of values.
In September 2006 we began monitoring the religion or belief of our employees. By the end of December, 41 per cent of staff had updated their employee record. Of these:

- 44.38 per cent are Christian;
- 22.59 per cent have no religion;
- 13.85 per cent prefer not to say;
- 7.83 per cent are atheist;
- 4.31 per cent are agnostic;
- 2.5 per cent are recorded as other;
- 1.36 per cent are Muslim;
- 1.02 per cent are Sikh;
- 1.02 per cent are Hindu;
- 0.68 per cent are Buddhist; and
- 0.45 per cent are Jewish.

In September 2006 we also began monitoring sexuality. By the end of December, 41 per cent of staff had updated their record. Of these:

- 82.88 per cent are heterosexual;
- 14.27 per cent prefer not to say;
- 1.6 per cent are gay;
- 0.68 per cent are lesbian;
- 0.34 per cent are bisexual; and
- 0.23 per cent are recorded as other.

The age profile of our workforce is:

- 16.9 per cent are 29 or younger;
- 28.8 per cent are between 30 and 39;
- 31.9 per cent are between 40 and 49;
- 13.3 per cent are between 50 and 54;
- 7.7 per cent are between 55 and 59; and
- 1.5 per cent of staff are over 60.

3.5 per cent of our employees are disabled but we know this figure is under-reported. We have run internal campaigns to encourage more people to record their disability on their employee record so as to improve our information and enable us more clearly to assess the impact of our policies and actions.

8.72 per cent of our employees are from a black and minority ethnic background; 2.77 per cent of the top 5 per cent of earners at the Commission and 7.29 per cent of our top three management grades are black or minority ethnic people.

We have reviewed our employment terms and conditions to:

- enhance maternity pay for women to 26 weeks’ leave on full pay, with 13 further weeks on statutory maternity pay;
- introduce carer’s leave of five days;
- increase paternity or partner leave to 10 days; and
- extend our flexible working policy to include provisions for working part-time, term times, and flexible start and finish times.
In our work with external organisations we have:

- Made the promotion of equal opportunities and elimination of discrimination and harassment explicit in our procurement framework.

- Reported on the approach to equality and diversity, community engagement, user focus and access to services of county council and single tier authorities in CPA since 2005.

- Integrated equality issues into our methodologies for use of resources in local government and the Auditors’ Local Evaluation (ALE) in health.

- Included a national assessment of how well councils are managing equality and diversity, community engagement, user focus and access to services in our 2006 report, *Learning from CPA in 2005/06*.

- Developed a key line of enquiry for equality and diversity to support our published judgements about the effectiveness and efficiency of local councils and fire and rescue authorities.

- Developed key lines of enquiry for our inspections of housing services to ensure our published judgements incorporate consideration of how effectively housing services meet the needs of different groups of people.

We created the Opportunities Mentoring Programme, designed to help all our staff develop their potential and to progress. It is the first initiative in the world to receive a Gold Standard from the International Standards for Mentoring Programmes in Employment.

- Developed key lines of enquiry for our joint inspections of the Supporting People grant programme. The Supporting People programme is a funding programme for services that support disabled and vulnerable people to enable them to live independently within the community.
• Developed the Knowing Your Communities toolkit and notable practice for local government. This enables councils to self-assess their knowledge of the communities they serve. There are specific toolkits to assist local councils to examine and understand how effective they are in meeting all their age, disability, gender, race, religion or belief, and sexuality duties. The toolkit is available to councils and the general public on the Commission’s external website.

• Tested our external website for disability access using the Shaw Trust Web Accreditation team.

• Reconfigured the Area Profiles data profile around the four Local Area Agreement (LAA) priorities. These include children and young people, and healthy communities and older people. This means that existing best value performance indicator (BVPI) data and contextual information can be viewed for each LAA block in each council area.

• Published a series of reports looking at equality and diversity in the public sector:
  • *Equality and diversity* (2002); and
  • *Directions in diversity* (2002).

Published national reports which look at disability issues specifically including:

• *Older people – independence and well-being: The challenge for public services* (2004); and

3. Leading our equality and diversity work
Our diversity and equality programme is led by ACMT and our Chief Executive takes a personal interest in the work. Two members of ACMT have explicit responsibility for the development, implementation and delivery of the Equality and Diversity Scheme: Andy McKeon, Managing Director for Health and Tracey Dennison, Managing Director for HR. Andy is also the Chair of the DSB. ACMT receives six-monthly progress reports on the delivery of our action plan.

The DSB meets every quarter to oversee the progress made towards achieving the outcomes set out in the Equality and Diversity Scheme. It advises and supports ACMT, helping the Commission achieve diversity and equality, focus on the service user and promote human rights. It enables us to improve our strategic approach and practices and keeps an overview of resources.

Membership consists of:

- two senior champions from ACMT;
- diversity champions from each of the four regional management teams and each of our seven central directorate management teams;
- representatives of the regional service leads for diversity;
- chairs of each staff network; and
- the chair of the diversity and equality representatives.

The DSB is supported and serviced by the Diversity team, led by the head of Diversity and based in the HR Directorate. This small team has a strategic remit and coordinates and supports the delivery of the Equality and Diversity Scheme. The team:

- monitors the delivery of the action plans, challenging and supporting progress;
- reviews the evidence gathered throughout the year to inform the annual review of the schemes;
- provides technical guidance, advice and support to Commission staff;
- supports the diversity champions, staff networks, regional service leads, and diversity and equality representatives, ensuring coordination and consistency;
- works with external stakeholders to ensure opportunities for involvement in the Commission’s work; and
- leads the Diversity, User Focus and Human Rights Knowledge Network.
Leadership at all levels
Leadership of this agenda is important at all levels of the organisation. This helps us ensure we set the right priorities, change our culture, raise expectations and increase accountability. Less senior individuals can make a valuable difference by influencing peers and changing behaviours. All our employees have a responsibility for integrating equality and diversity into our work. To support them the Commission has four groups of people who have a specific remit for diversity and equality:

- diversity champions;
- diversity and user focus regional service leads;
- diversity and equality representatives; and
- members of the staff networks.

Their roles are described in detail below.

Diversity champions
Each directorate and region has appointed a senior member of staff as a diversity champion. They are a member of the directorate or regional management team and are responsible for promoting all aspects of diversity and equality in both our internal and external work. They coordinate the management and delivery of directorate and regional equality and diversity action plans. They also contribute to the development of the Commission’s strategy, as set out in the Equality and Diversity Scheme and the three equalities schemes.

Diversity and user focus regional service lead
Our regions are responsible for delivering our work with local public service organisations. Each region has at least one diversity and user focus regional service lead. Their role is to ensure that equality, diversity and human rights are integrated into the Commission’s external facing work. This involves working with:

- regional management teams through the regional diversity champions to build capacity and practice;
- operational staff to improve audit and inspection methodologies and assessment; and
- local services and other agencies to help improve diversity and equality in service delivery.

Diversity and equality representatives
Each of the regions and the central directorates has diversity and equality representatives. They meet together on a quarterly basis to share learning, identify organisation-wide issues around discriminatory practices and take action to address them. The representatives have an internally focused role to:

- positively promote diversity and equality;
- raise understanding of equal opportunities and diversity practice within the organisation; and
• provide advice and assistance to individual members of staff who feel they have been subjected to bullying, harassment or discrimination.

Staff networks
The Commission has five staff networks each of which is sponsored by a member of ACMT:

• The Disability Awareness Raising Team (DART) is the network specifically for disabled employees and membership is open to all. This is important as both the Commission and the network recognise that 70 per cent of disabled people become disabled during their working life. In addition, some members of staff may have caring responsibilities for someone with a disability, while not being disabled themselves. The DART sponsor is Andy McKeon, Managing Director for Health and chair of the DSB.

• The Ethnic Network Relations Group (ENRG) is the network specifically for black and minority ethnic employees. The ENRG sponsor is Martin Evans, Managing Director for Audit Policy and Practice.

• FlexiNET is for employees who work flexibly or part-time. The ACMT sponsor is Jeremy Boss, Acting Managing Director for Corporate Services.

• OUT is the network for gay, lesbian, bisexual and transgender staff and all staff are welcome to join. OUT is sponsored by Tracey Dennison, Managing Director for HR.

• The Christians in the Audit Commission network (CitAC) is for Christian employees and those interested in the Christian faith. CitAC is sponsored by Peter Wilkinson, Managing Director for Policy, Research and Studies. We will consider the need to develop a staff network which looks at faith issues in general or whether more networks for specific religions or beliefs would be appropriate. We will carry out a survey of our staff to identify what is needed and how we can best meet that need.

The role of networks includes:

• facilitating the contributions of members to improving the Commission’s approach to equality and diversity;

• increasing the understanding of equality issues and highlighting these to management;

• promoting equality, cultural understanding, positive attitudes about and good relations between different people both internally and externally; and

• enabling staff to share experiences and support one another to achieve their full potential at the Commission.
4. Involvement and participation
We are committed to involving the public in our work so that we can reflect the experiences of people who use public services. We promote a user-focused approach to public services and have established five core principles for user focus, diversity and human rights that underpin our attitude towards involving the public. They also describe the expectations that we have of ourselves and of the audited and inspected bodies that we work with. They are:

- fairness;
- diversity;
- consent;
- engagement; and
- value for money.

We recognise that our role can significantly impact on the services available to disabled people, black and minority ethnic people, men, women and transgender people, people of different ages, religions or beliefs, or sexuality. We have involved people in our work in a number of ways including:

- designing and delivering training on the RRAA 2000 and the DDA 1995, and the implications for the Commission;
- as tenant inspection advisers in housing inspections;
- undertaking accessibility audits of our premises;
- working with groups of black and minority ethnic people to provide evidence for our study into race equality\(^I\), with groups of disabled children to provide evidence for our study into disabled children’s services\(^\II\), and with groups of older people and disabled people in our series of studies looking at the independence and well-being of older people\(^\III\); and
- working with a network of black and minority ethnic voluntary sector organisations to direct the scope of our work on race equality and to develop recommendations for local public services and the government.

We do not provide direct services – we have a more remote relationship with the public. This has meant that we have had to establish a variety of ways of involving the public to strengthen our capacity to reflect the views of diverse communities.

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Involving people in the development of our Scheme

We have involved people throughout the development of this Scheme in a number of ways which we set out below. The views and experiences of our employees, along with those who access and receive public services, has been an essential factor in establishing the right priorities for our equality action plan. Actively involving people in identifying the barriers they face in working here or in using public services is vital to the effectiveness of our Diversity Scheme. Genuine involvement requires more than simply consulting on an approach and set of actions we have already determined.

We consulted on this Scheme between 27 November 2006 and 23 February 2007. We asked all the local public services we work with, our national external stakeholders and our staff for their views on our proposed actions. We received 43 responses in total: 14 from our staff and 29 from external organisations. The views they expressed have helped us to revise our plans and be more precise about what we are trying to achieve and how. A summary of what people said can be found in Appendix 2.

The DDA 2005 sets out a clear requirement for involving disabled people in the development of our Disability Equality Scheme and in determining our priorities and actions for the next three years. We aim to apply this duty to the other equalities groups and improving how we do this is a key priority for 2006-09.

Our equality and diversity external stakeholder group

We established an external stakeholders group in 2005 to help us to identify what matters to service users and to challenge the effectiveness of our approach to diversity and equality. The external stakeholders group represents the full range of equality strands including national, voluntary and community organisations. Members of this group are well equipped to advise us about the barriers that people face in accessing and using public services, and part of their role is to look at our work from the perspective of people who have direct experience of discrimination and inequality of outcomes. The involvement of the external stakeholders resulted in significant contributions to the development of the Knowing Your Communities toolkit and notable practice site. See Appendix 3 for a list of the members of this group.

An explicit role for this group is to be a critical friend and advise us on the content of our Diversity Scheme, the actions they would like us to undertake, and to challenge us to promote equality more effectively by identifying opportunities for us to make a positive impact.

The external stakeholders told us that they welcomed the opportunity to be involved in the development of our schemes and will participate in an external review of our progress twice a year.
The group will also facilitate our access to focus groups of service users from the different equality groups so that we can have a direct exchange with the public as we deliver our Scheme and develop new areas of work.

**How we involve specific groups of external stakeholders**

Ongoing consideration needs to be given to what ‘involvement’ means and we need regularly to reflect on what is effective for us and for the service users we involve.

As a first step we have developed an approach for involving disabled people in the development of the Disability Equality Scheme. This has focused on engaging with groups who have a good knowledge of what local public services provide and what disabled people want, some of whom are disabled people themselves. We set up a disability reference group (see Appendix 3) consisting of national organisations that reflect the broad categories of disability defined in the DDA 2005:

- cancer, cerebral palsy, diabetes, epilepsy, heart disease and multiple sclerosis;
- mental impairments such as bi-polar disorder (manic depression), dyslexia and schizophrenia;
- sensory impairments such as blindness, partial sight or hearing loss; and
- learning disabilities.

They have contributed to the contents of our Diversity Scheme and disability equality action plan through one-to-one interviews, helping to shape the Scheme and inform the priorities and detailed action plan.

We will further develop this group to ensure it reflects the full range of disability and disabled people themselves. We will also work with the group to identify the most effective mechanisms for involving disabled service users in the further development of our Scheme and our work more broadly.

Disabled people told us about effective ways of involving them. For example:

- briefing disabled people on the work of the Commission so they are better able to make a contribution;
- using disabled consultants to advise on our IT and accessibility;
- convening topic-specific focus groups;
- attending meetings of disabled people to explain and promote our work; and
- using experts by experience to advise us on the impact of our methodologies.

Disability organisations asked that we make efforts to be involved in elements of their work and to consider joint activities or joint statements, which would help to create positive attitudes towards disability and encourage the participation of disabled people in public life. Members of the reference group can offer training to our staff to explain specific disability experiences and comment on the development of new approaches.
We have been asked to ensure that we create sufficient time to involve disabled people; and that we need to acknowledge that there may also be costs involved to facilitate effective involvement. This includes paying people for their time.

Above all, disabled people wanted a genuine and reciprocal involvement to enable them to understand our role more fully and to support us to reflect the experiences and perspectives of disabled people more appropriately.

We will apply what we have learned from this approach to how we connect with people from the other equalities groups. We will set up other reference groups to look specifically at race, gender, age, religion or belief and sexuality equality.

How we involve our staff

All five staff networks have played a key role in developing our approach to the Scheme and determining the specific actions in our Equality and Diversity Scheme and the three equality schemes. The role of the staff networks is to challenge our performance not just as an employer but also as a regulator of public services. All members of the networks are also users of local public services and can provide their views both as employees and service users. Many members also have direct experience of delivering public services through their previous jobs and in their roles as auditors and inspectors. Their views about our external work and the barriers that specific groups of people face in public service delivery are helpful.

Each staff network develops an annual work programme. Priorities are identified based on the experiences of its members and on the results of staff surveys. The chair of each network is also a member of the DSB. Network members, through their chair, identified specific actions for the equality action plan and helped to identify priorities.

Our diversity and equality representatives are also an important source of information about the barriers our employees face. Their casework reveals important and recurring themes which are fed to the Diversity team, the HR Policy and Advice team, and the DSB.

Our regular staff surveys are also important sources of information about what our employees think of us as an employer. We survey the entire workforce every two years. The surveys are carried out by a respected survey organisation, Electoral Reform Services, to ensure confidentiality. There is a high response rate across the Commission – 68.1 per cent in the 2007 survey. The results show that disabled staff and black and minority ethnic staff are more negative than average on some issues and these are key areas for follow-up investigation and management action. We will be working with our disabled employees, our black and minority ethnic employees, DART, and ENRG to explore these concerns and identify actions to address them.
We have used the information from our staff surveys to introduce an ACMT sponsor for each of the staff networks and to encourage each directorate and region to establish direct relationships with each of the staff networks. This information also informed the development of a communications strategy which promotes our approach to diversity and equality.

Priorities for improvement
Our arrangements for involving some of the different groups of public service users in the development of our Equality and Diversity Scheme and the three equalities schemes are well embedded. Over the next three years we will continue to develop our external stakeholder group and the specific reference groups. We will look for opportunities to involve members in the development of other strategies where appropriate.

As we develop CAA over the next two years we will review our approach to involving people from all the equalities groups in our performance assessments. To support this improvement we will also consider the training and development activities necessary to better equip our employees in engaging with service users. We will also work with people from the equalities groups to identify the appropriate support that we provide to enable effective involvement.

At an optimum level we can provide opportunities for people representing the different groups to comment on the work of the Commission, participate in focus groups to test our approaches (for example to CAA) and explore how we might involve people in our assessment work in the future, and to contribute to our studies programme and how it reflects equality.

There will be implications for access, in terms of the information that we make available, and the language and formats that we use; our ICT and our premises. There will also be an impact on the timescales that we set for our work and the financial costs of involving others will need to be factored in.

We see these opportunities as significantly influencing approaches to our work, enabling us to mainstream equality, promote equality of opportunity, create positive attitudes towards different groups throughout our organisation and identify opportunities we have missed in doing so.
5. Using information to manage performance
Evidence gathering and analysis is the core business of the Commission. We gather and interpret evidence on a daily basis to make judgements about the performance of local public services. We believe that gathering and using evidence is intrinsic to understanding and improving performance.

We have systems in place for:

- monitoring and reviewing our performance on equality;
- gathering and using information about us as an employer;
- assessing the performance of local public services on equality; and
- undertaking EIAs.

We will build on and improve these systems over the next three years. Our particular priority is to improve the ways in which we report on and use the information we collect and analyse. This chapter describes how we currently collect and use information to assess our performance, and where we need to improve.

EIAs are a vital tool to help us identify where our policies and programme may have an adverse impact on people from the equalities groups and where there is an opportunity to promote equality and positive views of different people. They are an important way in which we gather and use information to ensure we meet our statutory duties. We have described how we use them and how they are integrated into our decision making in Chapter 6.

Monitoring and managing our performance

The monitoring and management of our equality work is embedded into our existing performance management and business planning systems. The DSB and the Diversity team have a specific role in scrutinising and evaluating the effective delivery of our Equality and Diversity Scheme and the three equalities schemes to ensure that:

- the work is not lost through mainstreaming;
- organisation-wide issues can be identified and tackled;
- outcomes are achieved; and
- consistency of approach is maintained.

This Scheme sets out our corporate equality action plan for the next three years, including the specific actions we will take for age, disability, gender, race, religion or belief, and sexuality. The plan indicates the strategic actions, the directorate responsible for the action, the timescale for delivery, and the expected outcomes.

Directorate and regional diversity and equality action plans

Each directorate and region is responsible for helping to deliver the corporate action plan. Each has their own action plan which sets out how they will deliver the activities assigned to them in the corporate equality action plan and other priorities they have identified specific to their directorate. The plans are developed each year as an integrated part of the Commission’s business planning process.
Directorate and regional action plans also include the policies and programmes to be impact assessed each year and the specific actions to eliminate discrimination and to promote equality and diversity arising from that assessment.

Every directorate and regional business plan includes a statement of progress on equality and the priorities for the coming year, as reflected in the action plan. Both these plans are reviewed and updated quarterly.

**Monitoring progress**

Progress on the delivery of the business plans and the activities which support them is reported monthly to the Programme Management Group (PMG). The PMG includes all members of ACMT and all regional directors. It oversees arrangements, projects and issues which support the delivery of regional and central directorate work programmes.

The progress of each directorate and region’s action plan is also reported to the DSB quarterly and to ACMT every six months. Action is taken by DSB members to challenge progress, support delivery, and to identify and address organisation-wide issues. Individual action plans are updated by the directorates and regions concerned and the corporate action plan is updated by the Diversity team.

All our managers have specific personal objectives for equality and diversity. These are set and reviewed annually as part of the appraisal system. Individual objectives relate to the delivery of the relevant directorate or regional equality and diversity plan.

The Diversity team works closely with the Strategic Planning and Performance team which is responsible for coordinating and quality assuring the business planning process. This ensures that guidance and templates about developing action plans relating to equality are available to directorates and regions as part of the business planning guidance. Business plans are reviewed and challenged before the end of each financial year. Approaches to equality and diversity issues are assessed and reported on to the DSB and business planning leads for each directorate and region and, if necessary, actions are taken to improve.

**Publishing and reporting on the Scheme and our progress**

We will report publicly each year on our progress towards meeting the objectives and priorities of the Scheme. This work will be led by the Diversity team but will draw on evidence and information from all directorates and regions. The report will include:

- steps we have taken under the action plan in the Scheme;
- results of our information gathering for that year, including employee monitoring information and EIAs;
• what use we have made of the information collected and the changes and improvements we have made as a result; and
• actions for the remaining years of the Scheme.

All our published reports are available in a range of formats including audio file, Braille, large print, and languages other than English. They are also available on our external website.

External review of our performance

We are committed to improving our performance on equality and diversity.

An important way for us to review our performance is through independent external review. We look for opportunities to do this on a regular basis.

Independent review of our equality and diversity performance

In 2005 we commissioned an external agency to conduct an independent review of our equality and diversity performance. The review consisted of a baseline inventory of quantitative data, qualitative data provided through a checklist, interviews and workshops, and analysis of data and reporting. The bespoke framework for the review was informed by the Diversity Excellence Model (associated with the European Foundation for Quality Management Model for Business Excellence).

The results showed that our performance was variable across our organisation and that we needed to achieve greater consistency and a clearer focus on outcomes. We have used this information partly to inform the priorities we set out in Chapter 8. We will undertake a further review in 2008 to check our progress and help us to identify new priorities for improvement.

The Disability Standard 2007

The Employers’ Forum Disability Standard 2007 also provides us with an opportunity to review our disability equality performance. The Standard is a management tool that enables organisations to accurately measure their performance on disability, in every way that it affects the business, and put in place action plans that deliver real improvement.

This involves undertaking a survey-based exercise to benchmark our performance, the results of which are validated by the Employers’ Forum on Disability. We will then develop an improvement action plan based on the results of our audit. The actions we identify will also be reflected in an updated corporate disability equality action plan and the relevant directorate and regional action plans. This work is led by the HR Directorate.
Stonewall Workplace Equality Index

The Stonewall Workplace Equality Index identifies the top 100 employers in Britain for lesbian and gay people. It has been determined on an annual basis since 2005. The index involves the completion of a questionnaire which covers nine areas of policy and practice. Measures include having a non-discrimination policy promoted to all staff that includes sexual orientation, advertising in the pink media, supporting a lesbian and gay employee network group, and having an openly gay senior member of staff.

The questionnaire is assessed by Stonewall staff and the top 30 organisations also receive further assessment involving site visits and interviews with staff.

Since the publication of our Scheme for consultation we are pleased to note our ranking is now equal 42nd which is a significant improvement on our joint 91st ranking in 2006. We are still the only inspectorate in the index. We will continue to participate in the Workplace Equality Index, aiming to improve year on year.

Monitoring our employment practice

We have good systems for gathering and interpreting information relating to the recruitment, retention and development of our employees by disability, ethnicity, age and sex and flexible working arrangements. We have recently asked people to record their sexuality and religion or belief. Currently 41 per cent of our staff have recorded this new information and we aim to improve on this year on year.

We use the following categories to monitor ethnicity:

- English;
- Scottish;
- Welsh;
- Irish;
- any other white background;
- white and black Caribbean;
- white and black African;
- white and Asian;
- any other mixed background;
- Indian;
- Pakistani;
- Bangladeshi;
- any other Asian background;
- Caribbean;
- African;
- any other black background;
- Chinese; and
- any other Chinese background.
We were asked through our consultation to add separate monitoring categories for Romany Gypsies and Irish Travellers and encourage local public services to do the same. This is particularly important since Gypsies and travellers are extremely vulnerable members of the community whose needs are often not well understood by local public services. Many services do not recognise that Romany Gypsies and Irish Travellers are specific ethnic groups. We have included this as an action in our equality action plan.

All applicants for Commission jobs are asked to complete an optional equal opportunities form which includes their age, gender, ethnicity, disability, religion or belief and sexuality. We monitor all stages of our external recruitment campaigns. Once a person is appointed, this information is automatically transferred to that individual’s personal electronic file which is part of our people management database ePeople. Information about training and development required or undertaken is also entered onto this system by employees or managers generally and as part of the performance appraisal system. The record includes information about other aspects of employees’ professional roles such as grievances and disciplinary conduct matters and absence.

We also invite staff leaving the organisation to participate in exit interviews asking them a range of questions and inviting comments on why they are leaving.

Recording this information about each employee electronically provides an integrated view of individuals’ training and development, promotions, appraisals, and any disciplinary proceedings. It enables us to analyse our workforce by grade, job family and directorate and to disaggregate the information according to age, gender, ethnicity, disability, religion or belief and sexuality. Looking at our information in this way we can identify where people may be being treated unfairly or being discriminated against.

Employee data is analysed by the HR Service Centre team on a quarterly basis and disaggregated by each equality strand, grade and directorate. The report provides information about recruitment, staff currently in post, applications for and receipt of training, performance assessment procedures, disciplinary procedures, and staff leaving employment.

These reports are reviewed by each directorate and regional management team. The HR management team looks at the results for the organisation as a whole as well as for the HR Directorate. HR managers work with each directorate and region to identify the problems to be addressed and the actions which will solve them. Identification of issues feeds into the priority and target setting for directorate and regional equality and diversity action plans. The DSB identifies issues which need to be reflected in the corporate action plan.
Every six months a strategic report which sets out the key themes emerging from the previous two quarters analysis of employment data is reviewed by ACMT, PMG and the DSB. The agreed actions are then included in the corporate action plan.

**Staff surveys**

The HR Directorate commissions an independent survey of all our employees every two years. This survey includes specific questions about our equality and diversity performance as well as specific equality issues. The results of the survey are disaggregated to identify any differences between the different equality groups. The results are fed back to all staff, and considered in detail by ACMT, all directorate and regional management teams and the DSB.

Each region conducts a specific diversity and equality survey of their staff periodically. This provides information about the performance of the region which is reflected in the equality and diversity objectives set in their business plans. We will introduce specific diversity and equality surveys for our central directorates.

Feedback from our consultation on our overall Equality and Diversity Scheme suggests that future staff surveys (both organisation-wide and individual directorate and regional) need to be more systematic in relating equality and diversity questions to the aims and priorities we set out in our Scheme as well as other related ones.

This will help us to better test perceptions of our performance and the issues and barriers our employees face.

**Gender pay gap and equal pay**

We monitor the percentage of male and female staff and the levels they work at within the Commission to identify any gender inequalities. We recognise that although over 50 per cent of our staff are female, there is not an equally high percentage of women employed in senior positions within our organisation.

We have examined the average pay of all female employees and compared this to the average earnings of male employees and found that women earn less overall than men, by an annual average figure of £8,794. This represents a gender pay gap of 17.4 per cent between men and women in our organisation.

The percentage of women in our top levels of management varies between the different functions of our organisation. Our audit function accounts for 80 per cent of our total workforce. In this area the levels of women in the top two levels of management are significantly lower than their male counterparts, with only 16 and 24 per cent of women represented in these top two tiers.

In our inspection, performance and central directorates the numbers of women employed at the top two senior levels increases to 41 per cent. However, our employment figures also show us that in some areas there is a concentration of women in less well paid administrative functions.
Currently 25 per cent of the top 5 per cent of earners in our organisation are women, this is below the national average for all England, which is 29.82 per cent.

Where we have set targets to improve the numbers of women at a senior grade, we are able to show some success: in our last Diversity Scheme we set ourselves the objective of increasing the number of women who were employed at two of the senior levels of our central functions by 10 per cent. We have exceeded this target with the numbers of women in these grades increasing from 40.7 per cent to 51.2 per cent by March 2007.

However, we are clear that we have a considerable journey to make to address the gender pay gap within our organisation and have set ourselves targets to increase the levels of women employed in senior grades. These are set out in Chapter 8. To increase the levels of women in senior positions we intend to:

- target the promotion of vacancies to attract applications from under-represented groups;
- identify positive action to encourage applications for senior posts;
- target career development training;
- promote mentoring; and
- encourage secondments.

In addition to this we intend to review guidelines for agreeing flexible working and review all methodologies and work practice to ensure that flexible workers are not excluded from workstreams such as CAA.

We undertook an equal pay review in 2002, which did not reveal any inequality of pay between women and men undertaking broadly similar work or work of equal value. However, this is something we intend to review regularly and we will be undertaking another equal pay review in 2007/08.

Case work and anecdotal evidence

The diversity and equality representatives and the HR Policy and Advice team also gather information about the day-to-day issues faced by employees through their casework. This includes examples of harassment, bullying and unfair treatment. They are supported by the Diversity team so that issues requiring a change to policy, practice or behaviour are identified and the necessary action taken by the appropriate part of the organisation.

Evidence from the staff networks

The staff networks have been specifically set up to enable employees from groups that traditionally experience discrimination to voice their areas of concern about the Commission’s equality and diversity performance. They contribute to the development of policies and practices, feeding into consultation. Each network chair is a member of the DSB and is able to raise
concerns in that forum for action and resolution. The networks also have a direct route to ACMT through their sponsor.

How we have used employee data
We have set out two case studies which give an example of the ways in which we use and respond to information about our employees and employment practice.

Example 1
By comparing the results of our staff surveys with our employee monitoring data we identified a potentially significant under-reporting of disability by our employees. About 3 per cent of our employees have recorded that they are disabled. In a survey of regional staff 17 per cent reported that they had a disability. More accurate reporting of disability within our workforce means that our analysis and identification of unfair treatment and possible discrimination is more robust.

This anomaly was identified by DART and communicated to the DSB and Diversity team. We took action to work with colleagues in HR to run a publicity campaign encouraging staff to review their record and update it where appropriate.

We now plan to run more regular campaigns to encourage people to record their disability. DART will also consider talking to their members about the reasons why people might not want to record this information to help us identify potential barriers.

Example 2
An issue was raised by a disabled employee about the consistent way in which they were booked into hotel accommodation which was not accessible. Further investigation by the Diversity team revealed a wider issue about our hotel booking system and, in particular, the third party we use to identify and book our hotel and event accommodation. Action has been taken by the Procurement, Health and Safety, Training, and Events teams to review how we book accommodation and to introduce ways of ensuring all venues we use are accessible. This may include changing our hotel booking supplier.

Monitoring our statutory responsibilities
Our role is to assess the performance of local public services and report to providers of these services and other stakeholders about their strengths and weaknesses, identifying the priority areas for improvement. We do not deliver services directly to the public so we do not collect information about individual service users.

Audit and performance
We have improved the way we collect and analyse information about individual organisations’ approaches to equality and diversity issues and their compliance with the law. This has been done by including specific questions in our different methodologies, which are described in Appendix 1. The results are fed back to individual organisations.
through the audit and inspection reports and the action to be taken is determined by them.

We also review the lessons learned from each round of CPA in a national report. This includes a national assessment of how well councils and fire and rescue authorities are approaching equality and diversity.

We can do more to improve the quality, consistency, specificity and confidence of the judgements we make about equality. Our new performance framework, CAA, also provides us with an opportunity to re-examine the way we assess and report on equality and diversity and community cohesion. We particularly want to improve the judgements we make about how organisations are treating different groups of people and how we could involve service users in our methodologies. This is reflected in our priority objectives and action plan set out in Chapter 8.

We collect and verify BVPI data on an annual basis. There are a number of BVPIs which measure progress towards disability, gender and race equality (Appendix 4). In Equality and diversity 2002 we analysed and reported on what this data told us about the overall equality and diversity performance of local government. We want to make similar use of this information in the future, drawing also on the results of our audit, performance and research work to regularly report on equality issues identified in our work with the local government, fire and rescue and housing sectors. The BVPIs are currently under review. We will seek to undertake a similar analysis of the revised dataset.

In December 2006 the Commission launched the Knowledge Gateway which provides a way for our employees to search for notable practice. The aim is to help the Commission tap into local knowledge and share it across the organisation so that we are better equipped to help local public services improve. Notable practice is collected by our auditors, inspectors and researchers during the course of their work. It involves case studies of good practice and improvement by local public services in key business areas, including equality and diversity. As we improve how local service approaches to equality are assessed we will capture notable practice in this database. Some of these examples are available to external stakeholders in our Knowing Your Communities toolkit.

National studies

Our national studies and other research and analysis work could better reflect equality and diversity issues and help contribute to the knowledge within the public sector about what makes particular approaches effective. We are reviewing our studies methodology to ensure it provides a better framework for assessing both the relevance of equality issues to particular study topics and the opportunities a topic might present for promoting equality and good relations between different groups of people. We are also developing an evaluation system for reviewing the impact and success of individual studies. This will also include a way of determining whether an opportunity to promote equality has been missed and how that might be avoided in the future.
6. Impact assessment
Making equality and diversity a reality

Our EIA process is a system which considers all our current and proposed activities and policies to ensure they do not disadvantage disabled people, black and minority ethnic people, men, women, transgender people and people of different ages, religion or belief, or sexuality. It also identifies where our policies and activities can be more effective in promoting equality of opportunity and positive attitudes to and good relations between different groups and is underpinned by consultation with and involvement of external stakeholders.

The results of our EIAs mean we can make informed adjustments to our policies and activities to ensure that we are promoting equality of opportunity and positive attitudes to and good relations between different groups.

Our existing policy review schedule (Appendix 5) lists our main activities. We are revising this schedule to ensure that all of our main activities are reprioritised and assessed over the next three years and to ensure we meet all of our equality duties. We will involve people from the different equalities groups in agreeing the priorities for the revised policy review schedule.

Our criteria for prioritisation will include identifying those activities which most affect our employees or the public. We will take into consideration the seriousness and extent of potential discrimination, harassment, inequality or opportunity to promote equality and not just focus on the numbers of people potentially affected.

We define a main activity to be any Audit Commission:

- policy or strategy – where it is likely to have a major impact on equality groups – including all organisation-wide strategies, employment policies;
- programme of work (for example, the national studies programme);
- performance assessment framework (for example, CPA, CAA, ALE);
- audit or inspection methodology (for example, key line of enquiry); or
- provision of information service (for example, publications process, internet protocol).

Our revised policy review schedule lists all our main activities which are relevant to our general duties. It will include the criteria by which we have judged an activity to be relevant, when the activity is scheduled to be assessed and by whom.
Our policy review schedule and the results of our EIAs are published on our external website. A summary of all the EIAs we have carried out each year and what action we have taken as a result will be included in our annual progress report.

Our methodology
We have taken a comprehensive approach in assessing our policy and practices. Specifically, EIAs consider:

- if the current or proposed policy or activity will have a negative impact on people from the equalities groups;
- whether we have missed an opportunity to achieve a more positive impact for people from the equalities groups; and
- how we can promote positive attitudes to and good relations between different people.

Advice and guidance about conducting EIAs is held on our intranet. Each EIA must follow the same methodology set out below. We have developed a corporate EIA template which is available on our IT system.

The assessment involves a two-stage process (see Box F). Stage one identifies:

- whether the policy or activity has a major impact in terms of scale or significance for our activities;
- whether the policy or activity, if minor, is likely to have a major impact upon people from the equalities groups; and
- the scale of the impact on individuals regardless of whether this is likely to affect small numbers of people from the equalities groups.

Stage two requires deeper research and evidence gathering, including involving and consulting with under-represented groups to:

- assess the impact of the policy or activity; and
- consider measures which might mitigate the adverse impact or alternative approaches which might better achieve the promotion of equality of opportunity and positive attitudes to and good relations between different groups.

Box F
Equality impact assessment: criteria for judgement

Stage one – initial screening

- What are the aims of the policy or activity?
- Is it a major policy or practice in terms of size and significance for our activities?
- Does the policy, project or activity assist us in meeting our equality duties?
- Will the proposed policy have consequences for local communities or people we employ, partner, contract with?
- Could these consequences differ for different groups?
- Will it promote equality of opportunity, positive attitudes to and good relations between different groups and the public participation of different groups?
• Will there be a negative impact for disabled people, black and minority ethnic people, men, women, transgender people and people of different ages, religion or belief, or sexuality?
• Have existing policies missed opportunities to promote equality of opportunity, positive attitudes to and good relations between different groups and the public participation of different groups?
• Do people from different equalities groups have varying expectations of the policy?
• Is the proposed policy likely to affect either our relations with certain groups or the relationship between different groups?
• Is there any evidence that any part of the proposed policy could discriminate unlawfully, directly or indirectly, against particular groups of people?
• Is there any evidence that information about the policy or activity is not accessible to disabled people, black and minority ethnic people, men, women, transgender people and people of different ages, religion or belief, or sexuality?

Proceed to full screening if the answer is yes to one or more of the above criteria.

Stage two – in-depth assessment
• What evidence is there from stakeholders that different groups might have different needs, concerns, and priorities in relation to issues addressed by the policy or practice (this includes the results of consultation with and involvement of different groups)?
• How does the proposed policy or activity contribute towards meeting our strategic objective to encourage continual improvement in public services so that they meet the changing needs of diverse communities and provide fair access for all?
• How does the policy or practice contribute to our duty to promote positively equality of opportunity and positive attitudes to and good relations between different groups and the public participation of different groups?
• What evidence is there to suggest that the policy or practice could affect disabled people, black and minority ethnic people, men, women, transgender people and people of different ages, religion or belief, or sexuality differently – this is not just about numbers but the seriousness and degree of the adverse impact.
• If there is an adverse impact, what amendments can be made to the policy or practice to mitigate or remove this negative impact?
• Will it help eliminate unlawful discrimination or harassment in any way or encourage or hinder community relations?
• How will we ensure that information about this policy or activity is accessible to disabled people, black and minority ethnic people, men, women, transgender people and people of different ages, religion or belief, or sexuality?
• What are the specific recommendations to amend the policy or practice in the light of the considerations above?
• Who has agreed these recommendations?
• How is it intended to monitor and report on the impact of this proposal?

The review must consider all available data and research. This could include the results of employee or stakeholder surveys, the results of consultation, employment monitoring data, population data, research findings, data collected through monitoring the implementation of the policy or activity and evaluations of projects/programmes, data about the performance of local services.

The review must also state how the policy was assessed, and the details of the methods of involvement of appropriate people, for example, staff networks, external stakeholders and disabled people, black and minority ethnic people, men, women, transgender people and people of different ages, religion or belief, or sexuality.

Following the completion and agreement of the EIAs and proposed recommendations, this must then be published on the Audit Commission’s website.

The results of our EIAs mean we can make informed adjustments to our policies and activities to ensure that we are promoting equality of opportunity and positive attitudes to and good relations between different groups.

Integrating EIAs into our decision-making frameworks

We believe a mainstreaming approach is the most effective way of ensuring ownership of the issues and required actions, and delivering improved performance. As an integral part of the business planning process each central directorate and region is responsible for identifying the main activities to be assessed. These are included in the directorate or regional equality and diversity plans.
The Diversity team maintains a corporate overview through the policy review schedule. This corporate overview is important in enabling us to ensure that all our main activities are assessed every three years and that we monitor our progress effectively.

The actions identified in the EIAs are fed into directorate and regional equality and diversity action plans. It is the responsibility of directorate and regional management teams to make decisions about the actions to be progressed. Action or issues identified by the EIAs which require an organisation-wide response are fed to the DSB via the diversity champions. The DSB makes a recommendation to ACMT about how action will be implemented and monitors its impact.

The role of the Diversity team is to:

- coordinate the policy review schedule, providing advice and guidance to directorates and regions about policy and programmes to be reviewed;
- develop and maintain the EIA methodology and template;
- provide advice, guidance and training on carrying out EIAs, consultation and involvement;
- scrutinise the quality of individual EIAs, challenging findings and actions where necessary; and
- monitor the delivery of the changes identified in the EIAs.

Priorities for improvement

In the first year of this Scheme we will:

- review our current approach to EIAs and revise the guidance and methodology accordingly, this includes guidance on how to involve and consult with disabled people, black and minority ethnic people, men, women, transgender people and people of different ages, religion or belief, or sexuality in the impact assessment;
- develop a training programme and further guidance to support staff in carrying out these assessments, including how to involve and consult with different groups;
- develop a corporate quality assurance process to ensure that EIAs are effective and consistent, leading to good quality policies and products that meet our duties; and
- ensure the DSB regularly reviews the policy review schedule to identify lessons learned from the EIAs. These findings, along with the changes resulting from the assessments will be reflected in the six-monthly equality and diversity progress report to ACMT.
7. Developing our capacity
To effectively eliminate discrimination and promote equality of opportunity we recognise that our employees need the appropriate skills, confidence and resources.

Resources for delivering the equality and diversity action plans are identified by each directorate and region as part of the business planning process. This includes time allocated to the diversity champions, staff networks, diversity and equality representatives and regional service leads. Specific resources for the Diversity team are identified by the DSB and agreed by ACMT. This includes budgeting for involving people in the development of the Scheme. The DSB regularly reviews whether sufficient time and resources have been allocated to people in specific diversity and equality roles.

We currently undertake a range of activities to develop the confidence and expertise of our staff and these will continue over the three years:

- equality and diversity training;
- briefings about each of the equalities legislation and how they impact upon the work of the Commission; and
- the Diversity, Equality, User Focus and Human Rights Knowledge Network.

Training

The training needs of our staff are identified through individual annual learning and development reviews. Diversity champions, together with the relevant directorate or regional management team help to identify equality and diversity training needs for their specific areas. At the end of training events we ask participants to indicate their level of understanding of the topic before the event and to indicate any changes in their levels of understanding and levels of confidence.

In advance of the duties in the DDA 2005 coming into force, 75 per cent of staff attended a disability awareness training day. This training was delivered by disabled people and experts on disability equality. This will become a rolling programme from 2007/08 to ensure that those who missed the original session and all new joiners are fully trained. The specific objectives of the training are to:

- inform staff about their duties as set out in the DDA 2005;
- develop better awareness of the realities of living with a disability and the sorts of barriers and discrimination that disabled people experience;
- equip staff with the confidence and understanding to eliminate discriminatory practices and behaviours, and positively promote disability equality; and
• promote the duty to treat disabled people more favourably and provide guidance about making reasonable adjustments which support disabled staff to carry out their work. This might also include flexible working such as working from home.

Similarly, in advance of the duties in the RRAA 2000 coming into force, staff were invited to attend a training session on the new duties. This will become a rolling programme from 2007/08 to ensure that those who missed the original session and all new joiners are fully trained. The specific objectives of the training are to:

• inform staff about their duties as set out in the RRAA 2000;

• develop better awareness of the experiences of black and minority ethnic people of using public services and the sorts of barriers and discrimination that they face; and

• equip staff with the confidence and understanding to eliminate discriminatory practices and behaviours, and positively promote race equality.

We have trained most staff on Managing Change for Diversity. This is a one-day course designed specifically for the Audit Commission and co-facilitated by our internal trainers and run by a training consultancy specialising in cultural change. The objectives of the training are to:

• build understanding of the impact of negative behaviours and stereotyping;

• explore the different dimensions of inequality and the impact of multiple discrimination; and

• identify the culture and values of the Audit Commission.

Our audit and performance staff working in our regional offices received training on implementing disability and race equality and aspects of equality and diversity into their day jobs. This looked at what equality and diversity meant for their work. It used case studies based on our audit and performance work to explore identifying equality and diversity issues and how these could be addressed through our methodologies.

We integrate equality and diversity into our training for employees carrying out CPA work. It looks at:

• understanding diversity and user focus;

• examples of race and disability inequality and how the legislation works; and

• what to look for in councils’ approaches to equality.

We plan to build on our training so far to respond to the specific needs identified by our employees. This will include:

• a training programme specifically targeted at managers aimed at better equipping them to deal with equality issues as managers of people, and in their external work with local public services;
• three distinct campaigns to raise the awareness of our employees of our responsibilities in relation to age, religion or belief and sexuality and the nature and impact of age, religion or belief and sexuality discrimination and inequality.

• integrating equality issues into existing training for audit and performance staff, particularly in relation to implementing our various audit and performance frameworks and methodologies;

• specific training for those who carry out EIAs, including consultation and involvement policy and practice;

• computer-based training packages covering the different equalities groups; and

• developing an upward mentoring programme based on our award-winning Opportunities Mentoring Programme, where black and minority ethnic, or disabled or female employees mentor senior managers.

Knowledge networks
The Commission has established a number of knowledge networks including one for diversity, equality, user focus and human rights. This is an internal network open to all Commission employees who are interested in or are involved with diversity and equality. It is an important vehicle for gathering, organising, interpreting, and disseminating relevant knowledge. It also:

• acts as a gateway to accessing expertise;

• is a forum for problem solving and developing innovative solutions;

• delivers analytical tools and methodologies which help staff do their job;

• provides a route for developing new lines of work and areas of interest; and

• encourages the development of a culture of learning and cross-directorate working.

Briefings
To supplement this training a continuous programme of briefings is delivered by the Diversity team, diversity and equality representatives, regional service leads and diversity policy leads in housing. The briefings are focused on providing information about the equality duties and how they impact on the work of the Commission. It also provides space for staff to discuss relevant issues.
8. Our priorities and action plan
This chapter identifies where we want to be in 2009 and what we need to do in order to get there. Our priority objectives are based on:

- what our employees and external stakeholders told us we should focus on;
- an independent review of our equality and diversity performance and arrangements for delivery;
- the results of monitoring our performance as an employer;
- what we know about the equality and diversity performance of local public services; and
- the results of our consultation on our single Diversity Scheme.

It then goes on to set out our corporate equality action plan for the next three years. The plan indicates the strategic actions, the directorate responsible for the action, the timescale for delivery, and the expected outcome.

Where we want to be in 2009

We want to significantly improve our approach to equality and diversity over the next three years. We recognise that we have an important leadership role for public services and that we can use our influence more consistently and confidently to encourage local services to improve their approach. At the same time we also need to continue to strengthen our own arrangements for delivery and our approach as an employer.

We set out below the outcomes we are aiming to deliver by 2009. We believe that achieving these will ensure that we meet the general and specific duties of the legislation. Many of these outcomes will contribute to more than one of the general and specific duties.

Our arrangements for delivery

The outcomes we aim to achieve are:

- An improved equality performance across our organisation from the 2006 baseline and a better understanding of the actions that will help us to continue to improve.
- A fit-for-purpose EIA methodology and process.
- A well-managed equality and diversity work programme which is consistent and effectively coordinated across the organisation.
- Effective involvement of people in the development and review of our Diversity Scheme and three equalities schemes and their better participation in public life through involvement in the development of our policies and methodologies.

Employing people

The outcomes we aim to achieve are:

- A more diverse workforce and Commission Board which better reflects the communities we serve, recognising that our workforce is likely to get smaller as we do less work in health (because of changes in the structure of the NHS), so we will have fewer opportunities for employing people outside our organisation.
• The creation of a workplace where all our staff feel valued and are comfortable to be themselves.
• The provision of facilities for prayer and quiet reflection.
• An improved understanding of the profile of our workforce through encouraging more people to report their disability, religion or belief and sexual orientation on their employee record.
• Any unfair treatment or unlawful discrimination of disabled employees, black and minority ethnic employees, men, women, transgender employees and employees of different ages, religion or belief, or sexuality by us as an employer is identified and dealt with.
• Removal of any harassment or bullying of our disabled employees, black and minority ethnic employees, men, women, transgender employees and employees of different ages, religion or belief, or sexuality both by other employees or the external organisations and individuals we work with.
• Removal of any unfair differences in pay.
• A workforce that is confident, knowledgeable and informed about equality and diversity so that they are able to effectively promote equality of opportunity, and eliminate discrimination and harassment in the course of their work.
• All the buildings we own or rent are accessible to disabled people and we have taken steps to ensure the accessibility of those offices we use in buildings owned by local public services.
• Make reasonable adjustments for our disabled employees including the provision of appropriate information and communications technology (ICT) facilities and software to enable them to do their jobs effectively.

Audit, inspection and national studies
The outcomes we aim to achieve are:
• Our new performance assessment framework, CAA, allows us to promote equal opportunities and be more direct about which areas of equality and diversity in local public services need to improve, and we review how successful this has been. This includes specific comment about progress towards and arrangements for age, disability, gender, race, religion or belief and sexuality equality.
• Our approach to equality and diversity in our current audit and inspection work is consistent and explicit, enabling us to identify good practice better and challenge poor performance and non-compliance. This includes revising our current methodologies and making specific comments about progress towards and arrangements for age, disability, gender, race, religion or belief and sexuality equality.
• Our methodologies support judgements on how well public authorities know the different communities they serve and take account of the range of needs in designing, developing and delivering services.
• We provide practical tools and support to local public services to help them improve their approach to equality and to ensure services reflect the needs of the diverse communities they serve. This includes developing our Knowing Your Communities toolkit for housing, community safety and health.

• We influence the development of performance indicators so that they better reflect councils’ performance in equality and we enhance how we audit and verify these performance indicators (see Appendix 4 for the list of current BVPIs relating to disability, gender and race equality).

• We make better use of the information we gather about the performance of local services in equality and diversity to help us and our stakeholders identify where improvement is needed.

• We further develop our Area Profiles work which brings together information about the quality of life and public services in a local area to make it easier to access information about the effect local services have on different equalities groups.

• We have greater knowledge about the experience of service users from the different equalities groups and successful approaches to delivering equality through our national studies. Equality and diversity is integrated into our studies methodology, including identifying situations to promote equal opportunities, and we review how successful this has been.

• Our audit, performance and studies staff are clear about how equality and diversity relates to their job and have the skills and confidence to deliver it. This includes being aware of their legal responsibility to promote equality and the duties under the legislation.

Procuring good services and working with partners
The outcomes we aim to achieve are:

• The audit firms and contractors we work with are clear about the importance of equality and diversity to our work and about how they can help us achieve our aims and meet our needs. If we find that firms and contractors fail to take appropriate action on equality and diversity, we will review our agreements with them.

• We use our purchasing power to influence those we give contracts to.

• Our procurement strategy, Supplier Diversity Statement, procurement processes and standard terms and conditions continue to reflect our commitment to equality and diversity and the legislation, and promote equality.

• Our partners are clear about the importance of equality and diversity to our work and about how they can help us achieve our aims and meet our needs.
Providing information

The outcomes we aim to achieve are:

- A fully accessible external website and intranet which has been independently verified.
- A consistent approach to making all our printed and electronic materials fully accessible.
- A revised policy on translation services with better monitoring of the take-up of translation facilities through our procurement process.
- An improved approach to how we report the results of our audit and performance work relating to equality and diversity to the general public.
- All events we hold are fully accessible to all equality groups and held at venues which are fully accessible to disabled people.

Our priority objectives

We have a clear picture of where we want to be in 2009. We recognise that delivering the outcomes described above is a major challenge and we will need to identify and overcome barriers inside and outside our organisation. Our success depends upon our whole organisation contributing to the delivery of this Scheme and to our three equalities schemes more generally.

To help us understand better the challenges we face we commissioned an independent external agency to review our performance in 2005. It focused on our arrangements for delivering equality and diversity and progress towards achieving the outcomes set out in our first Diversity Scheme. The review identified three priority areas for improvement:

- leadership and communication – taking more action and being more consistent about our approach to equality and diversity;
- managing performance, including the measurement of outcomes; and
- partnerships and contracts.

In the last year we have taken steps to improve our internal arrangements for delivery as described on page 25. This provides us with a strong foundation to move forward coherently and consistently and better equips us to deliver our plans for 2006-09.

In carrying out this work, reviewing the information we collected to develop this Scheme, and talking to our employees and external stakeholders we have identified a set of priority objectives for the next three years. These are set out in Table 1 and relate to both our general and specific duties, and our arrangements for delivery.
### Table 1

<table>
<thead>
<tr>
<th>Priority objective</th>
<th>Why a priority</th>
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<tr>
<td>1  To provide better leadership and consistency of approach ensuring our methodologies enable us to use our influence as a regulator to promote equality of opportunity; eliminate unlawful discrimination and harassment; and promote positive attitudes towards and good relations between different groups.</td>
<td>We know through reviewing the results of our audit, performance and research work that many local organisations need to improve their approach to equality and diversity. This has also shown that we need to be more explicit ourselves in looking at their approaches to meeting the duties set out in equalities legislation.</td>
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<td></td>
<td>Although training is provided, some of our employees have told us that they are unclear about what is expected of them in their day-to-day work.</td>
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<td>Our quality assurance of our audit and performance work suggests some inconsistency of approach and that our public reports do not sufficiently reflect the evidence about equality and diversity that we have found.</td>
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<td></td>
<td>Feedback from our consultation on the general scheme also confirms that consistency of approach through our methodologies is an important area to improve.</td>
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<td></td>
<td>Improving our methodologies and the way we report on the equality and diversity performance of local organisations was a top priority for our external stakeholders.</td>
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<td>This reflects our Management Plan priority to develop effective systems and processes.</td>
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<td>2  Make better use of the information we gather to inform ourselves and our external stakeholders about the performance of local public services in meeting their duties to eliminate unlawful discrimination, promote equality of opportunity and positive attitudes towards and good relations between different groups.</td>
<td>This reflects our Management Plan priority to exploit our knowledge, information and ICT.</td>
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<td></td>
<td>Feedback from our employees and staff networks also supports us making more of the information we collect.</td>
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<td>Priority objective</td>
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<tr>
<td><strong>3</strong> Improve our approach as an employer ensuring we promote equality of opportunity and positive attitudes towards and good relations between different groups; eliminate unlawful discrimination and deal with cases of harassment and bullying promptly and systematically; and consider whether we have missed opportunities to achieve all of the above.</td>
<td>Our employee monitoring data shows that although we are moving in the right direction our workforce does not fully reflect the communities that we serve, particularly at a senior level. Our recent staff survey shows that our disabled and black and minority ethnic staff are less satisfied than average on a number of issues and these are key areas for follow-up investigation and management action. Case evidence from the work of our diversity and equality representatives provides anecdotal evidence of the unfair treatment of black and minority ethnic employees. This reflects our Management Plan priorities to develop future leaders and to plan our workforce and develop our business. Our employment statistics show that while women form the majority of our workforce, they are under-represented at higher levels of the organisation. Our employment statistics show that there is a gender pay gap of 17.2 per cent between the average pay of men and women. There is a higher concentration of women in administrative posts, which are lower paid.</td>
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<td><strong>4</strong> Manage the performance of our equality and diversity work and the delivery of our action plans effectively, including making better use of the information we gather about ourselves and consideration as to whether we have missed opportunities to promote equality and positive attitudes towards and good relations between different groups.</td>
<td>A key finding from our independent review was that we need to better govern and manage our work on equality and diversity. This includes target setting and improved monitoring of performance against those targets. We have already taken several steps to improve this but recognise there is still work to do. Feedback from our consultation identified that we need to define SMART (specific, measurable, achievable, realistic, time-bound) outcomes and measures. DART identified a need for us to have a better understanding of our performance in disability equality across the organisation. They recommended we aim to achieve the Disability Standard 2007.</td>
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<td><strong>5</strong> Develop our capacity so that our employees have the knowledge, skills and confidence to deliver our equality action plan.</td>
<td>Feedback from our consultation reinforces that providing separate training for equality and diversity may not always yield the best results. Taking a holistic approach so that these issues are integrated into existing training was suggested. Evaluation of our diversity and equality training so far revealed that although staff have benefited from the training provided and feel more informed about the implications of equality and diversity for their work, managers in particular still require additional support to manage a diverse workforce.</td>
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<td>Priority objective</td>
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<td>5 Develop our capacity so that our employees have the knowledge, skills and confidence to deliver our equality action plan.</td>
<td>The RRAA 2000 came into force in December 2001, the DDA in December 2006 and the gender duties in April 2007. Although most of our staff have attended our race and disability equality training, some have not. We need to ensure our employees are reminded of their legal responsibilities under the legislation, and are fully briefed on the gender duty and our responsibilities as an employer. This reflects our Management Plan priorities to develop our skills.</td>
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<td>6 Improve how we involve people in monitoring and challenging our equality and diversity performance, in the delivery of our statutory responsibilities and supporting functions.</td>
<td>Feedback from external stakeholders identified many ways in which we could improve how we involve different groups of people in further developing our Equality and Diversity Scheme and in reviewing our progress.</td>
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<td>7 Influence our contractors to help us to meet our general equality duties through our procurement strategy and procedures.</td>
<td>A key finding from our independent review was that we need to make more of the opportunity we have as a procurer of goods and services to promote equal opportunities, positive attitudes towards and good relations between different groups and eliminate discrimination and harassment.</td>
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<td>8 Influence our partners to meet the duties for public bodies and drive up standards in equality and diversity work.</td>
<td>A key finding from our independent review was that we need to make more of the opportunity we have as a partner to ensure that they are meeting the duties for public bodies and promote equal opportunities, positive attitudes towards and good relations between different groups and eliminate discrimination and harassment.</td>
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<td>9 Communicate and report about our progress more consistently and effectively and make sure our information is accessible.</td>
<td>Our independent review identified that we do not communicate our policy, strategy and progress for equality and diversity to our employees as well as we could. It also recommended developing a recognisable structure for communicating about equality and diversity. This reflects our Management Plan priority to improve our communications.</td>
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</table>

Our priority objectives are broad in scope and each will require a number of separate activities to be achieved. These activities will often be the responsibility of more than one directorate or team within the Commission. Our equality action plan on pages 69-85 sets out the detail of how we intend to deliver our priority objectives and how these link to the outcomes we described on pages 61-64 and our general and specific duties.

Each directorate and region also produces their own equality and diversity action plan as part of the annual business planning cycle. These action plans provide the next level of detail for delivery of the Equality and Diversity Scheme, three equalities schemes and associated action plans.
Equality action plan

Our equality action plan sets out the activities we will undertake over the next three years in order to meet our general and specific duties. We have shown in the plan on pages 69-85 which of our general duties each activity is contributed to.

Key to general duties


3. Promote good relations between persons of different racial groups and positive attitudes towards disabled people (DDA 2005, RRAA 2000).


5. Taking positive steps to take account of disabled people’s disabilities, even where that involves treating disabled people more favourably than other people. This means we have to take steps which go beyond treating disabled people and non-disabled people alike (DDA 2005).
### 1. Leadership and consistency

<table>
<thead>
<tr>
<th>Duty</th>
<th>Equality group</th>
<th>Activities</th>
<th>Who is responsible</th>
<th>By when</th>
<th>Outcomes</th>
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</thead>
</table>
| All  | All            | 1.1 Integrating the EIA process into the current methodologies review programme to ensure that each of our current and all new methods have due regard to our equalities duties and help us to identify whether the public bodies we audit and inspect are effectively complying with their equalities duties. This includes reviewing CPA, use of resources, ALE and the relevant key lines of enquiry. This work is part of our Methodologies Review Programme. Individual methods are scheduled for review throughout 2007, 2008 and 2009. | Local Government, Housing and Community Safety Directorate  
Health Directorate  
Audit Policy and Practice Directorate  
Human Resources Directorate  
Policy, Research and Studies Directorate  
Communications and Public Reporting Directorate  
Corporate Services Directorate | 31 March 2009 | Our main activities, processes, quality assurance methods and outcomes will meet our duties. We will fulfil our duties in auditing and inspecting public bodies. Our audit and inspection work will include judgements on how well public bodies are meeting their duties. Our national studies will address the promotion of equality and promote positive attitudes and good relations between different groups. Promotion of good practice in our work with organisations we audit and inspect. |
| All  | All            | 1.2 Review the consistency, coordination and effectiveness of our EIA process, including revising the EIA methodology. | Diversity team | September 2007 | Our policies and functions will be assessed to ensure that we are promoting equality and that missed opportunities or negative impacts will have been identified and responded to and rectified. |
| 1/2/3| All            | 1.3 Revise our quality assurance and challenge processes to ensure that they meet our equalities duties. | Audit Policy and Practice Directorate  
Local Government, Housing and Community Safety Directorate  
Health Directorate | July 2007 | Equality and diversity considerations are addressed consistently and effectively. Promotion of good practice in our work with organisations we audit and inspect. |
### 1. Leadership and consistency

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<th>Duty</th>
<th>Equality group</th>
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<tbody>
<tr>
<td>1/2/3</td>
<td>All</td>
<td>1.4 Ensure equality and diversity is integrated into the CAA framework. This includes:    • risk assessment;   • involving people from the different equalities groups in assessment and the review process; and   • explicit judgements about meeting the needs of disabled people, black and minority ethnic people, men, women, transgender people and people with different religions or beliefs, ages and sexuality, promoting equality of opportunity and positive attitudes and good relations between different groups.</td>
<td>Local Government, Housing and Community Safety Directorate</td>
<td>March 2009</td>
<td>We will assess local services’ performance in equality and diversity more effectively. The needs of black and minority ethnic people and how well public services respond to these and their duties will form part of the Area Risk Appraisal. Our main activities, processes, quality assurance methods and outcomes will meet our duties. We will fulfil our duties in auditing and inspecting public bodies. Our audit and inspection work will include judgements on how well public bodies are meeting their duties. Our national studies will address the promotion of equality and promote positive attitudes and good relations between different groups. Promotion of good practice in our work with organisations we audit and inspect.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>1.5 Review our equal opportunities policy to make sure our policy is up to date and reflects the law and changes we make within our organisation.</td>
<td>Human Resources Directorate: Policy and Advice team</td>
<td>30 September 2007</td>
<td>Ensure that our policies reflect our duty to promote equal opportunity. Promote good relations between different groups and positive attitudes. Identification of missed opportunities to carry out our duties.</td>
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<td>Duty</td>
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<td>1/2/3/4</td>
<td>All</td>
<td>1.8 Improve how we use and verify performance indicators relating to race, disability and gender equality to make judgements about the progress of local public services in delivering equality and diversity.</td>
<td>Local Government Directorate: Performance Information team</td>
<td>March 2008</td>
<td>Information will help in reflecting how far public bodies are meeting their duties and engaging with different groups in the planning and delivery of their services.</td>
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<tr>
<td>All</td>
<td>All</td>
<td>1.9 Publish an annual 'state of the nation' summary report, drawing on the equality performance indicators to make a statement about the progress of local authorities towards delivering equality and diversity.</td>
<td>Local Government Directorate: Performance Information team</td>
<td>Annually</td>
<td>Reporting to the public on how well audited and inspected bodies are delivering services that meet the needs of under-represented groups.</td>
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<tr>
<td>All</td>
<td>All</td>
<td>1.6 Integrate equality and diversity into our studies methodology, the Good Research Guide, to enable us to meet our duties and to ensure that research specifications consider the impact on disabled people, black and minority ethnic people, men, women, transgender people and people with different religions or beliefs, ages and sexuality, promoting equality of opportunity and positive attitudes and good relations between different groups.</td>
<td>Policy, Research and Studies Directorate</td>
<td>March 2008</td>
<td>Our publications will be recognised for promoting diversity and equality. Public organisations will be more aware of diversity and equality. Our research will enable public bodies to address equality and diversity issues more effectively.</td>
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<tr>
<td>All</td>
<td>All</td>
<td>1.7 The studies impact assessment framework incorporates a review of how well the studies have met our equalities duties and identifies any opportunities we have missed to promote equality of opportunity and positive attitudes and good relations between different groups.</td>
<td>Policy, Research and Studies Directorate</td>
<td>March 2008</td>
<td>We will be able to identify and address and improve our studies methodology and more effectively address equality issues.</td>
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<td>1. Leadership and consistency</td>
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<td>3</td>
<td>All</td>
<td>1.10 Make a positive contribution to taking forward the outcomes of the report by the Commission on Integration and Cohesion.</td>
<td>Policy, Research and Studies Directorate Diversity team</td>
<td>December 2008</td>
<td>Our staff and external stakeholders will be clear about the Commission's policy on community cohesion and better able to make consistent judgements about local performance in their work.</td>
</tr>
<tr>
<td></td>
<td>All</td>
<td>1.11 Continue to raise the understanding of the importance of equality and diversity through our regional and directorate management meetings, planning events and team meetings.</td>
<td>Diversity Strategy Board</td>
<td>Ongoing</td>
<td>Leadership is given to raise the profile and understanding of equality and diversity issues by all staff.</td>
</tr>
<tr>
<td></td>
<td>1/2/3 All</td>
<td>1.12 Develop the Knowing Your Communities toolkit for housing, community safety and health. Review the toolkit to ensure it accurately reflects the DDA 2005 and the EA 2006.</td>
<td>Diversity team Local Government, Housing and Community Safety Directorate Health Directorate</td>
<td>December 2007</td>
<td>Local public services are able to self-assess how well they understand the diverse needs of their local communities and improve their performance.</td>
</tr>
<tr>
<td></td>
<td>1/2/3 Race</td>
<td>1.13 Consider developing a set of local indicators on the provision and management of Gypsy and Irish Traveller sites for local councils.</td>
<td>Local Government, Housing and Community Safety Directorate</td>
<td>December 2008</td>
<td>Councils will be better able to benchmark their performance in this area and identify good practice.</td>
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<td>2. Making better use of information</td>
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<tr>
<td>All</td>
<td>All</td>
<td>2.1 Improving the quality and usefulness of our reports on employee monitoring data.</td>
<td>Human Resources Directorate</td>
<td>July 2007</td>
<td>Use information more effectively to identify opportunities and possible discrimination for disabled employees, black and minority ethnic employees, men, women, transgender employees and employees of different ages, religion or belief or sexuality.</td>
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<td>2. Making better use of information</td>
<td>2</td>
<td>All</td>
<td>2.2 Consider adding separate monitoring categories for Romany Gypsies and Irish Travellers with a publicity campaign to explain why.</td>
<td>Human Resources Directorate, ENRG</td>
<td>July 2007</td>
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<tr>
<td></td>
<td>2</td>
<td>All</td>
<td>2.3 Monitoring the volume and nature of incidents of harassment and bullying of disabled employees, black and minority ethnic employees, men, women, transgender people and employees of different ages, religion or belief or sexuality and taking action to address these as instances arise.</td>
<td>Human Resources Directorate</td>
<td>Ongoing on a quarterly basis</td>
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<td></td>
<td>2</td>
<td>All</td>
<td>2.4 Monitoring complaints by equality group.</td>
<td>Chief Executive’s Office: Complaints team</td>
<td>Ongoing on a quarterly basis</td>
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<td>1/2/3/4</td>
<td>All</td>
<td>2.5 Develop a consistent approach to directorate and regional equality and diversity surveys. Develop questions for the next staff survey (2009) to test staff perceptions of our progress.</td>
<td>Human Resources Directorate, Regional management teams</td>
<td>December 2008</td>
</tr>
<tr>
<td>Duty</td>
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<td>1/2/3</td>
<td>Age</td>
<td>2.6 Develop our Area Profiles work which brings together information about the quality of life and public services in a local area to make it easier to access information about the effect local services have on different equalities groups.</td>
<td>Local Government, Housing and Community Safety Directorate</td>
<td>December 2008</td>
<td>We have a better understanding of the quality of life of people from different equalities groups in an area. Our audit and inspection methodologies make better judgements about services received by different groups and the outcomes they experience.</td>
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<td></td>
<td>Gender</td>
<td>2.7 Monitor the average pay of women and men to identify areas where there is a gender gap.</td>
<td>Human Resources Directorate</td>
<td>July 2007 and annually</td>
<td>Use the information to develop training, development programmes and flexible working to positively attract women into higher paid jobs.</td>
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<tr>
<td>3. Employment</td>
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<td>1/2</td>
<td>All</td>
<td>3.1 Increase the numbers of under-represented groups within the organisation by meeting the following targets: • within five years 8% of the workforce at all levels will be people with disabilities; • within five years 50% of senior positions (level 1 and above) will be filled by women; • within five years 10% of people in senior positions (level 1 and above) will be from a black and minority ethnic background. This will be underpinned by local plans and will be achieved through targeted promotion of vacancies, positive action to encourage applications, training, mentoring and secondments.</td>
<td>All directorates and regions</td>
<td>March 2012</td>
<td>The numbers of under-represented groups in senior positions has increased by 2009.</td>
</tr>
<tr>
<td>Duty</td>
<td>Equality group</td>
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<td>3.2 Continue to review our bullying and harassment policies to ensure that we eliminate unlawful discrimination and deal with cases of harassment and bullying promptly and systematically.</td>
<td>Human Resources Directorate and all managers</td>
<td>Ongoing</td>
<td>We effectively address reported harassment and bullying. Staff are confident to report harassment and bullying.</td>
</tr>
<tr>
<td>1/2</td>
<td>All</td>
<td>3.3 Continue to explore flexible working options for all staff. Review guidelines for agreeing flexible working. Review all methodologies and work practice to ensure that flexible workers are not excluded from workstreams such as CAA.</td>
<td>Human Resources Directorate</td>
<td>March 2008</td>
<td>We successfully recruit and retain under-represented groups and those with caring responsibilities. We demonstrate that we positively value our staff.</td>
</tr>
<tr>
<td>1/2/3</td>
<td>All</td>
<td>3.4 Monitor the issues raised by staff with the diversity and equality representatives.</td>
<td>Human Resources Directorate Diversity and equality representatives</td>
<td>Quarterly</td>
<td>We are able to identify barriers and discrimination towards our employees and take action to remove these. Positively valuing all our staff.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>3.5 Develop a consistent approach to targeting recruitment campaigns to increase numbers of applications from under-represented groups.</td>
<td>Human Resources Directorate: Recruitment team</td>
<td>July 2007 and ongoing</td>
<td>All our recruitment campaigns reflect the work we are doing to improve representation within our workforce and effectively target under-represented groups.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>3.6 Review our booking and procurement procedures to ensure that external venues and hotels are fully compliant with the DDA 2005.</td>
<td>Human Resources Directorate: Diversity team Training and Development team Corporate Services Directorate: Procurement team</td>
<td>September 2007</td>
<td>All staff can be confident that their needs will always be catered for when we use external facilities.</td>
</tr>
</tbody>
</table>
### 3. Employment

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<th>Outcomes</th>
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<tbody>
<tr>
<td>2/5</td>
<td>Disability</td>
<td>3.7 Review all offices for staff in external organisations’ premises to ensure that they have made reasonable adjustments to meet the needs of our disabled staff.</td>
<td>Corporate Services Directorate</td>
<td>June 2008</td>
<td>All staff can access our offices which are based in external organisations’ premises.</td>
</tr>
<tr>
<td>2/4/5</td>
<td>Disability</td>
<td>3.8 Continue to assess the support and facilities provided by managers to disabled staff to ensure that managers are making reasonable adjustments to meet current and future staff needs.</td>
<td>Human Resources Directorate: Policy and Advice team</td>
<td>Ongoing</td>
<td>Current and prospective staff can be assured that their needs and changing needs will be met. We will successfully attract disabled people to work in our organisation. We will have a high retention rate of disabled staff.</td>
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<tr>
<td>2/5</td>
<td>Disability</td>
<td>3.9 Review information and communication accessibility standards for hardware systems, documentation and training material. Audit existing hardware, documentation and training materials against those standards and build into web programme design.</td>
<td>Corporate Services Directorate</td>
<td>April 2008</td>
<td>We identify improvements needed to make our ICT systems more accessible and have procedures in place to meet our accessibility standards.</td>
</tr>
<tr>
<td>1/2</td>
<td>Gender</td>
<td>3.10 Carry out an equal pay review</td>
<td>Human Resources Directorate</td>
<td>December 2007</td>
<td>Ensure that all staff are paid equally for work that is broadly similar or of similar value.</td>
</tr>
<tr>
<td>1/2</td>
<td>Age</td>
<td>3.11 Review our length of service benefits to ensure they are not discriminatory.</td>
<td>Human Resources Directorate: Policy and Advice team</td>
<td>March 2008</td>
<td>Benefits which are associated with length of service are not discriminatory.</td>
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### 3. Employment

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<th>Outcomes</th>
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</thead>
</table>
| All  | Disability, Sexuality, Religion or Belief | 3.12 Improve the percentage of our employees who record information about disability, sexuality and religion or belief, or state they would prefer not to disclose to meet the following targets:  
   - 75 per cent of employees have updated their record by March 2008,  
   - 100 per cent by March 2009. | Human Resources Directorate Diversity team | March 2008 March 2009 | Our employees understand why this information is important and how we use it.  
The numbers of people reporting disability, sexuality and religion or belief has increased. |
| 1/2  | Religion or Belief | 3.13 Promote facilities for prayer and quiet reflection and encourage people to make use of them. | Diversity team Corporate Services: Estates and Facilities Management team | December 2007 | Our employees are aware of this facility, know how to access it and use it regularly. |

### 4. Managing our performance

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<th>Outcomes</th>
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</table>
| All  | All            | 4.1 Consolidate existing guidance and support for staff to assist them in setting personal equality and diversity targets.  
   Develop further guidance for managers to assist them in appraising the achievement of these targets. | Human Resources Directorate | December 2007 | Staff understand how they can contribute to our diversity and equality objectives. |
| All  | All            | 4.2 Develop guidance to improve the quality and effectiveness of diversity and equality plans as part of business planning guidance for 2008/09 and 2009/10. | Corporate Services Directorate Diversity team | August 2007 and August 2008 | Regional and directorate equality and diversity plans support the delivery of the corporate equality action plan.  
Regions and directorates are clear about the actions they need to take. |
<table>
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<tr>
<th>Duty</th>
<th>Equality group</th>
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<tr>
<td>All</td>
<td>All</td>
<td>4.3 Consolidate the systems for monitoring the delivery of diversity and equality plans. Review the methods for reporting on this monitoring to the DSB and ACMT. Develop guidance for staff.</td>
<td>Corporate Services Directorate Diversity team</td>
<td>July 2007</td>
<td>Consistent monitoring of our action plans enabling us to take effective and timely action to address implementation issues.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>4.4 Commission an independent review of our equality and diversity performance.</td>
<td>Diversity team</td>
<td>April 2008</td>
<td>External challenge will assist us to identify and take action to improve our performance.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>4.5 Develop a set of key performance indicators to measure our progress towards delivering the outcomes set out in our equality action plan.</td>
<td>Diversity team Corporate Services: Strategic Planning and Performance team</td>
<td>September 2007</td>
<td>We have the systems in place to measure our progress on a regular basis and report this information to our employees and external stakeholders with transparency.</td>
</tr>
<tr>
<td>All</td>
<td>Disability</td>
<td>4.6 Through the application of the Disability Standard, accurately measure our performance on disability in all aspects of our business. From this, update the disability action plan to address any gaps and barriers to improvement.</td>
<td>Human Resources Directorate</td>
<td>December 2007</td>
<td>A disability action plan to remove all identified barriers and improve equality of opportunity for disabled people, and facilitate positive attitudes towards disability.</td>
</tr>
<tr>
<td>1/2/3</td>
<td>Sexuality</td>
<td>4.7 Improve our rating on the Stonewall Workplace Equality Index.</td>
<td>Human Resources Directorate</td>
<td>September 2007</td>
<td>Our approach to employing gay people has improved and this is recognised internally and externally. We are known as an organisation that is positive about gay people. Our gay, lesbian and bisexual staff feel valued by the Commission. Our employees have positive attitudes about gay, lesbian and bisexual people.</td>
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<td>Duty</td>
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<tr>
<td>5. Developing capacity</td>
<td>All</td>
<td>5.1 All staff and managers to identify and set annual equality and diversity objectives, to be monitored through the ePeople database.</td>
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<td></td>
<td>All</td>
<td>5.2 Continue to deliver training programmes to improve the ability of managers to deal with equality issues and deliver this training to all managers.</td>
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<td></td>
<td>All</td>
<td>5.3 Continue to provide guidance and training for auditors and inspectors to equip them to undertake their role in meeting our equality duties and understand public organisations’ duties.</td>
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<tr>
<td>Mainstreaming of carrying out our race equality objectives and duties.</td>
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<tr>
<td>Manpower will be more confident about equality and offer more help to staff in one-to-one sessions and through setting individual aims for staff.</td>
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<tr>
<td>Auditors and inspectors will be able to make informed judgements about the action that audited and inspected bodies are taking to meet their duties. These judgements will be consistently reported on our findings and reports.</td>
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<tr>
<td>Managers – June 2007</td>
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<td>All staff – June 2008</td>
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<tr>
<td>Ongoing</td>
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<tr>
<td>Produce guidance – June 2007</td>
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<tr>
<td>All auditors and inspectors trained by December 2007</td>
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<tr>
<th>Who is responsible</th>
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<tr>
<td>Human Resources Directorate</td>
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<td>Human Resources: Training and Development team</td>
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<tr>
<td>Audit Policy and Practice Directorate</td>
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<tr>
<td>Local Government, Housing and Community Safety Directorate</td>
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<td>Health Directorate</td>
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<tr>
<td>Human Resources Directorate</td>
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### 5. Developing capacity

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<td>All</td>
<td>All</td>
<td>5.4 Deliver ongoing training to all staff so that they understand their role in delivering the Equality and Diversity Scheme and three equalities schemes. Introduce an e-learning programme staff can do using their computers for each area of equality, to improve individual understanding and confidence about equality and diversity.</td>
<td>Human Resources Directorate</td>
<td>October 2007 and ongoing</td>
<td>All staff are clear about how equality and diversity relates to their job and have the confidence and skills to deliver.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>5.5 Establish a continuous programme of briefings on the DDA 2005, RRAA 2000, EA 2006 and our employment duties for sexuality, age and religion or belief, the implications for our work and how we are meeting our duties.</td>
<td>Human Resources Directorate Diversity team and the diversity and equality representatives</td>
<td>Ongoing</td>
<td>Our staff are up to date with the relevant legislation and understand their responsibilities.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>5.6 Provide training for those who carry out EIAs.</td>
<td>Diversity team</td>
<td>September 2008</td>
<td>Staff have the skills and confidence to carry out high-quality and impactful EIAs.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>5.7 Hold a diversity conference for staff to promote good race relations and equality of opportunity.</td>
<td>Staff networks Human Resources Directorate</td>
<td>March 2008</td>
<td>To inform staff, consider areas for further development and to celebrate achievements in developing our equality and diversity objectives.</td>
</tr>
<tr>
<td>All</td>
<td>Disability Race Gender</td>
<td>5.8 Consolidate our Opportunities Mentoring Programme by introducing an ‘upward mentoring’ system, enabling more women, disabled and black and minority ethnic staff to take part in mentoring throughout our organisation.</td>
<td>Human Resources: Training and Development team</td>
<td>1 April 2008</td>
<td>We will support and manage female, disabled and black and minority ethnic staff more effectively. Senior managers will be more aware of staff’s experiences of working in our organisation.</td>
</tr>
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<td>Duty</td>
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<td>By when</td>
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<tr>
<td>5. Developing capacity</td>
<td>All Age</td>
<td>5.9 Develop and run three distinct campaigns to raise the awareness of our employees of our responsibilities in relation to age, religion or belief and sexuality and the nature and impact of age, religion or belief and sexuality discrimination and inequality.</td>
<td>Human Resources: Policy and Advice team, Diversity team, Communications and Public Reporting Directorate</td>
<td>December 2008</td>
<td>Our staff are aware of age, religion or belief and sexuality discrimination and understand their responsibilities. The Commission is known by our employees as an organisation which is positive about people of different ages, religions or beliefs, or sexuality.</td>
</tr>
<tr>
<td>6. Involvement and participation</td>
<td>1/2/3 Religion or Belief</td>
<td>6.1 Consider the need to develop a staff network which looks at faith issues in general or whether more networks for specific religions or beliefs would be appropriate. We will carry out a survey of our staff to identify what is needed and how we can best meet that need.</td>
<td>Diversity team</td>
<td>December 2007</td>
<td>We have had an open debate about the role of staff networks in relation to faith, religion or belief.</td>
</tr>
<tr>
<td></td>
<td>All All</td>
<td>6.2 Work with the Department for Communities and Local Government (CLG) to improve the equality profile of our Commission Board.</td>
<td>Chief Executive’s Office</td>
<td>Ongoing</td>
<td>Our Commission Board better represents the diversity of the English population.</td>
</tr>
<tr>
<td></td>
<td>All All</td>
<td>6.3 Continue to work with all our staff networks to identify the barriers that specific groups of employees experience and solutions to overcome these barriers. Work with our staff networks to address issues raised by specific groups of staff in our employee survey.</td>
<td>Diversity team</td>
<td>Ongoing</td>
<td>We have a clearer understanding of barriers faced by specific groups of our employees. An action plan to address and remove these barriers. Our employees will be more confident in the organisation as an employer.</td>
</tr>
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</table>
### 6. Involvement and participation

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<tr>
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<th>Equality group</th>
<th>Activities</th>
<th>Who is responsible</th>
<th>By when</th>
<th>Outcomes</th>
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<tbody>
<tr>
<td>All</td>
<td>All</td>
<td>6.4 Review how we will involve our staff networks, external stakeholders group and specific reference groups in our EIAs.</td>
<td>Diversity team</td>
<td>December 2007</td>
<td>Our EIAs identify both the adverse and positive impacts of our policies and practices on different groups. We identify the appropriate actions to mitigate adverse impact and promote equality.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>6.5 Through working with our external stakeholders group and our reference groups establish a protocol for accessing the views of service users from the different equalities groups about different aspects of our work, including CAA and studies.</td>
<td>Diversity team</td>
<td>September 2007 and ongoing</td>
<td>Service users from the different equalities groups are more effectively involved in policy development and EIAs.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>6.6 Develop a policy and programme to involve service users from the different equalities groups in the development of our audit and inspection methodologies, and studies work.</td>
<td>Diversity team, Local Government, Housing and Community Safety Directorate, Health Directorate, Audit Policy and Practice Directorate, Policy Research and Studies</td>
<td>December 2007</td>
<td>We have a clear policy for involving service users in developing our audit and inspection methodologies and studies work and the judgements we make about public services are better informed.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>6.7 Meet regularly with our specific reference groups to review our equality and diversity progress and help us to identify further opportunities to promote equality.</td>
<td>Diversity team</td>
<td>June 2007 and ongoing</td>
<td>Give external challenge to the Scheme and its delivery. Involvement in determining future actions. Involvement of people from the different equalities groups in developing future priorities.</td>
</tr>
<tr>
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<tr>
<td>6. Involvement and participation</td>
<td>All</td>
<td>6.8 Develop a training programme to improve the ability of our staff to involve and engage members of the public from the different equalities groups.</td>
<td>Human Resources Directorate</td>
<td>January 2008</td>
<td>Our staff are able to effectively engage with people from the different equalities groups with regard to our work and have positive attitudes about involving people in our work.</td>
</tr>
<tr>
<td>All</td>
<td>Disability</td>
<td>6.9 Determine with disabled people the appropriate support mechanisms they will need to be involved in our work.</td>
<td>Diversity team</td>
<td>April 2007</td>
<td>Disabled people we engage with fully understand the role of the Audit Commission and have the appropriate facilities enabling them to be fully involved.</td>
</tr>
<tr>
<td>7. Procurement</td>
<td>All</td>
<td>7.1 Review the procurement strategy, financial policies and regulations to ensure that they meet our equalities duties. Ensure that our contractors help us to meet our general duties through our procurement strategy and procedures.</td>
<td>Corporate Services Directorate: Procurement team</td>
<td>1 April 2008, an ongoing programme of reviewing contract agreements to 2010</td>
<td>We will be able to ensure through our procurement arrangements that all organisations we contract with meet our equalities duties.</td>
</tr>
<tr>
<td>All</td>
<td>All</td>
<td>7.2 Develop training for all procurement staff to ensure that they know, understand and implement our duties in letting contracts for functions, goods and services.</td>
<td>Human Resources Directorate: Training and Development team Corporate Services Directorate: Procurement team</td>
<td>September 2007</td>
<td>Our staff will have the skills, understanding and confidence they need to ensure that through our procurement arrangements all organisations we contract with meet our equalities duties.</td>
</tr>
<tr>
<td>Duty</td>
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<td>7. Procurement</td>
<td></td>
<td>7.3 Monitor the implementation of the procurement strategy and take action accordingly.</td>
<td>Corporate Services Directorate: Procurement team</td>
<td>November 2007</td>
<td>Ensure that we are meeting our objectives and taking action to address any implementation issues.</td>
</tr>
<tr>
<td>8. Partnerships</td>
<td></td>
<td>8.1 Establish a diversity and equality network group with other regulators to share good practice and learning, and coordinate our approaches.</td>
<td>Diversity team</td>
<td>December 2007</td>
<td>We share learning from our policy and practice. Members of the group think it is a valuable and useful forum for improving their approach.</td>
</tr>
</tbody>
</table>
| All        | All            | 8.2 Review all partnership arrangements and agreements to ensure that these are compliant with our need to meet the duties as a public body, including where these partnerships are with organisations that are not subject to the equalities duties. | Local Government, Housing and Community Safety Directorate  
Health Directorate  
Audit Policy and Practice Directorate  
Human Resources Directorate  
Policy, Research and Studies Directorate  
Communications and Public Reporting Directorate  
Corporate Services Directorate | April 2008 | That we only work in partnerships that are based on an agreed objective to promote equality of opportunity. Promoting achievement of equality of opportunity. |
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<tr>
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<th>Activities</th>
<th>Who is responsible</th>
<th>By when</th>
<th>Outcomes</th>
</tr>
</thead>
</table>
| All        | All            | 9.1 We will publicly report on our progress every year through an annual diversity and equality report. This includes:  
- the steps we have taken under the action plan in the Scheme;  
- the results of our information gathering for that year;  
- what use we have made of the information collected and the changes and improvements we have made as a result; and  
- priority actions for the remaining years of the Scheme. | Audit Commission Management Team         | Annually    | Give a public account of the steps we have taken and intend to take as a public organisation to ensure that we are meeting our duties and promote equality of opportunity. |
| All        | All            | 9.2 Improve the information we publish on our external website and intranet about equality and diversity. This will include publishing our revised policy review schedule, our Equality Impact Assessment, Consultation and Involvement tool and the results of our EIAs. | Communications and Public Reporting Diversity team | June 2007 and ongoing | External and internal stakeholders are able to access information about how our policies and practices impact upon different groups, how we plan to mitigate adverse impact and promote equality.  
External and internal stakeholders are better able to hold us to account. |
| All        | All            | 9.3 Provide better access to our information to make everything that we publish (including inspection and audit reports and national reports) available in a range of formats. | Communications and Public Reporting Directorate | April 2008 | All our publications are accessible to everyone.                                                                                       |
| All        | All            | 9.4 Review our events procedures to ensure that all our internal and external events are fully accessible to all people. | Communications and Public Reporting Directorate | December 2007 | All events we hold are fully accessible to all equalities groups and held at venues which are fully accessible to disabled people. |
Our statutory responsibilities and supporting functions

We set out here the details of how we carry out each of our statutory responsibilities and supporting functions.

Audit

We appoint all external auditors to the individual local public bodies within our remit. Once appointed, auditors carry out their responsibilities and exercise their judgement independently of the Commission. Most of these auditors are employees of the Audit Commission. The rest come from private firms.

Under the Audit Commission Act 1998 (the Act) all the external auditors we appoint are required to carry out their work in accordance with the Code of Audit Practice (the Code). The Code prescribes how auditors carry out their functions and embodies best practice in public audit. It is approved by Parliament every five years and was last approved in 2005.

External auditors in the public sector give an independent opinion on public bodies’ financial statements and may review, and report on, aspects of the arrangements put in place by public bodies to ensure the proper conduct of their financial affairs and to manage their performance and use of resources. The Code sets out the main audit functions as:

- auditing financial statements;
- responsibilities in relation to use of resources; and
- reporting the results of audit work.

To support auditors in carrying out their functions the Commission provides advice and guidance on technical matters and monitors their performance through a rigorous quality review process.

In auditing financial statements auditors must give an opinion about whether they:

- present a fair view of the financial position of the audited body and its income and expenditure for the year; and
- have been properly prepared.

Auditors have a responsibility to satisfy themselves that the audited body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. They do this by using
specific methodologies called use of resources (UoR) in local government and ALE in health.

Both these methodologies focus on financial management but link to the strategic management of the audited body. They look at how financial management is integrated with strategy and corporate management, supports priorities and delivers value for money. They are carried out annually, as part of the audited body’s external audit. They involve auditors making scored judgements on the five key areas of:

- financial reporting;
- financial management;
- financial standing;
- internal control; and
- value for money.

Key lines of enquiry support each theme and include specific questions about equality and diversity. These cover areas such as compliance with the law, community engagement, and how well the needs of diverse communities are reflected in the strategic and financial objectives for the organisation.

In local government for single tier and county councils, the UoR assessment forms part of the CPA framework. For district councils, UoR assessments are carried out annually and inform decisions about possible CPA re-categorisation. In health, ALE informs the Healthcare Commission’s Annual Health Check.

The results of audit work are reported in a range of formats and are addressed directly to the audited body:

- Audit planning documents – setting out how auditors intend to carry out their work in light of their assessment of risks.
- Reports on individual aspects of audit work – reporting the results of, or matters arising from, specific elements of the audit.
- Reports to those charged with governance – covering the full range of auditors’ responsibilities under the Code.
- Audit reports – comprising the auditors’ opinions on the financial statements and arrangements for securing economy, efficiency and effectiveness in UoR.
- Auditor certificates – certifying the completion of audits.
- Annual audit letters – highlighting the key issues arising from the auditors’ work which should be brought to the attention of the audited bodies. The messages in the audit letter need to be communicated both to the audited bodies and key external stakeholders, including members of the general public.
- Reports in the public interest – reports on any matters arising from the audits which auditors consider should be brought to the attention of the audited bodies or the public.
- Recommendations under Section 11(3) of the Act – for local government only, written recommendations to the audited bodies under Section 11(3) of the Act which need to be considered and responded to publicly.
• Referrals to the Secretary of State under Section 19 of the Act – for health only, referral to the Secretary of State of any matter where it is believed that a decision by a body or officer has led to, or would lead to, unlawful expenditure, or that some action by a body or officer has been, or would be, unlawful and likely to cause a loss or deficiency.

• Information to be reported to the Audit Commission in a specified format to enable the Commission to carry out its functions.

Performance
We assess the performance of local services to help them to continually improve. Our remit in performance is radically changing from 2008. We have described here our functions as they currently stand in 2007:

• CPA for local government and fire and rescue services, including inspections of culture, environment and housing services;
• corporate governance inspections (CGIs);
• inspections of housing associations and the Supporting People programme; and
• performance information and data quality through the specification, collection, audit and validation of BVPIs.

CPA
CPA is a framework for assessing the performance of councils and fire and rescue authorities. It draws on a range of information such as performance indicators, assessments of corporate capacity, audit and inspection reports, and stakeholder opinions to reach a single judgement about the performance of a local body. It results in a clear public rating on a local body’s performance and provides the basis for a proportionate and risk-based approach to regulation.

There are three separate frameworks for single tier and county councils, district councils, and fire and rescue authorities. They stand alone except where the outcome of a fire and rescue service assessment of a county and other councils responsible for fire services feeds into their overall CPA category. The frameworks have four common components:

• Corporate assessments – looking at the ability of the local body to lead its local community having clearly identified its needs and set clear ambitions and priorities. For district councils these are carried out only where a council requests it and there has been significant evidence of improvement or deterioration.
• UoR assessments – based on the work done by the local auditor described above.
• Service assessments – either derived from other inspectorates (children and young people, adult social care and benefits) or by the Commission (housing, environment, culture and, where appropriate, fire). We increasingly only use BVPI data to assess environment, housing and cultural services.
Making equality and diversity a reality | Appendix 1

- Direction of travel assessments – the track record of the local body’s achievement of outcomes during the last year and the robustness and delivery of its improvement plans to sustain future improvement.

Each component is supported by a methodology, including key lines of enquiry. CPA will be phased out from 2008 to be replaced by CAA.

Corporate governance inspections
CGIs are carried out very rarely and only where there are serious concerns about a local body’s performance or corporate governance. Concerns about corporate governance may arise at any time. This may be during the course of other audit or inspection work being undertaken by the Commission or as a result of work undertaken by, for example, other inspectorates or regulators. Decisions about whether to carry out a CGI are taken on a case-by-case basis.

Housing
The Housing Inspectorate is part of the Audit Commission and is responsible for inspecting social and strategic housing services in England. This includes local authorities and, since April 2003, housing associations (formally known as registered social landlords). The Inspectorate looks at how well services are delivered to users and how effectively housing organisations operate.

The Inspectorate also has a role in the inspection of arm’s length management organisations (ALMOs). CLG requires a minimum of a two star inspection score prior to the release of additional funds to ALMOs seeking to achieve the Decent Homes Standard for their housing stock by 2010. CLG also requires the Housing Inspectorate to re-inspect all ALMOs to ensure that they have maintained or improved service standards.

In addition, the Inspectorate leads on the programme of Supporting People inspections. The Supporting People programme is a funding regime to support disabled and vulnerable people to live independently in the community through the provision of appropriate support. Supporting People inspections are delivered in partnership with Her Majesty’s Inspectorate of Probation and the Commission for Social Care Inspection and assess the management of Supporting People arrangements by the 150 administering local authorities. This five-year programme of inspections began in 2003 and will finish in 2008.

Each type of inspection is carried out according to published methodologies, set out as the key lines of enquiry. The key lines of enquiry include the two overarching areas of diversity and access which ensure that services are assessed against how effectively the needs of disabled and vulnerable service users are considered and met.
Performance information

The Audit Commission promotes the use of performance information to drive improvement in public services. We have a specific responsibility in relation to BVPIs.

Working closely with CLG we have a role in the specification, collection, audit and validation of BVPIs. Each year, BVPI data is analysed by the Commission and this is made publicly available via our own and the CLG websites. The aim is to enable local public services and service users to benchmark the performance of individual councils. This data is also used in our assessment of performance described above.

We also provide toolkits to support public services in making better use of performance information to improve services. An example of this is the Area Profiles tool available on our website. This is designed to help users paint a rich picture of the quality of life and service provision in a local area. It helps organisations to focus on people and place, and identify priorities that cut across service boundaries. Developing an Area Profile is useful to:

- help local public service providers to identify where improvement is most needed locally;
- make publicly available a summary of data and information on the quality of life and local services; and
- aid government and regulators to concentrate strategically on those areas that most need support.

National studies

Under the Act we have duties to undertake studies designed to enable us to make recommendations to improve the economy, efficiency and effectiveness of certain public bodies and improve the financial or other management of local public bodies. Our national studies aim to improve local public services through their independent authoritative analysis of national evidence and local practice. Our national reports address strategic issues affecting specific sectors as well as the public sector as a whole.

To ensure consistency and high quality each study follows a set methodology laid out in the Good Research Guide. This specifies several stages:

- scoping the research topic;
- specifying the research questions and methodology;
- carrying out the research and analysing the results;
- drafting the report and other products;
- publishing the report and communicating the messages; and
- evaluating the impact.

Employing people

We employ about 2,100 people who work in offices across England. We are committed to valuing people’s differences, treating people fairly and being a good employer. In order to ensure we achieve this we carry out the following functions:

- recruiting;
- training and development;
Making equality and diversity a reality

Appendix 1

- developing and implementing HR policies and advice;
- providing accessible and appropriate facilities and accommodation;
- ensuring the health and safety of our employees and visitors; and
- providing appropriate ICT services and support.

Working with partners

We work closely with many other partners and agencies in the delivery of our statutory responsibilities and supporting functions:

- other regulators – we have a statutory duty to work with the Healthcare Commission, the Commission for Social Care Inspection and the Housing Corporation;
- government departments; and
- national agencies such as the Local Government Association, Improvement and Development Agency, NHS Confederation, and the Association of Police Authorities.

Procuring goods and services

We procure a percentage of our external auditors from commercial audit firms. They are appointed by us as external auditors and are governed by the Code in their work with local public services. Appointed firms help us to deliver our statutory audit responsibilities. Therefore, our procurement process requires that they are able to demonstrate they meet the equalities duties required of public bodies.

We also procure other goods and services from over 1,400 suppliers. This is governed by our procurement strategy and our financial policies. These are designed to ensure that procurement helps us to deliver our statutory responsibilities, meet our statutory equalities duties and achieve our strategic objectives.

Providing information

We publish a range of information about the results of our audit and performance work and national studies, and our policies and work programmes, for example:

- audit reports – we have set out previously the sorts of information we publish in relation to our audit work;
- inspection reports – these set out the strengths and weaknesses of the relevant organisation and recommendations for improvement;
- national studies and other research reports; and
- policy and strategy documents such as the framework for CPA, our audit and inspection methodologies, our strategic plan, this Diversity Scheme.

We use a variety of media and formats to communicate our information:

- external website;
- intranet;
- external newsletters;
- internal newsletters;
- printed material;
- workshops and events; and
- the press.
Summary of consultation results

The consultation closed on 23 February 2007 and we received 43 responses in total:

- 14 from our staff;
- 15 from local public service organisations;
- 8 from voluntary organisations;
- 4 from regional or national agencies; and
- 2 anonymous responses.

Most people who responded agreed that our priorities are clear but that we could improve how we link these to the outcomes we are aiming to achieve. Some thought that our vision could be more ambitious to better reflect the actions we set out in our plan. We could also strengthen our commitment to equality and diversity by making more of our previous success and being more explicit about how we will eliminate discrimination, harassment and promote equality and positive attitudes and good relations towards different groups.

Overall, people said they understood what we were trying to achieve but that we could be clearer about how we would deliver our aims. Some employees felt the Scheme could be more explicit about what was expected of them as individuals. We will also need to be clear that we face the same challenges in delivering this agenda as the organisations we audit and inspect. Transparency and honesty about our progress was felt to be important. Some respondents thought we needed to go into more detail about how we will gather information, carry out impact assessments and monitor the results.

The main area for improvement related to our action plan and outcomes. People said the outcomes we want to achieve could be more specific which would help to make them more measurable. Measuring improvements in attitudes and fairness was thought to be a challenge and that more clearly linking the results of staff surveys to specific outcomes would be helpful. Some actions were thought to be high level and we could specify them more tightly. Some are also applicable for all equalities strands and we need to clearly identify these. Actions which are specific to particular groups could be incorporated into the main plan but clearly identified.

Several ideas for further actions were given. The main priorities were identified as:

- greater consistency from auditors and inspectors through making equality and diversity more explicit in our performance frameworks (including UoR and CAA) and performance indicators;
• more explicit commentary about equality and diversity performance in our audit and inspection reports;

• the identification and sharing of good practice;

• improving the representation of our Commissioners;

• how we will involve people in our work in the future, using the requirement of the DDA 2005 as our minimum standard for all groups;

• strengthen our influence as a procurer of goods and services; and

• promote flexible working.

Further actions were identified for the specific equalities groups:

• Race – we should use Gypsies and travellers as explicit monitoring categories and better address issues of community cohesion.

• Age – we should be clearer about the actions we will take in relation to employment and provide an explicit explanation of the nature of age discrimination in the Scheme.

• Faith – we need to be clearer about the actions we will take generally.

• Sexuality – we should explain how we will improve our Stonewall rating and run a campaign to encourage more reporting of sexuality status by employees and sexuality discrimination.

• Disability – future training should focus on disability equality, not awareness, we need to be clear about how we will improve the involvement of disabled people in our work, and we should be explicit about how we will improve access to buildings and information.

• Gender – we should brief our employees on the new gender duties and update the Knowing Your Communities toolkit so that it refers to these, look at occupational segregation between grades and types of jobs, and carry out regular pay reviews.

People found it difficult to make comments about our plans for training our staff because we had not clearly explained what we currently do in the Scheme. Employees felt any further training needed to focus on the specifics of people’s jobs to help them integrate equality and diversity into their everyday work. This included tailored information about the legal frameworks and duties; embedding equality and diversity into existing training on methodologies, and how to carry out impact assessments. Other ideas emphasised developing opportunities outside of formal training to share learning and ideas, for example, developing a discussion forum on our intranet.

Overall, people were positive about the difference the Scheme will make but emphasised what really matters is delivery. Bringing equality into a single framework provides us with a clear direction. The Scheme clearly demonstrates that we take seriously equality and diversity and this will help to raise the profile both within our organisation and among external agencies. Making clear our intention to improve how we assess performance in this area and challenge local organisations to go beyond compliance reinforces this. Some people felt that the Scheme will help to improve trust and confidence in us as an organisation.
List of external stakeholders

External stakeholders group
Age Concern England
British Youth Council
Employers’ Forum for Age
Employers’ Forum for Disability
Birmingham Race Action Project
Refugee Council
SCOPE
NCVO

Disability reference group
RNIB
RNID
SCOPE
MIND
Carers UK
Age Concern England

Government departments
Better Government for Older People
Department of Health
Communities and Local Government
The equality commissions have been involved in some of the activities of the external stakeholders group and work on an occasional advisory basis.
Equality BVPIs

Disability
- BV16a percentage of disabled employees.
- BV11c top 5 per cent of earners who are disabled.
- BV16b percentage of economically active disabled people in the locality.
- BV156 percentage of council buildings accessible to disabled people.
- BV43a and BV43b statements of special educational need.
- BV53 households receiving intensive home care per 1,000 population aged 65 or over.
- BV56 percentages of equipment and adaptations of equipment delivered and adaptations made within seven working days.
- BV195 acceptable waiting time for care packages for older people.
- BV165 pedestrian crossing with facilities for disabled people.

Gender
- BV 11a percentage of top-paid 5 per cent of local authority staff who are women.
- BV 225 the purpose of this BVPI is to assess the overall provision and effectiveness of local authority services designed to help victims of domestic violence and prevent further domestic violence.
- BV 210 the percentage of women firefighters.

Race
BV2b the quality of an authority’s Race Equality Scheme and the improvements resulting from its application.

BV11b the percentage of the top 5 per cent of local authority staff who are from an ethnic minority.

BV 17a the percentage of local authority employees from ethnic minority communities.

BV17b the percentage of the economically active (persons aged 18-65) population from ethnic minority communities in the local authority area.

BV74b satisfaction of ethnic minority local authority tenants (excluding white minority tenants) with the overall service provided by their landlord.
BV75b satisfaction of ethnic minority council housing tenants (excluding white minority) with their opportunities for participation in management and decision making in relation to housing services provided by their landlord.

BV 164 does the authority follow the Commission for Racial Equality’s code of practice in Rented Housing and the Good Practice Standards for Social Landlords on Tackling Harassment included in Tackling Racial Harassment: Code of Practice for Social Landlords?

BV 174 the number of racial incidents reported to the local authority, and subsequently recorded, per 100,000 population.

BV175 the percentage of racial incidents reported to the local authority that resulted in further action.
Policy review schedule
The table below sets out our main activities for each of our statutory responsibilities and supporting functions.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Responsible directorate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Audit</strong></td>
<td></td>
</tr>
<tr>
<td>Procurement of audit services</td>
<td>Audit Policy and Practice</td>
</tr>
<tr>
<td>Code of Audit Practice</td>
<td>Audit Policy and Practice</td>
</tr>
<tr>
<td>Audit appointments</td>
<td>Audit Policy and Practice</td>
</tr>
<tr>
<td>Technical policies</td>
<td>Audit Policy and Practice</td>
</tr>
<tr>
<td>Complaints policy</td>
<td>Audit Policy and Practice</td>
</tr>
<tr>
<td>Auditors’ Local Evaluation</td>
<td>Health</td>
</tr>
<tr>
<td>Use of resources</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td><strong>Performance</strong></td>
<td></td>
</tr>
<tr>
<td>Corporate governance inspection</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Service inspection methodology</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>CPA – single tier and county councils</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>CPA – districts</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Fire and Rescue CPA/service assessments</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Key lines of enquiry – housing</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Report publication</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Housing service inspection methodology – reality checks</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Recruitment of tenant inspection advisors and affiliates</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Housing market renewal</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Joint inspection methodology</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>– older people</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Joint Area Review methodology</td>
<td>Local Government, Housing and Community Safety</td>
</tr>
<tr>
<td>Activity</td>
<td>Responsible directorate</td>
</tr>
<tr>
<td>-----------------------------------------------</td>
<td>-----------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Studies</strong></td>
<td></td>
</tr>
<tr>
<td>Good Research Guide</td>
<td>Policy, Research and Studies</td>
</tr>
<tr>
<td><strong>Employing people</strong></td>
<td></td>
</tr>
<tr>
<td>Accommodation and facilities services</td>
<td>Corporate Services</td>
</tr>
<tr>
<td>Equal opportunities policies</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Training and development</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Recruitment</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Secondment</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Terms and conditions of employment</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Work/life balance</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Code of Conduct</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Health and safety</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Employee relations</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Car policy</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Relocation</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Pensions scheme</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Flexible benefits</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Leave – maternity/paternity</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Allocation of work</td>
<td>Local Government, Housing and Community Safety and Health</td>
</tr>
<tr>
<td><strong>Working with partners and procuring goods and services</strong></td>
<td></td>
</tr>
<tr>
<td>Procurement Strategy</td>
<td>Corporate Services</td>
</tr>
<tr>
<td>Procurement policies and procedures</td>
<td>Corporate Services</td>
</tr>
<tr>
<td><strong>Providing information</strong></td>
<td></td>
</tr>
<tr>
<td>Report publication</td>
<td>Communications and Public Reporting</td>
</tr>
<tr>
<td>Website protocol</td>
<td>Communications and Public Reporting and Corporate Services</td>
</tr>
<tr>
<td>Events and marketing procedures</td>
<td>Communications and Public Reporting</td>
</tr>
<tr>
<td>Intranet protocol</td>
<td>Communications and Public Reporting and Corporate Services</td>
</tr>
<tr>
<td>Publication processes</td>
<td>Communications and Public Reporting</td>
</tr>
<tr>
<td>ICT policies including the ICT Code of Conduct</td>
<td>Corporate Services</td>
</tr>
<tr>
<td>Freedom of Information Policy</td>
<td>Corporate Services</td>
</tr>
<tr>
<td>Diversity Strategy</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Strategic Plan</td>
<td>Corporate Services</td>
</tr>
</tbody>
</table>
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