



# MALDON DISTRICT COUNCIL

## INTERNAL AUDIT REPORT - FINAL

EQUALITY, DIVERSITY AND INCLUSION  
OCTOBER 2023

IDEAS | PEOPLE | TRUST



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## DISTRIBUTION

<b>Naomi Lucas</b>	Interim Chief Financial Officer
<b>Annette Cardy</b>	Resource Specialist Services Manager
<b>Natasha Brown</b>	HR Business Advisor

BDO LLP APPRECIATES THE TIME PROVIDED BY ALL THE INDIVIDUALS INVOLVED IN THIS REVIEW AND WOULD LIKE TO THANK THEM FOR THEIR ASSISTANCE AND COOPERATION.

## REPORT STATUS

<b>Auditors:</b>	Ellen Fielding, Assistant Manager
<b>Dates work performed:</b>	9 June 2023 - 17 July 2023
<b>Draft report issued:</b>	26 July 2023
<b>Final report issued:</b>	18 October 2023

# EXECUTIVE SUMMARY

CRR REFERENCE: R31



## SCOPE

### BACKGROUND

The public sector Equality Duty came into force on 5 April 2011. The Equality Duty requires Councils to consider how different people will be affected by its activities, helping it to deliver policies and services which are efficient and effective; accessible to all; and which meet different people's needs. The Equality Duty is underpinned by specific duties, set out in regulations which require the Council to produce an annual report detailing relevant, proportionate information demonstrating its compliance with the Equality Duty.

- ▶ Maldon District Council (the Council) published their latest Equality, Diversity and Inclusion annual report in January 2023, which details steps taken with regard to protected characteristics as well as their three objectives:
  - Objective 1 - We will identify the ways to improve our workforce data collection which will be used to inform policy development and workforce strategy.
  - Objective 2: We will provide learning opportunities for our workforce and our Members to develop a wider understanding of our communities and their diverse needs.
  - Objective 3: As officers and Members we will improve our knowledge of, and our contact with, all communities and ensure that communities can continue to be involved in decision making processes.
- ▶ In addition to the mandatory requirements falling under the Equality Duty, there is also the Equality Framework for Local Government (EFLG) which is designed to support Councils by helping them understand how to build equality into processes, identify areas to address to deliver good equality outcomes and enable them to self-assess their progress.
- ▶ This self-assessment includes four improvement modules:
  - Understanding and Working with your Communities
  - Leadership and Organisational Commitment
  - Responsive Services and Customer Care
  - Diverse and Engaged Workforce
- ▶ Under these modules sit a number of themes which, following the self-assessment, an organisation can grade itself as either Developing, Achieving or Excellent. The Council has not yet undertaken a self-assessment but is keen to establish where its strengths lie and where to focus on in order to improve further.

### AREAS REVIEWED

Using the Equality Framework for Local Government we reviewed the four modules and 17 themes that sit under them. We assessed the Council on the

work completed so far against these themes and provided a view as to where we determine, based on the evidence, they would sit for each using the maturity ratings of either Developing, Achieving or Excellent. We then recommended areas to consider making improvements, being the next reasonable steps or way to achieve the next rating. These may be long term goals. This is an advisory report and does not therefore generate an audit opinion.



## CONCLUSION

- ▶ The Council is at the beginning of its journey to incorporate EDI in all aspects of the Council. It is positive to note that there are already good processes being developed to ensure effective community engagement with lots of structures in place to engage with various sectors of the community.
- ▶ The Council promotes the health and well-being of staff via its policies and training opportunities and the Council's political and executive leaders demonstrate personal knowledge and understanding of local communities and continue to show commitment to reducing inequality. Some good action has been taken in relation to gender and disability.
- ▶ However, we found that more analysis could be done on data already collected, such as within the annual Residents Survey and that the Council does not collect and/or analyse data on many of the protected characteristics of its councillors, workforce, and residents.
- ▶ In the following pages we have split the work out into the four separate modules in the framework. In each module, we have a separate section for each of the 17 indicators stating what the Council is doing as well as work underway to progress this area further, areas of good practice found at other Councils and areas for consideration to help achieve the next framework rating.
- ▶ We have rated the Council as "developing" in 14 of the 17 areas and "achieving" in three (fostering good community relations, political and officer leadership and health and wellbeing). This reflects the understanding that the Council is in the early stages of embedding EDI but acknowledges the steps made so far. The Council were already aware of many of the issues identified and are in the process of taking steps to address them such as improved training.
- ▶ Overall, the Council's arrangements are not as developed as those we have seen in unitary Councils but are not out of line with those we have seen in Councils of a similar size and level of resources. We have provided 38 areas to consider. These have not been prioritised and will need to be considered against the resources available, but we suggest that the Council focuses on improving its data and taking action on the results of this.

# RESULTS OF WORK PERFORMED

## Module 1: Understanding and Working With Your Communities

1.1 Collecting and Sharing Information	Rating: Developing
<p>Good Practice:</p> <ul style="list-style-type: none"> <li>The Council's 2023 annual Equality Information Document includes community information such as age, job density and available jobs within the district obtained from the official census and labour market statistics.</li> <li>There is mandatory data protection training via eLearning for all staff on an annual basis.</li> <li>There are comparisons with regional data within the Maldon District Profile report by Essex County Council. This report compares the district to others in the county on areas including gender, age, deprivation, and health factors including the physical environment, clinical care, health behaviours and health outcomes.</li> <li>Although the Council do not systematically obtain data itself, information shared from partners is being captured about health and the social determinants of health including socio-economic deprivation and other inequalities.</li> <li>There is a Community Hub Network where the Council works in partnership with the Maldon and District Community, Voluntary Service and Salvation Army and have launched the Maldon District Food Support Network to support the community in accessing services including food banks and mental health support.</li> <li>The group has undertaken a mapping exercise to highlight the existing provision in the district and to understand where there are gaps in digital related services/help.</li> <li>The Council undertook an access audit which engages with the public to obtain data for specific projects and has highlighted key findings, priorities, and timings.</li> </ul> <p>Work in progress:</p> <ul style="list-style-type: none"> <li>The 2023 annual EDI Report detailing recommendations, key issues, and actions in relation to EDI objectives is being drafted currently and will be reviewed at Council's Leadership team ("CLT") and Executive Leadership Team ("ELT") before it goes to the Performance, Governance and Audit Committee ("PGA"). This has been reported in previous years.</li> </ul> <p>Good Practice Found within other Councils (NB, some examples are for unitary councils but can be applied to districts as appropriate):</p> <ul style="list-style-type: none"> <li>Adult and children's services are using the Power BI Premium platform to visualise data in an easily accessible way. This platform is also being rolled out to other services. A key element of the visualisations is demographics, including protected characteristics such as ethnicity, age, gender, and disability. This allows service activity and outcomes of interventions to be analysed by these categories.</li> <li>Analysis by age, gender, deprivation, and ethnicity is routinely carried out. Analysis by disability and sexual orientation is carried out if the topic is directly relevant eg, learning disability needs assessment or use of a sexual health service. Where analysis is carried out comparisons with national and regional data are routinely made.</li> </ul>	

<p>Areas for Consideration:</p> <ol style="list-style-type: none"><li>1. The Council do not store the data it receives from various partnership organisations such as the ICS or Essex County Council in a central location. The Council could benefit from storing this centrally so that data is easily accessed, shared, and used by departments across the organisation. If stored in Power BI, this data could be used to identify additional trends where useful for projects/project ideas.</li><li>2. The Council obtains data for its area relating to age, gender, and deprivation by Essex County Council. The Council could discuss with Essex County Council and other partners to see if any other protected characteristics such as race or religion is collected and could be shared. The Council could then consider using Power BI to analyse this information. The organisation could work with partners to identify gaps in information and address these.</li><li>3. If not already collected by other organisations, the Council could consider the ways in which it could collect data on other protected characteristics.</li></ol>	<p>Management Response:</p> <p>We collect age, gender, and deprivation statistics in our annual resident survey, and analyse as required for service planning.</p> <p>We have the capabilities and knowledge to do this using power BI in our performance specialist role.</p> <p>Individual managers to take responsibility for reviewing data as part of informing the work they do.</p> <p>Data and insight strategy was adopted by the council in Feb 2023 <a href="#">Appendix B.pdf (maldon.gov.uk)</a> and the action plan work to implement this will highlight EDI data as something staff should be mindful of. Data sharing is a long-term ambition, but the first priority is to map and understand our systems and data to bring everything together. Once primary actions have been completed, we will consider adding data sharing to the action plan. (consideration/discussion to be documented)</p> <p>NOTE: The action will not include replicating data already existing, we will look to link and make good use of data sources</p>	<p>Responsible Officer:</p> <p>Cheryl Hughes</p>	<p>Implementation Date:</p> <p>May 2024</p>
<p>1.2 Analysing and Using Data Information</p>		<p>Rating: Developing</p>	
<p>Good Practice:</p> <ul style="list-style-type: none"><li>• The September 2022 Maldon District Profile from Essex County Council highlighted very low broadband speed in the region and following this analysis, the Council through the Maldon District Digital Inclusion Group worked with residents to connect people with internet access and areas where they can use internet services.</li></ul>			
<p>Good Practice Found Elsewhere:</p>			

<ul style="list-style-type: none"><li>Power BI Premium is used to develop and improve visualisation of data about demographics and the population. This includes internally (eg visualising case management data) and externally (e.g. embedded Power BI dashboard about the demographics of communities).</li></ul>							
<b>Areas for Consideration:</b> <ol style="list-style-type: none"><li>The use (in conjunction with partners) of predictive modelling for demand planning using data already obtained.</li><li>Consider the further integration of equality objectives into planned service outcomes, service design and delivery.</li></ol>		<b>Management Response:</b> <ol style="list-style-type: none"><li>See above - picked up by data and insight strategy. Data modelling is a long-term ambition, but the first priority is to map and understand our systems and data to bring everything together. Once primary actions have been completed, we will consider adding data modelling to the action plan. (consideration/discussion to be documented)</li><li>Committee reports include implications around E&amp;D. EDI impact assessments are required when significantly changing or introducing services or policies.</li></ol>	<table><tr><td><b>Responsible Officer:</b> Cheryl Hughes</td><td><b>Implementation Date:</b> May 2024</td></tr><tr><td>Annette Cardy</td><td>May 2024</td></tr></table>	<b>Responsible Officer:</b> Cheryl Hughes	<b>Implementation Date:</b> May 2024	Annette Cardy	May 2024
<b>Responsible Officer:</b> Cheryl Hughes	<b>Implementation Date:</b> May 2024						
Annette Cardy	May 2024						
<b>1.3 Effective Community Engagement</b>		<b>Rating: Developing</b>					
<b>Good Practice:</b> <ul style="list-style-type: none"><li>The Council’s EDI policy stresses the importance of working with partners and stakeholders to achieve more for the benefit of the community.</li><li>The EDI Policy also states that it will support local communities by ‘Welcoming newer communities to encourage participation in civil life and increase interaction between different community groups’. An example of how the Council have evidenced this commitment is by supporting the development of a Ukraine community support hub. This was an area for the community to congregate and engage in social activities whilst having representatives from the Council and DWP on hand to help enable the community to use services.</li><li>The Equality Impact Assessment (“EIA”) template, necessary for all policies, services, or decisions on the community, includes a section on engagement with the community. We have seen evidence of when the council have consulted with its community/customers/partners, such as for the statement of community involvement, for which it made amendments following some responses and this is all publicised on the website.</li><li>Good engagement noted relating to identification of usage, location and expected future use highlighted in projects such as Maldon District Foodbank Provision and Support.</li><li>We found information from the access audit refers to key decisions to install changing rooms and toilets.</li><li>Engagement structures with various communities are in place. These include:<ul style="list-style-type: none"><li>MDC officers attend and influence the Maldon and District Community Forum. They engage with communities for various projects including taking the Council’s corporate plan for residents to feed into it.</li></ul></li></ul>							

- One Maldon District is hosting LGBTQI+ workshops in 2023 to take steps to becoming visibly more open and supportive to the LGBTQI+ community. There have been three workshops so far and a plan in place to review the implementation from this learning from organisations that attended.
- Maldon District Council is a member of the Essex Faith Covenant. The shared ambition is for Christians, Muslims, Hindus, Jews, Buddhists, Pagans, and leaders from the public sector to pool their resources to strengthen community cohesion and tackle isolation and loneliness.

Work in progress:

- The Council is working towards the ‘becoming a dementia friendly community’ accreditation from Alzheimer’s Society. The Council has developed an action plan setting out how it will increase opportunities for people affected by dementia, including access to local services and the wider community.

Good Practice Found Elsewhere:

- A strategy to involve and engage different community groups, vulnerable and excluded people was developed. Communication materials for specific groups were developed involving and engaging advocates from community and faith groups, traveller communities, and advocates working with homeless people and sex workers. Specific materials for and with people of different ages has also formed part of the communications approach throughout the pandemic and wider.

Areas for Consideration:

1. The Council could create an engagement policy including details on different levels of engagement (i.e., informing, consulting, participating, co-producing), when these are appropriate, who to contact for different communities and how to best contact these communities. This could be linked to the Community Engagement database that is currently in the process of being created.
2. As already identified by the Council, a Community Cohesion Group could be set up to bring together all community leaders and work with them to develop a community action plan.

Management Response:

As an authority we are not responsible from a statutory perspective to lead on certain areas. Instead, we identify who our partners are and what they do to deliver outcomes for our communities. ECC leads on traveller communities for example.

We work with our housing partners to resolve/refer homelessness cases as we not have our own housing stock.

We work with appropriate agencies and the police for vulnerable residents in need of protection, safeguarding and support. All of these functions do not sit in one single area. We have asked that all Service Plans set out who the strategic/delivery partners are.

The strategy team for example has a strategic partners database that sets out

Responsible  
Officer:

Implementation  
Date:



	<p>responsibilities. EDI is not its primary focus however.</p> <p>The Council already have a multiagency community group - One Maldon District. This is our multi-agency partnership board. It is comprised of representatives from the voluntary sector (VCS), education, health, police and housing. They have an agreed action plan that they are all working together on to deliver better safety and health and wellbeing outcomes for residents.</p> <p>We also have a suicide action plan. And we have also achieved 'dementia friendly' status.</p> <p>Our community hub is launching October 2023. This will provide a monthly service from the MDC offices. Each month will be themed and will provide a space for community partners to provide specific help and support to residents. This is an agreed action with the One Maldon District action plan. It will provide help covering a range of topics including access to skills, surviving the winter and cost of living. The first session will host 18 partners and organisations.</p> <p>We also deliver an annual community festival called Ufest. 40 partners attended this year, and many were community groups covering a range of support/referral services for mental health, suicide, dementia.</p> <p>We also run the Parish and Towns engagement forum. This provides updates</p>	Georgina Button	Oct 2023 for Community Hub
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	<p>to our parishes on a range of community topics.</p> <p>These methods of community engagement will be added to the Community Engagement database that is currently in the process of being created to create an engagement policy. This will include different levels of engagement (i.e., informing, consulting, participating, co-producing), when these are appropriate, who to contact for different communities and how to best contact these communities.</p>	Georgina Button	April 2024
1.4 Fostering Good Community Relations		Rating: Achieving	
Good Practice:			
<ul style="list-style-type: none"><li>• The One Maldon District has an aim to ensure that `community is at the heart of what we do by leading on social cohesion, fostering asset-based community development and ensure priorities and outcomes are informed by effective community engagement`.</li><li>• The Council utilises its public facing engagement platforms, including Facebook, Twitter and Instagram, to raise the profile of EDI and community events such as UFest through communication campaigns.</li><li>• The council promotes and becomes involved in celebrations with its communities. For example, the Council flies the Rainbow flag each year to celebrate Essex Pride and also marks the Transgender Day of Remembrance, which honours the memory of those whose lives were lost or who suffered as a result of anti-transgender violence. The Council flies the Transgender Remembrance flag as a sign of respect.</li><li>• The Council works closely with, and commissions work from, a range of organisations representing people from different nationalities and faiths and with different needs, particularly:<ul style="list-style-type: none"><li>▪ StartWell and AgeWell are two key components of the Livewell group which look to reduce health inequalities by ensuring children have the best start in life and that older adults can lead a healthy lifestyle.</li><li>▪ Maldon District Council administers various projects through the Livewell Grant scheme to improve physical health, mental health and combat social and rural isolation and reduce loneliness.</li><li>▪ The Council is a member of the Maldon Youth Strategy group which is a partnership group facilitated by Youth Service Commissioners which relates to improving access to services for 13-19 years olds in the Maldon District.</li><li>▪ Maldon District Council is a member of the Maldon District Dementia Action Alliance (MDDAA) which works collaboratively to build a dementia friendly community.</li><li>▪ Maldon District Council is a member of the Essex Faith Covenant.</li></ul></li><li>• There are monthly Community Scrub Meetings, with partners such as the County Council and Police, which provide updates in relation to community tensions. The Council have a Community Safety Officer and the Council's Safeguarding Policy states that they are the responsible individual to contact in the case of a hate crime. The Council has hate crime ambassadors including the Community Safety Officer.</li></ul>			

<ul style="list-style-type: none"><li>Hate crimes are monitored and analysed regularly. Essex police share reports with the Council analysing hate crime by type, year on year incident numbers, hate type by ward and outcomes as well as analysing the victims by gender, age, and ethnicity.</li></ul>				
Work in progress: <ul style="list-style-type: none"><li>The Council delivered UFest in July 2022, a celebratory event where communities could come together and promote community cohesion. This event is also going ahead in August 2023 and is being worked on now.</li></ul>				
Good Practice Found Elsewhere: <ul style="list-style-type: none"><li>The Council provides leadership to both the multiagency Hate Crime group and the Tension Monitoring group, both of which bring the council, its partners, and communities together to respond swiftly to emerging tensions. The Hate Crime Task and Finish Group includes a wide cross-section of the community, e.g., the police, Jewish community leader, Muslim community leader etc.</li><li>The council has a forward plan which highlights and celebrates all significant religious celebrations and key events in the life of different community groups.</li></ul>				
Areas for Consideration: <ul style="list-style-type: none"><li>1. The Council could consider how to further their feedback loop from communities to capture whether communities feel the right mechanisms are in place for them to feel comfortable sharing the views and participating.</li></ul>		Management Response:  This could be asked as part of wider resident engagement over the 23/24 financial year (eg phone survey, 2024 resident survey)	Responsible Officer:  Eloise Howard	Implementation Date:  Dec 2024
1.5 Participation in Public Life		Rating: Developing		
Good Practice: <ul style="list-style-type: none"><li>Governance meetings are on YouTube and so are transparent and accessible to the public.</li><li>The council actively informs and involves local people, including underrepresented groups, in opportunities for public participation. For example, this has been done via the Ukraine Community Support Hub (for example by explaining and translating documents) and via its extensive range of community engagement structures.</li></ul>				
Good Practice Found Elsewhere: <ul style="list-style-type: none"><li>Communications focused on improving turn out at local elections took into consideration the needs of people with protected characteristics and also focussed on those who might suffer from health inequalities.</li><li>Information about electoral roll registration, postal votes and proxy votes was shared through a community reference group so that they could inform their own communities.</li></ul>				
Areas for Consideration: <ul style="list-style-type: none"><li>1. Ask partner organisations to share any data collected on school governors, councillors, board members of voluntary/statutory sector organisations, and consider the possibility of collecting this data themselves. If not collected elsewhere among partnerships, the Council</li></ul>		Management Response:  New Councillors data will be requested from the next election and the questionnaire will be added to the onboarding pack. It cannot be mandatory and will be dependent on Members wanting	Responsible Officer:  Annette Cardy	Implementation Date:  March 2024

<p>could start by collecting and analysing data (including protected characteristics) of councillors.</p> <p>2. Continue to look into ways to actively inform and involve local people, including under-represented groups, in opportunities for public participation and other engagement. We note that the Council are currently considering utilising a connection with the Mosque that a Councillor is a part of and are in communications with Braintree in relation to a Community Disability Network.</p>	<p>to share data confidentially for statistical use only.</p> <p>Data to be collected from partners will then be part of future plans as resources allow.</p> <p>Opportunities to engage with community groups will be looked at when introducing new laws or service changes. Eg Voter ID advice was targeted at some groups</p>		
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## Module 2: Leadership, Partnership and Organisational Commitment

2.1 Political and Officer Leadership		Rating: Achieving		
Good Practice:				
<ul style="list-style-type: none"><li>There is an EDI Policy which sets out the Council’s vision, objectives, roles and responsibilities.</li><li>The organisation is up to date with language and concepts, for example there has recently been a shift from using ‘Chairman’ and ‘Chairwoman’ and instead to ‘Chair’ or ‘Chairperson’.</li><li>Cabinet and Council decisions are informed by the outcomes of Equality Impact Assessments.</li><li>Senior leaders in the Council are involved in many aspects of EDI. For example:<ul style="list-style-type: none"><li>Senior leaders were consulted on the EDI Policy and have oversight of the annual report on EDI objectives and actions. To a large extent when the EDI policy was agreed this will demonstrate commitment and leadership</li><li>In 2022, the Chair of the Council hosted a Christmas party for Ukrainian children, their families and guests at the Plume Academy.</li><li>Currently there is an EDI Member Sponsor and a corporate leadership team EDI Workforce Sponsor who actively promote the EDI agenda within their areas of work.</li><li>Two Councillors sit in the EDI Working Group beside the three EDI Champions.</li><li>Some councillors undertook optional EDI training in 2022.</li></ul></li></ul>				
Good Practice Found Elsewhere:				
<ul style="list-style-type: none"><li>The Council’s Communities Team has identified a champion for each protected characteristic group.</li><li>The Council have developed a video which tackles some common myths about a range of equalities issues, including Black Lives Matter.</li></ul>				
Areas for Consideration:		Management Response:	Responsible Officer:	Implementation Date:
<ol style="list-style-type: none"><li>The Council could create an Engagement Strategy which could include how organisational leadership (e.g. chair, leader, cabinet members, councillors of the council) should be involved in community engagement.</li><li>Ensure that senior leaders in the organisation regularly communicate the commitment to promoting equality to staff and the community.</li></ol>		Members and Officers are working with the LGA to understand their role in supporting the community including E&D responsibilities	Paul Dodson	March 2024
2.2 Priorities and Partnership Working		Rating: Developing		
Good Practice:				
<ul style="list-style-type: none"><li>There are many examples of the council working in partnership with Community and Voluntary sector organisations to tackle inequality across a range of services. For example, the delivery of a black history month case study, the UFest event, and various LGBT workshops and pride traditions.</li><li>The Council’s Statement of Community Involvement references equality and diversity.</li></ul>				
Good Practice Found Elsewhere:				
<ul style="list-style-type: none"><li>Planning policy actively considers the impacts of developments on health and wellbeing, such as access to services.</li></ul>				

<ul style="list-style-type: none"><li>The Council ensures that they learn from working in partnership, for example a lessons learned report in relation to the Covid-19 response was co-produced with Mutual Aid and Community Response groups</li></ul>			
<b>Areas for Consideration:</b> <ol style="list-style-type: none"><li>As already identified by the Council, all elected members should receive EDI training in the onboarding process.</li><li>The Council, along with its partners could develop a single specific equality vision for the district which all partners recognise and sign up to. The council, its partners and CVS organisations could look to jointly develop a charter on equality.</li></ol>	<b>Management Response:</b> <ol style="list-style-type: none"><li>Members are provided with EDI online training modules each year</li><li>Future work could look at a charter but resources must be made available by central government. Cheryl to review annually whether resources are available for this (review/discussion to be documented).</li></ol>	<b>Responsible Officer:</b> Cheryl Hughes  Cheryl Hughes	<b>Implementation Date:</b> Feb 2024  Feb 2024
<b>2.3 Using Equality Impact Assessment</b>		<b>Rating: Developing</b>	
<b>Good Practice:</b> <ul style="list-style-type: none"><li>An equality impact assessment (“EIA”) is carried out to assess the impact of a policy, service or decision on the community and particularly on the protected characteristics. The assessments also check that the Council is continuing to meet the three aims of the equality duty.</li><li>EIAs are consistent across services and use a standard template that explains each question.</li><li>EIAs clearly outline the importance of engagement and consultation activities.</li></ul>			
<b>Good Practice Found Elsewhere:</b> <ul style="list-style-type: none"><li>There has been a review and updated approach to Equality Impact Assessments, including to provide more guidance and support to staff undertaking EIAs and a renewed emphasis on implementing the findings of EIAs.</li><li>New guidance has been produced and corporate training workshops developed to guide staff through the EIA process.</li></ul>			
<b>Areas for Consideration:</b> <ol style="list-style-type: none"><li>The Council could hold a central list of all EIAs to ensure completeness. The EDI Working Group could then use this list to review all (or a sample of) new EIAs before they are submitted to the relevant group.</li><li>The Council could create a guidance document in the FreshService system for staff to guide them through the EIA including examples and the need to submit the document to the EDI group before submitting to the next appropriate group (if this suggestion is incorporated in the Council).</li></ol>	<b>Management Response:</b> <ol style="list-style-type: none"><li>AD’s provide assistance in completing these as required. A hold a central list of all EIAs will be created and the EDI Working Group will use this list to review a sample of new EIAs.</li><li>The EDI template is now available on a shared drive for all staff to access with other Corporate templates</li></ol>	<b>Responsible Officer:</b> Annette Cardy  Cheryl Hughes	<b>Implementation Date:</b> March 2024  Complete (October 2024)

2.2 Performance Monitoring and Scrutiny		Rating: Developing	
Good Practice: <ul style="list-style-type: none"><li>There is an appropriate and accountable leadership group/board/forum in the form of the EDI Working Group and EDI Champions who have responsibility for the equality agenda.</li><li>Progress and responses are reported regularly to the leadership of the organisation, Officers and Members via the annual equality reports and through the EDI Working Group.</li><li>There is an HR dashboard reported to the Director to monitor performance and drive service improvement with KPIs. A couple are reported in the Corporate Balanced Scorecard each month and reported to CLT and shared with senior managers with narrative and actions required if not meeting target. Additionally, any KPI in the scorecard not regularly tracking to target are reported to PGA. This HR dashboard covers aspects of gender, age and ethnic group.</li></ul>			
Good Practice Found Elsewhere: <ul style="list-style-type: none"><li>The Council reviews itself in terms of equality against similar Councils in an annual exercise.</li></ul>			
Areas for Consideration: <ul style="list-style-type: none"><li>1. The Council could annually assess themselves against the EFLG.</li><li>2. The EDI Working Group could scrutinise all (or a sample of) EIAs.</li></ul>	Management Response:  1.Improvements would be tracked via this action plan and any future audits.  All EIAs are scrutinised at the relevant Committee. The EDI Working Group will review a sample of new EIAs.	Responsible Officer:  N/A  Annette Cardy	Implementation Date:  N/A  March 2024

## Module 3: Responsive Services and Customer Care

3.1 Commissioning and Procuring Services		Rating: Developing	
Good Practice:			
<ul style="list-style-type: none"><li>The Council have an online forum for feedback including a star rating and comment section. A comprehensive monthly report is created which provides a breakdown of the month's total customer star ratings, trends over the last 6 months for all star ratings, analysis of star rating by area, and includes improvement plans for every comment for customers with ratings of one or two stars.</li><li>Guidance is available for suppliers on the equality requirements for the procurement and commissioning process via the Guide To Doing Business With The Council. This document is available on the Council's website and includes reference to the promotion of equality, diversity, social inclusion, fair and ethical trading practices, and equality of opportunity for all people irrespective of sex, age, race, or disability.</li><li>There are standard equality clauses for contracts in the Council's own standard terms and conditions, including reference to the Equality Act 2010 and the Code of Practice issued by the Commission for Equality and Human Rights in employment, stating that the supplier must provide examples if requested.</li></ul>			
Work in progress:			
<ul style="list-style-type: none"><li>The Council is in the process of creating a Social Value Policy. This policy highlights the Council's plan to share (with permission) good practice examples between providers and will promote successes to encourage growth in Social Value across the local supply chain. The Council also plan to enable staff and residents to contribute to the policy and its implementation by suggesting how they can consider Social Value within its own business and through its contracted services. For larger values where appropriate, the Council plan to use relevant areas of the National Themes Outcomes and Measures ("TOMs") Framework for measuring Social Value. The Council also ask about social value in its evaluation criteria already.</li></ul>			
Good Practice Found Elsewhere:			
<ul style="list-style-type: none"><li>There has been intensive work to understand cultural beliefs during Covid where ethnicity has been a factor around vaccination uptake. This has increased some areas of cultural understanding and has been highlighted as shared learning within the contracts team that now feeds into contract management.</li><li>The Council has a Social Value policy which aims to ensure that money invested with its partners, contractors and suppliers contributes to the delivery of its Strategic Plan priorities and Equality objectives.</li><li>As part of the Council's tender evaluation criteria, suppliers are required to provide evidence that they have appropriate equal opportunity policies in place and are committed to implementing them.</li></ul>			
Areas for Consideration:		Management Response:	Responsible Officer:
1. The Council have worked with IT to develop a reporting tool for face-to-face contact, which currently only monitors the number of customers but is being developed to split this by category. However, we note that the Council do not analyse the data collected. If analysed, the Council could monitor trends and act		F2F contacts are very small in number and would not provide a relevant database of customers.	NA
			Implementation Date:
			NA



<p>upon these. Furthermore, the council could consider the possibility of collecting details of customers such as protected characteristics using this method to be able to analyse their customer base and discover further trends.</p> <p>2. Ensure the Social Value Policy is completed, reviewed and approved where appropriate and the Council should engage with staff and residents in the creation of this policy.</p> <p>3. Building monitoring requirements into contracts to ensure equality issues are addressed. These should then be monitored and reported on.</p>	The social value policy and monitoring requirements have been developed and added to the MDC procurement guidance	Debbie White	Complete (October 2024)
3.2 Integration of Equality Objectives into Planned Service Outcomes	Rating: Developing		
<p>Good Practice:</p> <ul style="list-style-type: none"><li>• The Council's Equality and Diversity Policy is published on their website alongside a range of other relevant information. The specific duty to publish equality objectives has been met via this policy.</li><li>• The actions in the annual EDI Report relating to the Council's EDI objectives are SMART (Specific, Measurable, Achievable, Realistic and Time Bound).</li><li>• Members and key decision makers are informed of progress towards the EDI objectives via the annual review of the EDI report with actions and updates.</li></ul>			
<p>Good Practice Found Elsewhere:</p> <ul style="list-style-type: none"><li>• The needs of the Council's communities are constantly reviewed and monitored, via monthly statistics, feedback and forums to ensure the Council are still providing the service required to ensure equality and meet the needs of the Council's diverse communities.</li></ul>			
<p>Areas for Consideration:</p> <p>1. Incorporate EDI further into Service Plans.</p> <p>2. Consider how to monitor outcomes and demonstrate how the Council's actions are leading to improvements.</p> <p>3. Look into the possibility of collecting more data relating to what customers are accessing and establish those who are not accessing certain goods and services and why. This data would require appropriate analysis so that it leads to informing service planning and delivery.</p> <p>4. Ensure the Customer Strategy in development highlights the needs of protected groups and is reviewed and approved appropriately.</p>	<p>Management Response:</p> <p>EDI will be incorporated in Service Plans from 2024 for AD's to consider in their services in how to improve access (consideration/discussion to be documented).</p>	<p>Responsible Officer:</p> <p>Annette Cardy</p>	<p>Implementation Date:</p> <p>March 2024</p>

3.3 Service Delivery and Design		Rating: Developing	
Good Practice: <ul style="list-style-type: none"><li>• The Council collects data about user satisfaction with its services. This includes an online form with a star rating and comments section and an annual business and residents survey. The Council produce, and publicise via their website, a comprehensive annual residents and business survey report with various forms of satisfaction, trends, and actions. This residents survey collects data on the gender identity, age, and ethnicity of the respondents.</li><li>• Data about access to services and user satisfaction is used in equality analyses/equality impacts assessment.</li><li>• The Council’s website links to the Equality and Human Rights Commission’s website and so ensures that Human Rights guidance is available for staff.</li></ul>			
Good Practice Found Elsewhere: <ul style="list-style-type: none"><li>• The Council undertake an annual budget consultation to seek views on priorities for spend and annual consultations with taxi drivers on tariffs/fares.</li><li>• Equalities are accounted for within safeguarding policies, particularly in social services, education, commissioning and non-upper-tier responsibilities like housing and community safety.</li></ul>			
Areas for Consideration: <ul style="list-style-type: none"><li>1. The residents survey results show that the Council collects data on the gender identity, age and ethnicity of the respondents. However, the various satisfaction scores are not then split by these characteristics. This would be a useful analysis exercise.</li><li>2. The organisation could consider how to analyse and measure whether all sections of the community are able to access services. Services could carry out mapping exercises to identify and review current participation and to highlight gaps.</li></ul>	Management Response:  Analysis can be undertaken each year to use the current data to breakdown characteristics against satisfaction and be provided to the AD’s  Where services are changed / ended resident and EDI Impact implications will be considered as the Council reviews all its services as part of the savings review being undertaken.	Responsible Officer:  Eloise Howard  Annette	Implementation Date:  March 2024  March 2024

## Module 4: Diverse and Engaged Workforce

4.1 Workforce Diversity and Inclusion		Rating: Developing		
Good Practice:				
<ul style="list-style-type: none"><li>The 2022 staff survey included two inclusion related questions for which the results were analysed by a working group.</li><li>The Council highlights and celebrates significant religious celebrations and key events in the life of different community groups through its internal communications.</li><li>The Council has begun to identify steps needed to take to achieve a diverse workforce are reflected in recruitment policies and procedures. The Council's Safer Recruitment Policy explains that the Council guarantees an interview to anyone with a disability whose application meets the essential selection criteria for the post. There is an information sheet on 'Employing People with Disabilities' on the job web page which states how to apply for this scheme which also includes interview assistance. This policy also references the promise that the selection will always be carried out without discrimination and includes making reasonable adjustments if needed to enable candidates to participate in the process without disadvantage.</li><li>The Council's Grievance Policy and Procedure states that certain forms of harassment at work will amount to unlawful discrimination. Harassment will amount to discrimination if it relates to a relevant protected characteristic and includes examples of harassment for all protected characteristics.</li><li>The current vacancies section of the Council's website states 'We welcome applications from people of all backgrounds, culture and experience. Applicants will be considered regardless of race, sex, disability, marital status and other protected characteristics.' The Disability Confident Badge is also displayed on the job web page.</li><li>The Council successfully delivered TED Learning actor led training on EDI in 2022 which included identifying the 9 protected characteristics and explaining the different types of discrimination at work, covered by the Equality Act 2010. It also included recognising how unconscious bias can negatively impact an inclusive working environment and how to positively impact organisational culture to promote equality, diversity, and inclusion at work.</li><li>The Council enables flexible working arrangements (as seen in the Flexible Working Policy and Flexible Retirement Policy) and career pathway initiatives which can address potential barriers and under representation.</li></ul>				
Work in progress:				
<ul style="list-style-type: none"><li>An action in the annual EDI report includes engaging with staff using an inclusion survey. The Council is currently assessing the best way to approach this and plan to undertake focus groups following the results.</li><li>The Council have achieved its disability confident level 1 government award and is currently working towards level 2.</li></ul>				
Good Practice Found Elsewhere:				
<ul style="list-style-type: none"><li>Succession plans and recruitment processes address under-representation.</li><li>The Council compare their workforce to national and district data.</li></ul>				
Areas for Consideration:		Management Response:	Responsible Officer:	Implementation Date:
1. As already identified by Council, there should be a 2023 EDI survey (or section of another staff survey) and focus				

<p>groups should be created from results/trends. The Council could look to analyse this survey by protected characteristic in the future.</p> <p>2. The Council could implement succession planning which will provide better data to enable the Council to monitor the progression of protected groups.</p> <p>3. Recruitment and selection could be monitored at all stages of the process by protected characteristics.</p> <p>4. The Council is in the process of creating a Workforce Strategy. The Council should ensure that staff and unions are consulted on this, and that the policy is then reviewed and approved appropriately.</p> <p>5. Specific and measurable employment targets could be set to improve workforce diversity.</p>	<p>The next staff survey will include the same 2 inclusion questions. Data from the next survey will be analysed and any actions agreed by ADs and reported on</p> <p>The Workforce Strategy will include a focus on EDI. This is to be produced by Jane Corsham and approved by Helen Tarling as HR lead</p> <p>Considerations 2, 3 and 5 will be considered in the creation of the Workforce Strategy. (consideration/discussion to be documented).</p>	<p>Eloise Howard</p> <p>Helen Tarling</p> <p>Annette Cardy</p>	<p>March 2024</p> <p>March 2024</p> <p>March 2024</p>
4.2 Inclusive Strategies and Policies	Rating: Developing		
<p>Good Practice:</p> <ul style="list-style-type: none"><li>• Policies and systems are in place to identify, prevent and deal effectively with harassment and bullying at work. Where an employee considers that they have been unlawfully discriminated against, or if they have a complaint involving alleged bullying or harassment, they may use the Council's Grievance Policy to raise the issue. There is a bullying definition and information on what to do if someone is being harassed in the EDI policy.</li><li>• New employment policies and procedures are assessed for their impact on people with protected characteristics via Equality Impact Assessments.</li><li>• The inclusion questions in the 2022 staff survey were followed by an analysis by working group and included a detailed list of actions following the results. One of the completed actions was to deliver neurodiversity training for staff.</li><li>• The Council has an accessibility page on its website detailing how the website is accessible, guidance on how to obtain more accessible formats of information and actions to further improve accessibility.</li><li>• The organisation has a basic set of policies and practices to enhance workforce equality and diversity including but not limited to Grievance, Flexible Working, Flexible Retirement, Menopause, EDI, and Safeguarding.</li><li>• The Council has established an EDI Working Group including the EDI Champions, EDI Member Sponsor and Workforce Sponsor.</li></ul>			
<p>Good Practice Found Elsewhere:</p> <ul style="list-style-type: none"><li>• The equality aspects of the organisation's workforce strategy are being implemented and tracked.</li><li>• There are toolkits and guidance documents provided to help staff and their managers discuss sensitive issues such as race, gender identity and religion.</li></ul>			
Areas for Consideration:	Management Response:	Responsible Officer:	Implementation Date:

1. Consider the need to monitor and analyse harassment and bullying incidents, ensuring appropriate action is taken to address the issues that have been identified.	Incidents of this nature are few in number and any reported will be scrutinised closely for any equality issues and learning.	Helen Tarling	NA
2. Create toolkits and guidance documents to help staff and their managers discuss sensitive issues such as race, gender identity and religion.	EDI Training and E learning is provided to assist staff and managers to understand and adapt behaviours as required,	Helen Tarling	Complete (October 2024)
4.3 Collecting, Analysing and Publishing Workforce Data	Rating: Developing		
Good Practice: <ul style="list-style-type: none"><li>One of the Council's EDI objectives is 'We will identify the ways to improve our workforce data collection which will be used to inform policy development and workforce strategy'.</li><li>The Council's annual Equality Information Document includes data on the workforce including for the first two quarters of 2022/23 and a comparison with 2021/22 on headcount, number of FTE and % of the workforce for female, male and total employees, number of female and male employees split by full time and part time working styles, and number of employees by ethnic group.</li><li>The Council publishes information about Member allowances.</li><li>In the HR Dashboard Reporting Quarterly Report, the Council reports on the workforce by quarter on gender head count, gender FTE, part time and full time split by gender, female and male grade diversity, age and ethnic group.</li></ul>			
Good Practice Found Elsewhere: <ul style="list-style-type: none"><li>Workforce information is published to cover basic legal requirements and includes an analysis of pay/job evaluation outcomes.</li></ul>			
Areas for Consideration: <ul style="list-style-type: none"><li>The progress of protected groups through the organisational hierarchy is monitored and reported on by gender. It could also be looked at by other protected characteristics and this analysis could inform the succession plan and/or employment targets.</li><li>Calculating the gender pay gap even though the Council are not required to report this.</li></ul>	Management Response: The Council will focus on gender for the current year and will then review the need and benefit of introducing other factors. We will investigate measuring the gender pay gap from 2024.25	Responsible Officer: Eloise Howard	Implementation Date: June 2024
4.4 Learning, Development and Progression	Rating: Developing		
Good Practice: <ul style="list-style-type: none"><li>In early 2022, the Council's workforce and Elected Members received EDI training. This insight provided an awareness of language, the importance of behaviours and what it means to have an inclusive culture.</li><li>Councillors have had optional EDI compliance training.</li><li>The Council delivered TED Learning actor-led training on Equality, Inclusion and Diversity to the workforce, and ACAS Equalities training to Elected Members in 2022. The council plan to make this an annual training exercise.</li></ul>			

- Some employees have been trained as mental health first aiders, to recognise signs of mental ill health in colleagues and can offer help and advice. Similarly, some staff have been trained in helping customers and colleagues who are at risk of taking their own lives and can help with suicide prevention.
- The Council provided Dementia Training during 2022/23 for both its Councillors and staff to increase awareness of how dementia can affect people.
- The Council's HR Team have received disability and neurodiversity training and EDI compliance training.
- The Strategy Theme Lead, Community has proposed to HR to undertake the Equality and Diversity UK Training the Trainer Equality and Diversity Course to enable them to deliver EDI training to officers and community organisations in Maldon District. This would provide learning opportunities to the workforce and support communities to improve accessibility and inclusion across the district.
- In December 2022 and March 2023, the Council provided training on neurodiversity, to enable managers and staff to support their colleagues and raise awareness within the workplace. The Council had full attendance with the staff that were nominated to attend.
- The HR Dashboard Reporting Quarterly Report reviews mandatory eLearning compliance including GDPR (75% compliance rate in Q3 2022/23) and EDI (64% compliance rate in Q4 2022/23).
- These various training opportunities and actions in this area are reported on in the annual EDI Report.

Work in progress:

- The Council is a Level 1 Disability Confident Committed employer following several core actions around recruitment, training, retention, consultation, and disability awareness. The Council this year is focusing on working towards achieving Level 2 Disability Confident Employer.
- A Corporate Training Plan is in development and is due to be presented to CLT which will look to take into account equality issues and progression of under-represented groups.

Good Practice Found Elsewhere:

- There is a coherent Health and Wellbeing Strategy that addresses a range of related issues.
- Staff are engaged positively in employment and service transformation and in developing new roles and ways of working.

Areas for Consideration:

1. Improve the Council's appraisal process to include specific equality objectives relevant for the service area. This would also ensure staff are aware of the Council's equality objectives and commitment to EDI.

Management Response:

EDI will be added to the Appraisal template from April 2024

Responsible Officer:

Helen Tarling

Implementation Date:

March 2024

**4.5 Health and Wellbeing**

**Rating: Achieving**

Good Practice:

- Some employees have been trained as mental health first aiders, to recognise signs of mental ill health in colleagues and can offer help and advice. Similarly, some staff have been trained in helping customers and colleagues who are at risk of taking their own lives and can help with suicide prevention.
- In 2022 the Council added two new questions to the staff survey relating to wellbeing. These results were analysed by working group.
- The staff survey includes a question on employee wellbeing support and employee satisfaction, and both increased in terms of average satisfaction from 2020/21 to 2021/22.

- The Council have a comprehensive Grievance Policy to support managers to identify and deal with harassment and bullying at work.
- Occupational health services are provided.
- Regular reports are provided to Managers and CMT to track absence trends and there is also a Managing Attendance policy.
- The Council provide Stress Risk Assessments where necessary to staff.
- The Council's weekly staff communication bulletin 'One Team' includes information, advice, and sessions for various areas such as menopause, mental health and retirement.
- There is a dedicated health and wellbeing section on FreshService detailing events, social activities and support.

Good Practice Found Elsewhere:

- Clear outcomes focussing on wellbeing have been included in the recently revised People Strategy.
- The Council ran an engagement survey asking staff what can be done to better support health and wellbeing within the organisation. More than 1,000 staff responded giving valuable insight to current wellbeing across the organisation. A review of results and an action plan has been published on the intranet and circulated to staff via email.

Areas for Consideration:

1. Ensure that staff in protected groups have opportunities to inform considerations such as priorities, including engagement with staff for the Workforce Strategy.

Management Response:

All Staff will be asked whether a 'Staff Forum Group' is wanted and that if formed will be consulted in considering staff strategies.

Responsible Officer:

Eloise Howard

Implementation Date:

March 2024

## APPENDIX I: TABLE OF AREAS TO CONSIDER

Module	Indicator	Page Reference in Audit Report	Areas to Consider
1. Understanding and Working with Your Communities	Collecting and sharing information	4	<ol style="list-style-type: none"> <li>1. The Council do not store the data it receives from various partnership organisations such as the ICS or Essex County Council in a central location. The Council could benefit from storing this centrally so that data is easily accessed, shared and used by departments across the organisation. If stored in Power BI, this data could be used to identify additional trends where useful for projects/project ideas.</li> <li>2. The Council obtains data for its area relating to age, gender and deprivation by Essex County Council. The Council could discuss with Essex County Council and other partners to see if any other protected characteristics such as race or religion is collected and could be shared. The Council could then consider using Power BI to analyse this information. The organisation could work with partners to identify gaps in information and address these.</li> <li>3. If not already collected by other organisations, the council could consider the ways in which it could collect data on other protected characteristics.</li> </ol>
	Analysing and using data information	5	<ol style="list-style-type: none"> <li>1. The use (in conjunction with partners) of predictive modelling for demand planning using data already obtained.</li> <li>2. Consider the further integration of equality objectives into planned service outcomes, service design and delivery.</li> </ol>
	Effective community engagement	5	<ol style="list-style-type: none"> <li>1. The Council could create an engagement policy including details on different levels of engagement (i.e., informing, consulting, participating, co-producing), when these are appropriate, who to contact for different communities and how to best contact these communities. This could be linked to the Community Engagement database that is currently in the process of being created.</li> <li>2. As already identified by the Council, a Community Cohesion Group could be set up to bring together all community leaders and work with them to develop community action plan.</li> </ol>



	Fostering good community relations	7	<ol style="list-style-type: none"> <li>1. The Council could consider how to further their feedback loop from communities to capture whether communities feel the right mechanisms are in place for them to feel comfortable sharing the views and participating.</li> </ol>
	Participation in public life	8	<ol style="list-style-type: none"> <li>1. Ask partner organisations to share any data collected on school governors, councillors, board members of voluntary/statutory sector organisations, and consider the possibility of collecting this data themselves. If not collected elsewhere among partnerships, the Council could start by collecting and analysing data (including protected characteristics) of councillors.</li> <li>2. Continue to look into ways to actively inform and involve local people, including under-represented groups, in opportunities for public participation and other engagement. We note that the Council are currently considering utilising a connection with the Mosque that a Councillor is a part of and are in communications with Braintree in relation to a Community Disability Network.</li> </ol>
2. Leadership, Partnership and Organisational Commitment	Political and officer leadership	9	<ol style="list-style-type: none"> <li>1. The Council could create an Engagement Strategy which could include how organisational leadership (e.g. chairman, leader, cabinet members, councillors of the council) should be involved in community engagement</li> <li>2. Ensure that senior leaders in the organisation regularly communicate the commitment to promoting equality to staff and the community.</li> </ol>
	Priorities and partnership working	10	<ol style="list-style-type: none"> <li>1. As already identified by the council, all elected members should get EDI training in the onboarding process.</li> <li>2. The Council, along with its partners could develop a single specific equality vision for the city which all partners recognise and sign up to. The council, its partners and CVS organisations could look to jointly develop a charter on equality. Cohesive monitoring</li> </ol>
	Using equality impact assessment	10	<ol style="list-style-type: none"> <li>1. The Council could hold a central list of all EIAs to ensure completeness. The EDI Working Group could then use this list to review all (or a sample of) new EIAs before they are submitted to the relevant group.</li> <li>2. The Council could create a guidance document in the FreshService system for staff to guide them through the EIA including examples and the need to submit the document to the EDI group before submitting to the next appropriate group (if this suggestion is incorporated in the Council).</li> </ol>

	Performance monitoring and scrutiny	11	<ol style="list-style-type: none"> <li>1. The Council could annually assess themselves against the EFLG.</li> <li>2. The EDI Working Group could scrutinise all (or a sample of) EIAs.</li> </ol>
3. Responsive Services and Customer Care	Commissioning and procuring services	12	<ol style="list-style-type: none"> <li>1. The Council have worked with IT to develop reporting tool for face to face contact, which currently only monitors the number of customers but is being developed to split this by category. However, we note that the Council do not analyse the data collected. If analysed, the Council could monitor trends and act upon these. Furthermore, the council could consider the possibility of collecting details of customers such as protected characteristics using this method to be able to analyse their customer base and discover further trends.</li> <li>2. Ensure the Social Value Policy is completed, reviewed and approved where appropriate and the Council should engage with staff and residents in the creation of this policy.</li> <li>3. Building monitoring requirements into contracts to ensure equality issues are addressed. These should then be and reported on.</li> </ol>
	Integration of equality objectives into planned service outcomes	13	<ol style="list-style-type: none"> <li>1. Incorporate EDI further into Service Plans.</li> <li>2. Consider how to monitor outcomes and can demonstrate how the Councils actions are leading to improvements.</li> <li>3. Look into the possibility to collect more data relating to what customers are they accessing and establish those who are not accessing certain goods and services and why. This data would require appropriate analysis so that it leads to informing service planning and delivery.</li> <li>4. Ensure the Customer Strategy in development highlights the needs of protected groups and is reviewed and approved appropriately.</li> </ol>
	Service delivery and design	14	<ol style="list-style-type: none"> <li>1. The residents survey results show that the Council collects data on the gender identity, age and ethnicity of the respondents. However, the various satisfaction scores are not then split by these characteristics. This would be a useful analysis exercise.</li> <li>2. The organisation could consider how to analyse and measure whether all sections of the community are able to access services. Services could carry out mapping exercises to identify and review current participation and to highlight gaps.</li> </ol>
4. Diverse and Engaged Workforce	Workforce diversity and inclusion	15	<ol style="list-style-type: none"> <li>1. As already identified by council, there should be a 2023 EDI survey (or section of another staff survey) and focus groups should be created from results/trends. The Council could look to analyse this survey by protected characteristic in the future.</li> </ol>

			<ol style="list-style-type: none"> <li>2. The Council could implement succession planning which will provide better data to enable the Council to monitor the progression of protected groups.</li> <li>3. Recruitment and selection could be monitored at all stages of the process by protected characteristics.</li> <li>4. The Council is in the process of creating a Workforce Strategy. The Council should ensure that staff and unions are consulted with in the process of this and that the policy is then reviewed and approved appropriately.</li> <li>5. Specific and measurable employment targets could be set to improve workforce diversity.</li> </ol>
	Inclusive strategies and policies	16	<ol style="list-style-type: none"> <li>1. Consider the need to monitor and analyse harassment and bullying incidents, ensuring appropriate action is taken to address the issues that have been identified.</li> <li>2. Create toolkits and guidance documents to help staff and their managers discuss sensitive issues such as race, gender identity and religion.</li> </ol>
	Collecting, analysing and publishing workforce data	17	<ol style="list-style-type: none"> <li>1. The progress of protected groups through the organisational hierarchy is monitored and reported on for the characteristic of gender. It could also be looked at by other protected characteristics and this analysis could inform the succession plan and/or employment targets.</li> <li>2. Calculating the gender pay gap even though the Council are not required to report this.</li> </ol>
	Learning, development and progression	17	<ol style="list-style-type: none"> <li>1. Improve the Councils appraisal process to include specific equality objectives relevant for the service area. This would also ensure staff are aware of the Councils equality objectives and commitment to EDI.</li> </ol>
	Health and wellbeing	18	<ol style="list-style-type: none"> <li>1. Ensure that staff in protected groups have opportunities to inform considerations such as priorities, including engagement with staff for the Workforce Strategy.</li> </ol>

## APPENDIX II - DEFINITIONS

LEVEL OF ASSURANCE	DESIGN OF INTERNAL CONTROL FRAMEWORK		OPERATIONAL CONTROLS	EFFECTIVENESS OF
	FINDINGS FROM REVIEW	DESIGN OPINION	FINDINGS FROM REVIEW	EFFECTIVENESS OPINION
<b>Substantial</b>	Appropriate procedures and controls in place to mitigate the key risks.	There is a sound system of internal control designed to achieve system objectives.	No, or only minor, exceptions found in testing of the procedures and controls.	The controls that are in place are being consistently applied.
<b>Moderate</b>	In the main there are appropriate procedures and controls in place to mitigate the key risks reviewed albeit with some that are not fully effective.	Generally, a sound system of internal control designed to achieve system objectives with some exceptions.	A small number of exceptions found in testing of the procedures and controls.	Evidence of non-compliance with some controls, that may put some of the system objectives at risk.
<b>Limited</b>	A number of significant gaps identified in the procedures and controls in key areas. Where practical, efforts should be made to address in-year.	System of internal controls is weakened with system objectives at risk of not being achieved.	A number of reoccurring exceptions found in testing of the procedures and controls. Where practical, efforts should be made to address in-year.	Non-compliance with key procedures and controls places the system objectives at risk.
<b>No</b>	For all risk areas there are significant gaps in the procedures and controls. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Poor system of internal control.	Due to absence of effective controls and procedures, no reliance can be placed on their operation. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Non-compliance and/or compliance with inadequate controls.

RECOMMENDATION SIGNIFICANCE	
<b>High</b>	A weakness where there is substantial risk of loss, fraud, impropriety, poor value for money, or failure to achieve organisational objectives. Such risk could lead to an adverse impact on the business. Remedial action must be taken urgently.
<b>Medium</b>	A weakness in control which, although not fundamental, relates to shortcomings which expose individual business systems to a less immediate level of threatening risk or poor value for money. Such a risk could impact on operational objectives and should be of concern to senior management and requires prompt specific action.
<b>Low</b>	Areas that individually have no significant impact, but where management would benefit from improved controls and/or have the opportunity to achieve greater effectiveness and/or efficiency.

## APPENDIX III - TERMS OF REFERENCE



### KEY RISKS

Based upon the risk assessment undertaken during the development of the internal audit operational plan, through discussions with management, our collective audit knowledge and understanding, and the areas of focus of the Equality Framework for Local Government, the potential key risks associated with the area under review are:

- ▶ There are insufficient levels of information gathered about local communities and groups with protected characteristics and/or information is not used to engage with and foster community relations.
- ▶ There is no one to champion EDI within the Council and ensure sufficient partnership working has been established.
- ▶ Equality objectives set are not regularly monitored or scrutinised to establish progress.
- ▶ Mechanisms have not been established throughout the procurement cycle to ensure equality standards are met.
- ▶ The Council has not taken steps to ensure the profile of its workforce broadly reflects the community it serves.



### SCOPE APPROACH

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The following areas will be covered as part of this review:

- ▶ Using the Equality Framework for Local Government we will review the four modules and 17 themes that sit under them. We will look to assess the Council on the work completed so far against these themes and provide a view as to where we feel, based on the evidence, they would sit for each using the maturity ratings of either Developing, Achieving or Excellent.

This will be an advisory review, looking to provide a baseline agreed with the Council, as to where they sit on the maturity ratings provided. This will enable them to identify areas of focus and self-assess in the future to establish progress. The scope of the review is limited to the areas documented under the scope and approach. All other areas are considered outside of the scope of this review. However, Internal Audit will bring to the attention of management any points relating to other areas that come to their attention during the course of the audit.

We assume for the purposes of estimating the number of days of audit work that there is one control environment, and that we will be providing assurance over controls in this environment. If this is not the case, our estimate of audit days may not be accurate. It is intended that this audit will be completed through a combination of remote working and onsite meetings and testing, based upon the most effective way of carrying out the work.

In delivering this review BDO may need to observe and test confidential or personal identifiable data to ascertain the effective operation of controls in place. The organisation shall only provide the Shared Personal Data to BDO using secure methods as agreed between the parties. BDO will utilise the data in line with the General Data Protection Regulations 2016 (GDPR) and the Data Protection Act 1998, and shall only share Personal Data on an anonymised basis and only where necessary.

**FOR MORE INFORMATION:**

**Aaron Winter**

Aaron.Winter@bdo.co.uk

The matters raised in this report are only those which came to our attention during the course of our audit and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. The report has been prepared solely for the management of the organisation and should not be quoted in whole or in part without our prior written consent. BDO LLP neither owes nor accepts any duty to any third party whether in contract or in tort and shall not be liable, in respect of any loss, damage or expense which is caused by their reliance on this report.

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