



**Equality Peer Challenge**  
**London Borough of Croydon Council**  
**Report**  
**4-7 November 2019**



## 1. Background

The London Borough of Croydon (LBC) asked the Local Government Association (LGA) to conduct an Equality Peer Challenge against the “Achieving” level of the Equality Framework for Local Government. This report is a summary of the peer team’s findings. The Peer Challenge is designed to validate a council’s own self-assessment by considering documentary evidence and carrying out a series of interviews and focus groups with employees and other stakeholders.

The basis for the Peer Challenge is a benchmark against five areas of performance. They are:

- Knowing your communities
- Leadership, partnership and organisational commitment
- Involving your communities
- Responsive services and customer care
- A skilled and committed workforce

The Peer Challenge is not an inspection; rather it offers an external assessment by critical friends who have experience of delivering an equality/diversity agenda in their own councils.

Peers were:

Councillor Brigid Jones – Birmingham City Council
Sam Johnson – BCP Council
Akua Agyepong - Kent County Council
John Cowings – Derbyshire County Council
Gill Elliott – Local Government Association
Laura Wilson – Local Government Association (Shadow peer –part)

The team appreciates the welcome and hospitality provided by the Council and would like to thank everybody that they met during the process for their time and contributions.

## Executive Summary

Following this Equality Peer Challenge, we have reached the following conclusion:

**The London Borough of Croydon has completed a satisfactory self-assessment against the criteria for the Achieving level of the Equality Framework.**

We were impressed by the strong commitment to equality from political and organisational leaders within the Council. The two cabinet members with lead responsibility for equality are seen as highly effective in bringing about positive changes. Member champions for diversity bring energy, passion and leadership on a number of equality issues. In 2014 the Executive Leadership team did not reflect the borough or the workforce. Now it is visually diverse and members of the Executive Leadership team are serving as role models for the rest of the organisation. The Chief Executive is widely credited with accelerating the positive culture change and prioritisation of equality, diversity and inclusion in the Council. Managers across the authority spoke confidently and with excitement about their work to advance equality of opportunity.

There is a clear link between equality, diversity and inclusion and the council's ambitions, from the political administration's manifesto to the corporate plan to cabinet responsibilities. Equality governance is spread across the Council and includes the corporate leadership team, Cabinet, the members' equality and oversight group and staff equality networks. Equality scrutiny mainly takes place when particular policies are taken to a scrutiny committee. However, scrutiny on equality more generally could be strengthened by making one of the existing scrutiny committees responsible for monitoring the outcomes of the equality strategy and achievement of its objectives. The equality staff networks are well supported and are really making a difference to the progression of equality within the organisation.

The Council's support for equality and diversity is visible in the community. It supports and participates in numerous celebrations and events including Pridefest, Mela and Diwali. LBC has strong partnerships with its statutory partners and the voluntary and community sector (VCS). Organisations representing the VCS feel that they are equal partners with the Council and that they are consulted with and can influence the decisions of the Council through the Local Strategic Partnership (LSP). We heard about many good examples of how the Council works well with its partners to deliver services, including the introduction of Integrated Community Networks and community-based multi-disciplinary interventions as part of the One Alliance partnership between the Council, health partners and Age UK Croydon. Another excellent partnership is Croydon Works, a job brokerage partnership between the Council, Croydon College and Job Centre Plus. It was set up to ensure disadvantaged Croydon residents are able to access the job and training opportunities that will be created by the regeneration Croydon is set to see over the next few years.

Use of data is an important and an improving element of the Council's operations. It collects and uses a wealth of data from a wide range of sources including health and

other partners. Data is utilised effectively to support the Council's new localities-based approach to service delivery. Services are starting to be tailored to meet the needs of communities and are responsive in the recognition of the various inequalities, needs, strengths and characteristics in each. This connected community approach is being piloted in three specific areas – North Croydon, New Addington and South Croydon. However, there are still some challenges around data sharing, particularly with health partners.

There are almost 400,000 residents in the borough which is estimated to rise to approximately 445,000 by 2031. Nearly 51.7% of Croydon's residents identify as BAME and reside mainly in the north of the borough. The resident profile of the south is significantly less diverse than their northern neighbours. LBC has a good understanding of its communities, including the BAME community, although we found that this knowledge is not consistent across all services and the Council works hard to involve its community in the development of services. The participation of young people is particularly strong.

The Council is keen to improve access to its services. The Gateway approach focuses on the broader, holistic needs of people and aims to reduce the barriers to and between services. One of its portals, the Family Centre was highly praised by service users and described as "amazing", for its "can do – solution focussed" approach. The Council has plans to improve the customer service at Access Croydon in terms of its physical layout, IT provision and staff resources. Good progress has been made on the plan, and priority should be given to ensuring that funds are available for the remainder of the plan to be implemented without undue delay. Staff reported feeling empowered to be responsive to customer needs but worry about the impact of the time this takes on performance measures and are acutely aware of the limitations of the current offer.

Equality Impact Assessments (EIA) are integrated systematically into service planning and decision making across the organisation. However, the quality of EIAs overall still needs to be improved. The quality of analysis is variable and assumptions are being made in some EIAs where there is no data to support them.

It is very clear that the Council has embarked on significant culture change within the organisation. A staff survey in 2017 found that whilst the vast majority (91%) were proud to work for the local authority, 41% felt bullied, harassed or discriminated against. Workforce data also showed that minority groups such as BAME, people with disabilities and LGBT staff were not representative of the community at senior levels of the organisation.

The council commissioned an external review of its workforce policies and practices, and all 17 of the recommendations from the review – on issues including recruitment, appraisal, codes of conduct and training and development – were incorporated into a new Workforce Strategy. Diverse recruitment panels have been put in place for senior appointments. There is targeted leadership development for BAME and women and plans in place for leadership development for disabled staff. Around a third of staff who have attended these programmes have already been promoted within the organisation. However, the appraisal process, which is no longer linked to

pay, still has an over representation of BAME staff in the lower quadrants. Levels of BAME grievances have fallen but are still too high and black men are still not progressing in the organisation at the same rate as their female counterparts. Further exploration to determine why this is the case should be undertaken and action taken, to address this incongruity.

Rates of non- disclosure about protected characteristics by staff are 34% for all protected characteristics including sex and race. The organisation has undertaken some work to increase disclosure rates and plans to build on this work this year.

The Council offers a wide range of learning and development opportunities for staff around equality and diversity issues with some equality training for new starters and managers being mandatory. Despite this, some staff were not aware of the council's equality objectives, though they had been in place since 2016. This could be addressed as part of the service planning process and with better internal communication via the intranet, team briefings and staff networks and noticeboards.

Staff feel well supported by their managers, but this is not consistent across the whole organisation. We heard that some requests for reasonable adjustments from disabled staff are being treated more as recommendations by managers and not as measures they are required to take. BAME and disabled employees are still disproportionately involved in disciplinary and grievances procedures.

We found some outstanding and even exemplary HR practices and policies. The organisation is Level 2 of "Disability Confident". It pays employees the London Living Wage and encourages other employers in the borough to do the same with its Good Employer Charter. The Council has a low gender pay gap of 1.6%. It also measures disability and ethnicity pay gaps (ahead of legislative requirements, demonstrating that it recognises inequality in pay beyond single characteristics). Croydon was the first council to publish menopause guidance and this has already had positive outcomes in the workplace. The apprenticeship scheme is very accessible and has a high proportion of apprentices with a learning disability. There are good industrial relationships with the Trade Unions, with opportunities to harness the resources of the trade unions to positively contribute to the equality agenda.

## **2. The Council made the following observations on the impact of the peer challenge:**

Croydon has equality and diversity set at the very heart of our borough. We are very proud of our borough, its diverse mix of people and places that makes it a great place to live and work. Our ambition is to ensure growth that benefits all in the borough, and improving equality of, and access to, opportunity. This is set out in our Opportunity and Fairness Commission report, and embedded in

our Community Strategy, Corporate Plan and supporting strategies. The organisation has made great strides in responding to and delivering against the strategies and plans.

Our vision is to be a high performing organisation that is collaborative, inclusive and innovative, that allows talent to flourish and builds our workforce capability to meet our ambitions and reflect our community - where everyone can speak up, speak out and have a voice in the future direction of the organisation - where fairness and justice feel real, and where bullying, harassment and discrimination are not tolerated.

We are proud of the actions we have taken to date and recognise we have much more to do. This is why the Council proactively sought to undertake the Equality Framework for Local Government (EFLG) Accreditation. The process and our external assessment have helped us to identify and confirm what we do really well and where we need to improve.

We would like to thank the peer team for their time and effort and look forward to working with the LGA to drive through our improvement plan and deliver better equality outcomes for our staff, residents and communities.

### **3. Detailed findings**

#### **3.1 Knowing your communities**

LBC's operating model is based on six key themes which set out the way the council wants to deliver its services to ensure that it achieves the best outcomes for residents. The first theme is 'evidence is key.' It tasks the organisation with ensuring that data and evidence is used to inform the development of key priorities and future service design. In 2016, the Council commissioned an Opportunity and Fairness Commission (OFC) to survey residents on their feelings about poverty and inequality to examine issues affecting the Borough such as deprivation. The work of the OFC has since supported the Council's ambition to reduce inequality and promote fairness for all communities, leading to the development of the Opportunity and Fairness Plan 2016-2020 setting out the council's equality objectives. This drew on information from the Borough Profile, Index of Multiple Deprivation, as well as the views of 3,000 people including staff, residents, local businesses, community and voluntary organisations.

The Council currently gathers, stores and uses a wealth of data from a wide range of sources including health and other partners, the Croydon Observatory, JSNA, Office of National Statistics, Census, public health data, and locality mapping. There are shared data sets across key partners, for example Job Centre Plus and Croydon Working. The One Croydon Alliance on health issues has shared data protocols and there is parity of esteem amongst its members. Its data informs the Council's localities work. Members have a good understanding of their communities and contribute soft intelligence and information about their wards.

There are still challenges around data sharing, particularly with health partners and some of the Council's data is inconsistent with that of partners. For example, the number of people with a learning disability in the borough and the number of unaccompanied asylum seeker children. Data storage appeared to be somewhat ad hoc and not all in one place or easily accessible to services. The Insight, Data and Performance Team is skilled at challenging stereotypes, recognising gaps in knowledge and double-checking what data is really saying by consulting with communities. There has been an intelligent evidenced based response to issues, for example the Violence Reduction Partnership and the Vulnerable Adolescents Review which has informed real changes in practice. Data is being used to improve services, for example school admissions.

In following the 'evidence is key' theme, the Council recognised that it needed to develop a detailed data picture of each locality area to combat inequality. This led to the development of its localities based working approach as one key response to the effects of austerity and different levels of vulnerability and need in the borough. Data and intelligence are used to determine the priorities in each area. The approach is helping to tailor services to communities most in need. It has involved adapting the way that the Council delivers and commissions services to respond to the various inequality, needs, strengths and characteristics in each of its communities. The approach is being piloted in three areas – North Croydon, New Addington and South Croydon.

There are different levels of equality data collection/use depending on the service. Some services such as Children's and Adults Services are good at using equality data to develop links between services and improve services. For example, data was used to reduce the number of late applications for primary admissions. Following analysis of the data, the group of parents or carers most likely to make late applications for primary school was identified. Specific communication channels and opportunities were used in order to target the groups to reduce the number and increase the opportunity for parents to apply to their first preference school.

Not all managers are confident about interpreting equality data, although there has been some good work to address this. The data team are centrally managed, but they also work closely alongside services department spending part of their time co-located in the areas that they are serving and attending the management meetings of their departments to ensure that data is being shared and the team is focusing on areas of most impact. However, this does not always include sharing equalities data or focussing on areas of equalities need.

LBC does have an understanding of its BAME community but it needs to ensure that it fully understands the diversity of the various communities making up the 'BAME' community, for example Eastern European communities. Given the large numbers of BAME people in the borough it should be possible to present disaggregated data on BAME communities in council documents and other communications. The voluntary and community sector also said that the Council understands the sensitivities of different communities in the borough, for example supporting the use of food shops rather than food banks.

There are some gaps in the Council's knowledge of communities in the borough such as the LGBT+ community. Data in relation to these other protected characteristics seemed to be less well developed and utilised. The data used tended to be quantitative and it was not clear how the Council tapped into more qualitative and experience-based data from harder to reach protected characteristic groups. The authority may want to explore how it can develop better data on less familiar groups using a broader range of methods, including consultation and engaging directly. Engaging with smaller organisations that work with these communities or identifying partners who may already be delivering services in Croydon may help to fill these data gaps.

## **Recommendations**

Ensure that any new systems capture all the protected characteristic data of service users and the community.

Consider how to provide all staff with the skills and confidence to collect and interpret protected characteristic data and understand the importance of that data.

Enable the data teams to share equalities data with service teams so that there is a greater focus on equality impact and need in these discussions.

## **3.2 Leadership, partnership and organisational commitment**

There is strong commitment to equality from political and organisational leaders within the Council. They recognise that more needs to be done but there is a good level of pride and eagerness to learn and improve. Both the Chief Executive and the Leader have an "open door" policy. Member champions for diversity bring energy, passion and leadership to particular issues such as autism, mental health, dementia and BAME. The borough has declared itself a "White Ribbon" borough to highlight the issue of domestic violence. The Leader is a White Ribbon ambassador and a champion for the LGBT community. The Chief Executive is widely credited with accelerating the positive culture change in the organisation. She is seen very much as a role model and staff praised her for her visibility within the organisation and her willingness to talk to staff. There is a visually diverse leadership team which has had a positive impact on staff.

The new administration has led a clear shift in making equality and inclusion a priority. There has also been a strong drive on early intervention and prevention work via the Localities model. There is a clear link between equality, diversity and inclusion and the council's ambitions, from the political administration's manifesto to the corporate plan to cabinet responsibilities. The Corporate Plan 2018-2022 sets out commitments to ensure that no community is left behind. The plan outlines its key priorities, one of which is to continue to eradicate inequality and ensure that Croydon is a place where all have the opportunity to live, work and flourish.



Progress is monitored at the members' equality and diversity oversight group. Cabinet members understand their areas and could talk in detail about what is needed. Both the named cabinet members with lead responsibility for equality are widely praised for their leadership and support of the issue.

Other elements of equality governance at LBC include the corporate leadership team, the six staff equality networks and Cabinet. The Culture Board brings together all that the council does to make sure that it has the right people, with the right skills doing the right jobs to deliver better outcomes for local people. Membership includes the Chief Executive, Executive Leadership Team, Chairs and Sponsors of the Staff Diversity Networks, Equalities Manager and representation from Human Resources, organisational development and communications. The organisation is currently in the process of refreshing its Culture Board. The Council may consider establishing a service level steering group (constituted with Assistant Directors) to ensure that services have equality at the forefront of their work when developing and delivering their service plans. The Council might also consider reviewing the level of resourcing for the corporate equality function to provide some support for the one equality officer.

Opposition members feel much less engaged with the equality and diversity agenda. Those we spoke to said that they would like to be more involved. Several councillors raised concerns about the increased adversarial nature of politics between members and from the public, particularly at Council and planning committee. It is important to ensure that all representatives of LBC live up to its values and behaviours, and support members to do so. The Council wants to encourage people from all parts of the community to take part in civic life as councillors and in the community, but people with a protected characteristic may well be put off if there are obvious tensions and poor standards of behaviour between Council members. Consideration should be given to training for chairs of meetings to recognise and handle inappropriate behaviour. Any efforts to reduce tensions should be on a cross party basis. The Council is aware of the issues that have been raised and are currently addressing them via a governance review. The review is making recommendations around democratic engagement with the population and greater backbench involvement in decision making and policy development.

There is no overview and scrutiny committee with equality and diversity specifically in its remit, although scrutiny committees do take equality issues into account when considering reports. Examples include the workforce strategy, the parking policy and the night time economy. The Chief Executive also takes an annual report to scrutiny that includes equality issues. It is important that scrutiny members continue to consider the equality implications of reports they look at, and the Council could also consider giving one of the existing scrutiny committees the responsibility for scrutinising progress against the equality strategy and objectives.

The Council has strong partnerships with its statutory partners and the voluntary and community sector (VCS). The Council's VCS strategy sets clear priorities for joint work. Despite reductions in Council budgets, its support for the work of the VCS has been preserved. Sector representatives praised the involvement and engagement of

individual council members with the work of their member organisations across the borough. They feel that the Council understands the role of the VCS as a “broker” between the community and the council. They described how they work with the Council to get messages out to their communities at times of crisis, such as after stabbings or hate crimes.

Much of the VCS has also started to adopt the localities model of working. Umbrella organisations for the sector now feel that they have more of an equal voice “at the table” and that they are consulted with and can influence the decisions of the council and other partners via the Local Strategic Partnership. They see themselves as a critical friend to the local authority. They understand that many of the council’s services are now being accessed online but also feel that there needs to be more investment from the council in ensuring that residents have the right digital skills.

There was a general view expressed by most of the voluntary sector organisations we spoke to that the high turnover of commissioning/contract management staff in the council makes relationship management harder to maintain as new staff do not understand their issues. Better handover arrangements would help to alleviate this. Some VCS organisations feel that commissioning officers do not always understand the culture and context they are operating in. They gave the example of complex monitoring for organisations receiving very small amounts of funding. VCS organisations would also like greater clarity on how they can get access to being based in council buildings. They felt that the current system is rather obscure and perhaps based on who you know in the council. We understand the Council is already addressing these two points. Recommissioning of the community fund was designed based on VCS feedback and the monitoring is much lighter for those on lower funding levels. There is a draft policy going to Cabinet, which sets out clear and transparent approach to property and property subsidies.

Procurement and commissioning is being used effectively to deliver equality outcomes. LBCs values are fed into tender specifications. Contracts in excess of £100,000 are assessed with equality metrics. Service providers are required to collect equality monitoring data and provide equality training to their staff. Potential contractors are required to provide apprenticeships where possible for those who are furthest from the job market or from hard to reach groups. LBC has signed up to the Anti-Slavery Charter and the Construction Charter and insist that those who deliver services on their behalf have proper whistleblowing policies and procedures in place to reduce exploitation and discrimination. LBC has been successful in ‘disrupting’ the market which has led to increased wages for carers and better quality adult social care. It asks providers to work to similar objectives through a Suppliers Code which requires suppliers to pay the London Living Wage. This has worked particularly well in the Health Care Sector where it is impacting on BAME people who are over represented in the care sector. Larger council contracts are frequently broken into smaller lots so local companies can get access to them such as pest control and cleaning services.

The Council supports and participates in numerous celebrations and events including Pridefest, Mela and Diwali. It has recognised that celebrating diversity is also a good opportunity to showcase local businesses and boost the local economy. An example of this are the events held in Surrey St Market during Black History Month.

The quality, use and outcomes of Equality Impact Assessments (EIAs) still needs to be improved. Several that the peer team saw lack analysis and assumptions are being made where there is no data to support them. Intelligence from frontline staff is not routinely used to inform analysis. There needs to be earlier engagement with communities about EIAs. Too many EIAs record that, “everyone has equal access to this service” for all protected characteristics. There is concern from opposition members that EIAs are never mentioned at Cabinet and changes to proposals as a result of EIAs are never very evident. The implementation of outcomes needs to be monitored with heads of service and executive directors being held accountable for the outcome.

### **Recommendations**

Consider establishing a service level steering group (constituted with Assistant Directors) to ensure that services have equality at the forefront of their work when developing and delivering their service plans.

Strengthen scrutiny on equality more generally by making one of the existing scrutiny committees responsible for monitoring the outcomes of the equality strategy and achievement of its objectives.

Consider how the council can assess outcomes for contracts in excess of £100,000 using equality metrics as well as contract monitoring in relation to collecting equality information and providing equality training for staff. There is a need for consistency across the organisation and support to ensure this is happening.

Review the level of resourcing for the corporate equality function to provide some support for the one equality officer. Increased organisational capacity would also help to improve EIA monitoring within services.

### **3.3 Involving your communities**

There are some good examples of how the council involves its communities in developing and delivering services. The Get Involved consultation platform enables residents to influence policy making via an app, PC or tablet. There is also more direct engagement, for example staff went out to the Whitgift Centre to consult with the public face to face about changes to the provision of respite services. There was community involvement in the closure of homes that provided overnight respite care services and redirection of funding to the Cherry Hub.

It is important to consult with the broadest possible range of people. We heard from VCS partners and staff that the Council is not talking to the more hidden communities such as LGBT people or people from A8 countries such as Poland and

Latvia. It is also important for less obvious partners to be involved such as young carers in the One Croydon Alliance. Not all consultations have equality impact assessments and this is something the council wants to address. Using equality analysis can help to identify potential consultees who may not be immediately obvious. The Council would benefit from developing links with smaller communities to help inform understanding of their needs and incorporate them into the development of services.

The Council needs to ensure that communities and service users are informed of the outcomes of consultations. We heard from one organisation that they had contributed to consultation for the “Walk in Our Shoes” report, were informed of the subsequent recommendations and felt listened to at the time but were not informed of the outcomes or if any of the recommendations have been taken forward at all.

The participation of young people in representing this group is particularly strong. There are many opportunities for them to be involved in developing and improving services for young people. Examples include the Young Director Apprenticeships, the Forum for Special Educational Needs, the Youth Offending Forum, Total Respect training where young people train council staff and members, the Youth mayor and the Care Leavers Forum. The new Children in Care forum EMPIRE is very active and represents diversity well.

Community Ward budgets are a useful tool for members to get involved and to give local residents a say in how the money is spent in their areas. It might be a good idea for the Council to consider developing some criteria for what the community budgets are spent on to ensure that projects are contributing to their own strategies and meeting the most need in the borough rather than an individual councillor’s preferred project.

The Asset Based Community Development approach is welcomed by some in the voluntary sector as a way of empowering and involving people. Most felt that it was working well. The Council does need to consider that communities with fewer assets might need more support and services.

It will be important for the Council to continue developing its approach to communications to improve access to services. Take up of some services is low, for example, personal payments. The Council should continue to improve and maximise communication channels both internally and externally. It may wish to explore how it can develop engagement opportunities for smaller less visible communities with a protected characteristic, using conversations and smaller scale engagement to help shape its services to those communities.

## **Recommendations**

Ensure that all consultations have an EIA. This is important due to potential legal implications relating to meeting PSED and Gunning Principles. The organisation should also monitor participation on consultation so that they know which communities are not engaging.

Develop links with smaller communities in the borough to provide better understanding of their needs when developing services.

Ensure that communities and service users are informed of the outcomes of consultations.

Develop some criteria for what community budgets should be spent on to ensure that projects are contributing to the Council's own strategies and meeting the most need in the borough.

### **3.4 Responsive services and customer care**

There is a clear intent to link services to the equality agenda. Service delivery plans set out how their services will contribute to the corporate plan and the equality objectives, as well as indicating how equality and diversity data has been used to plan services. Some services are less good at identifying the link with equality, but staff felt that there could be a stronger focus on the equality outcomes of service delivery. Conversations have been held with the community to identify diverse needs that can be met with targeted interventions. Services include credit membership of food shops instead of food banks that sit alongside a range of other frontline services making them more accessible.

The Localities approach is a desire to shift services away from "One size fits all". It is already working in the three areas where there is the most need. Children's Services and Education are moving to locality working to make services more tailored and responsive to local need and address differences. An example of a good tailored project is St Mary's School and pupil referral unit which targets resource to address intense pupil need. As the localities approach is expanded it will be important to ensure that services are responsive to the needs of the whole borough including the south and that the area-based approach doesn't create new inequality. The Council may wish to consider auditing access for people across the borough to ensure that those outside the areas where services have been prioritised are enjoying the levels of access they require.

There are many good examples of how the Council recognises the nuances of its different communities and works well with its partners to deliver services which are meeting diverse needs. For example

- domestic violence groups for Asian women
- knife crime workshops
- early services for children and families linking them to VCS support to prevent crisis.
- work with landlords to create affordable housing and also tackling poor housing

- schools are being encouraged to work in partnership with the Information, Communication, Technology (ICT) sector to improve diversity in the sector
- the dominoes club to engage with afro-Caribbean men
- Tamil men's group
- Refugee Support Centre

We also heard about initiatives the Council is investing in to save money in the future and achieving better outcomes. Unaccompanied young asylum seekers aged 16-18 are being placed in foster care rather than supported living. Although it is more costly, it saves money in the long term and gives better outcomes for the young people because supported living accommodation can become a magnet for exploitation. An Unsuitable Housing fund has been created to provide homes for families where their accommodation is unsuitable and where children might have been taken into care. The initiative keeps families together and has made savings of around £420,000.

There is currently no real sense of how accessible services are across the borough. For example, officers recognise that there is a gap in LGBT+ health provision. They also recognise that they could make better use of Member expertise. Staff also said that they could provide more responsive services if they had more information and insight about other services in the Council. They felt that there should be better communications between departments to improve the customer experience with more sharing of and access to information, within the boundaries of GDPR.

The Council is keen to improve access to its services. Its Gateway approach enables a focus on the broader, holistic needs of people and reduces the barriers between services. One of its portals, the Family Centre, is praised by service users for its “can do – solution focussed” approach. It provides a gateway to a range of services for communities which may not have traditionally engaged with the council or specific services because of cultural or other reasons. One service user commenting about a member of staff said “She did in 5 hours what nobody had done for me in 5 years”. The Council has a policy of sharing buildings with key partners to make access to services easier. For example, the Department for Work and Pensions (DWP) is located at Access Croydon in the Council's main building. Council welfare advisers actively help people with their DWP claims.

There are plans to improve service delivery at Access Croydon in terms of the physical layout, IT and staff resources to provide responsive services and improve the outcomes for the people who attend. An equality audit had identified that staff were working in a hostile environment and that the customer experience was poor. Changes have already been made such as the removal of telephones from walls to make them more accessible and the relocation of the credit union to a more discreet area to provide better privacy for customers. Personal space has been improved to support vulnerable people such as survivors of domestic violence, which has

enabled services to be provided with respect and accessed with more dignity. There is a strong emphasis on developing staff to be able to meet customer needs, for example Family Centre Staff will be training the Gateway Team at Access Croydon making good use of their expertise and good practices to improve services. Staff feel empowered to be responsive to customer needs but worry about the impact of the time this takes on performance measures. The Council should consider whether services to meet equality needs are adequately resourced in the Contact Centre. The opening hours of the Contact Centre 08.00 to 4.00 Monday to Friday may not be responsive enough to all customer needs. We also heard that the out of hours contact facility is not always adequate.

The digital offer, with regard to the existing website, online services and internal systems needs to be more responsive to staff and customer needs. Staff have had an upgrade of their laptops but not to full functionality. Some web pages also need to be better, for example we were told by some staff that the My Account feature does not always work. We understand that staff have high quality equipment and core software - full enterprise suite of Microsoft Office 365 apps enabled, so it may be more an issue of training, capability and behavioural change as opposed to technology issues. The VCS thought that the Council could do more on digital services by providing more training and outreach for residents and taking longer to roll out new systems to enable people to adapt to new ways of working. There is a commitment to address these issues in the Council's Digital Strategy, published in July 2019 which is already being delivered.

Young people are involved in developing services and commissioning suppliers. The Young Commissioners Scheme enables the young people to score services. They are also listened to in recruitment processes. As a result, people like youth workers with lived experience of the young person's issues may be given preference over social workers.

## **Recommendations**

Increase the focus on the equality outcomes of service delivery. Service delivery plans do set out how their services will contribute to the corporate plan and the equality objectives. However, services should not lose sight of the outcomes and the difference that is actually being made.

Consider auditing access to services across the borough to ensure that those outside the areas where services have been prioritised are enjoying the levels of access they require. This would include the south of the borough.

Enhance opportunities for greater communication between staff in different departments. This would allow for more sharing of and access to information, (within the boundaries of GDPR) to improve the customer experience.

Review the opening hours of the Contact Centre as they may not be responsive enough to all customer needs.

### **3.5 A skilled and committed workforce**

It is very clear that the Council has embarked on significant culture change within the organisation. A staff survey in 2017 indicated that although the vast majority (91%) were proud to work for the local authority, 41% felt bullied, harassed or discriminated against.

The Council set out to gather more data and opinions from staff to find out what the issues were and where the barriers to making the workforce more diverse at all levels were. A consultant was employed to work with HR to undertake deep dive investigations and focus groups with staff. The work was overseen by Members. The result was 17 recommendations which have been incorporated into a new Workforce Strategy. Amongst the recommendations were diverse recruitment panels, a new appraisal process and codes of conduct for staff and Members.

The staff we spoke to understand that the Council is on an improvement journey and are proud to work for Croydon and “proud to serve”. They feel that the Council has exceeded their expectations as an employer. In 2014 the Executive Leadership team was all white. Now it is visually more diverse and members of the Executive Leadership team are serving as role models for the rest of the organisation.

Targeted leadership development for BAME and women has already started to see results. 33% of the 75 BAME staff and 37% of women who took part in the programme have either been promoted, seconded or had a new interim post. There are also more opportunities for coaching and mentoring for all staff. The Council is working on reciprocal arrangements with neighbouring boroughs to deliver on the recommendation for diverse recruitment panels. The appraisal process is no longer linked to pay, however BAME staff are still over represented in the lowest quadrants. Whilst levels of BAME grievances have fallen they are still too high. Despite all these initiatives black men still do not appear to be progressing at the same rate as their female counterparts. Further exploration of the reasons for this is required.

The Council has a baseline of workforce data to measure improvements. However, despite a high-profile campaign, rates of disclosure are still very low at around 34% for all protected characteristics, including gender and race. This is unusual as it is more common to have low disclosure for sexual orientation, religion and disability. Problems with the computer system may account for some of this but we also heard from staff that people are worried that disclosure of protected characteristics will impact negatively on them in restructuring exercises or the attitude of their manager. The organisation needs to improve its level of disclosure against the equality monitoring data and it has started to address this. It also needs to review the presentation of workforce data to more easily identify where action is needed. The organisation has been responsive to the previous staff survey by planning to use an external provider for the next survey to reassure staff about anonymity.

Spending on learning and development has been increased to take account of the culture change and new approaches to service delivery such as the localities approach. There are a wide range of learning and development opportunities for staff around equality and diversity issues, such as mental health first aid, and



unconscious bias training. However, there was no planned training around LGBT issues or the development of guidance for the support of transgender staff. Equality training for new starters is mandatory, as are some equality training modules for managers. We found that staff were not generally aware of the council's equality objectives, although they had been in place since 2016. This could be addressed through the service planning process and with better internal communication via the intranet, team briefings and staff noticeboards.

Some staff feel well supported by their managers, but this is not consistent across the whole organisation. Concerns were raised with the peer team that HR policies on sickness, lateness, training opportunities and performance management are not being applied consistently by managers and this is contributing to a sense of inequality and resentment amongst some staff. We heard that some requests for reasonable adjustments from disabled staff are being treated as recommendations by managers and not measures they are required to take. BAME and disabled employees are still disproportionately involved in disciplinary and grievances procedures.

The Council has six equality staff networks covering women, disability, working carers, LGBT, BAME and mental health and wellbeing. They are robust, well supported and are really making a difference to equality in the organisation. Each network has a senior manager as a sponsor and each has a budget of £1,500. They also collaborate on events and other initiatives like the annual diversity conference. This intersectional work could be capitalised further to ensure the outcomes of people are improved. Members of staff network groups felt that their opinions were valued, that they were able to influence the development of policies and working practice. Staff networks say that they have been key to changing the conversations about mental health at LBC. The BAME group had developed their own booklet for its members and to raise awareness and myth bust across the organisation thereby improving relations between those who share a protected characteristic and those who do not. Network groups felt they were recognised for their contributions. Although being active in a network has been incorporated into appraisal processes, frontline staff were concerned that they are not always able to attend staff networks. More early warning about dates of meetings/events would help them to plan their attendance.

There are some examples of good HR practice that is contributing to equality in the Council. The organisation is Level 2 of "Disability Confident". It pays employees the London Living Wage and encourages other employers in the borough to do the same with its Good Employer Charter. The Council has a low gender pay gap of 1.6%. It goes beyond the pay gap legal requirements to also measure disability and ethnicity pay gaps. Croydon was the first council to publish menopause guidance and this has already had positive outcomes in the workplace. The apprenticeship scheme has been a very positive and well planned initiative. It has made good use of relationships with contractors. The scheme is deliberately accessible and has a high proportion of apprentices with a learning disability.

There are good industrial relationships with the Trade Unions and there are opportunities to harness the resources of the trade unions to positively contribute to the equality agenda. The trade unions could also be involved more in developing the council's work on equality and diversity.

It was not clear what arrangements there are for translators and interpreters to provide these services for customers engaging with council services. The Council may wish to explore whether it could use the language skills of its frontline and other staff to ensure quick access to interpreting and translation, whilst ensuring that proper arrangements remain in place when qualified and trained interpreters are required, including for Deaf people.

### **Recommendations**

Undertake further investigation into the reasons why black male employees are still not progressing in the organisation at the same rate as their female counterparts and why BAME staff are over represented in the lowest quadrants of the appraisal results.

Consider ways to increase staff awareness of the council's equality objectives, possibly through the service planning process and internal communication via the intranet, team briefings and staff noticeboards.

Address the inconsistencies in the way HR policies such as sickness, lateness, training opportunities, performance management and reasonable adjustments are being applied by some managers across the organisation.

Ensure that frontline staff are able to attend staff networks, perhaps by giving more early warning about dates of meetings/events to help staff plan their attendance. Increase the opportunities for joint working between networks.

Review the use of translators and interpreters to ensure that the Council is using the most cost effective ways of providing these services.

## **4. Signposting to good practice elsewhere**

### **Equality Impact Assessments**

Rochdale Council has a robust system in place for ensuring that equality impact assessments are undertaken when required and for quality assuring these assessments. It implemented the Mod Gov electronic report management system in June 2014 which ensures that all reports meet Council requirements and are checked and signed off by Legal, HR, Equality, Finance and the Relevant Director of Service before the report proceeds to the relevant committee meeting. Ongoing advice and feedback is provided to managers on the quality of their equality impact assessments.

Contact: Rochdale Borough Council

## **Social Value Indicators**

Good practice examples are Knowsley and Oldham Borough Councils.



Knowsley Social  
Value Outcomes Matr

## **Incorporating equality into business planning**



Management cycle  
matrix.docx

Specific talent management programme for BME by HMRC and the University of Manchester example. They were both winners in the 2014 Race for Opportunity categories re: staff/workforce.

<http://raceforopportunity.bitc.org.uk/tools-case-studies/case-studies/awards-2014-developing-talent-award-progression-hm-revenue-customs>

<http://raceforopportunity.bitc.org.uk/tools-case-studies/case-studies/awards-2014-transparency-monitoring-and-action-award-university>

London Councils has produced an excellent report on the impact of changes to disability benefits on eligibility for Council services.

<http://www.londoncouncils.gov.uk/policylobbying/welfarereforms/resources/disabilitybenefitreform.htm>

Disability Rights UK has produced guidance for local authorities on inclusive communities and involving disabled people.

<http://www.disabilityrightsuk.org/sites/default/files/pdf/1%20%20InclusivecommunitiesLAguidance.pdf>

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