



Adam Norburn
Chief Executive
Rugby Borough Council
Town Hall
Evreux Way,
Rugby CV21 2RR

17 August 2017

Dear Adam

Rugby Borough Council – Local Government Equality Framework Re-accreditation Peer Challenge May 23rd-24th 2017

Thank you again for inviting the Local Government Association to undertake a peer challenge to re-assess your organisation against the “Excellent” level of the Local Government Equality Framework. I am pleased to confirm that the peer team agreed that Rugby Borough Council (RBC) should be re-accredited at the “Excellent” level of the framework. Your new award will be valid for a further three years. This is a significant achievement for a small district council and it’s an achievement that the whole organisation can be really proud of.

The team undertook a desk top analysis of your self-assessment and supporting documents. This was followed up by a two day site visit during which we met with managers, staff and other stakeholders. We really appreciated the welcome and hospitality provided by the Council and we would like to thank everybody that we met during the process for their time and contributions.

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

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

The peers were:

- Councillor Mimi Harker – Chilterns District Council
- Shammi Jalotta – Essex County Council
- Nick Stephenson – Swindon Borough Council

- Gill Elliott – Review Manager LGA

The peer team was very pleased to see that the RBC has maintained its strong focus on equalities since it first gained the Excellent level award in 2014 and that there have been some really good outcomes which were showcased in your case studies and by the staff and Members that we met with.

Equalities is now very much part of general business at RBC and we heard over and over that equality and diversity is “Everybody’s business”.

This letter sets out what we think are some of the many strengths that RBC has with regard to equality and diversity. To help the organisation move forward it also suggests some areas for consideration. Our comments are grouped under the Framework’s five main areas.

1. Knowing your communities

Strengths

The Council has a detailed understanding of its communities and how that translates to inequalities for different neighbourhoods and groups. It has access to a wide range of data from the County Council including the Joint Strategic Needs Assessment (JSNA), Mosaic and the Warwickshire Observatory. This information has helped to inform RBC’s Corporate Strategy, Equality Strategy and the Town Centre Plan.

There was good evidence that the Council is using its knowledge of the community to provide services to minorities or disadvantaged groups. Case studies provided to peers described a number of initiatives with really good outcomes which have relied on data and intelligence. These include projects for the Polish community, housing and site improvements for Gypsies and Travellers, the Homelessness Trailblazer project and the development of a house of multiple occupation (HMO) specifically for women fleeing domestic violence.

Community Associations within the borough are proving to be a good source of community insight and intelligence. Issues around anti-social behaviour and gang culture have been identified and addressed in one area as a result of intelligence gained by the Association. The Benn Centre identified a need for English classes for their community and it now offers ESOL classes. Members also have a good knowledge of their communities and contribute to the insight that the Council has by raising issues from residents in their constituencies.

Areas for Consideration

Ward profiles with key equality and demographic data are available for members to help them in their community role as well as to staff to assist in service development and equality impact assessments (EQIAs). We feel these profiles could be expanded to include issues like long term unemployment rates, houses of multiple occupation

and population density. Data in the ward profiles could be cross referenced to equality data which would enable a better understanding of how the council is meeting the equality duty. The profiles could also be used to measure population and demographic changes over a period of time, enabling the council to forecast trends in order to be ready to meet those changes in the future.

The growing population of the borough will inevitably mean that new and emerging minority groups will settle in Rugby and the Council will need to consider how it can gain information quickly about new communities. Peers heard from a partner organisation that there is an emerging Somali community in the town centre, which although very small is the largest in the county. As with the influx of any new community there will be particular health and language and other needs. Issues like female genital mutilation (FGM) which is illegal in the UK and honour based violence may be very much “Hidden Harm” and affecting only small numbers of people but they have significant impact within certain communities. The council should consider how it can have some strategic input to these difficult issues.

The Council has very little data or intelligence about Lesbian, Gay, Bi-Sexual or Transgender (LGBT) people. We understand that there may be some difficulty or reticence in directly monitoring this protected characteristic, and suggest that RBC develops a clear position statement regarding monitoring customers and staff and sets out clearly how it will understand the needs of residents who identify with this protected characteristic and use them in the development of services and employment opportunities. RBC Staff do have access to an LGBT network based within the County Council. However as the network has a closed membership, data on how many staff from RBC attend is not available. We are aware that the Equality Officer intends to start engaging with an LGBT group in Rugby.

2. Leadership, partnership and organisational commitment

There is huge commitment from the Leader, the senior management team (SMT) the Member Equality Champion and the Equality & Diversity Steering Group around embedding equality policy and practice. This permeates through service managers and staff in the council. The voluntary and community sector partners and Warwickshire County Council partners all applauded the Borough’s commitment to equalities.

The Equality Steering Group includes officers and Members from across parties and it is an indicator of the very good working relationships between Members of different groups and between Members and officers.

The review and re-launch of the grants programme has assisted community groups with a range of projects to apply for and small pots of funding. This has allowed small, medium and larger groups to support their respective service users. It was reassuring to see that RBC is planning for the future and safeguarding their grant supported projects by looking at how it can become self-sufficient as far as its own funding to run services is concerned. This should mean that they could still support community groups in the future with no government funding coming in.

RBC has good working relationships with its statutory partners. It has an excellent strategic working relationship with Warwickshire Police around issues of crime, new communities, community tensions and cohesion. The relationship with Rugby was described as “best practice” in the County and something for others to learn from. RBC are also represented and contribute to the work of the PREVENT Board.

Leaders recognise the “socio-economic” challenges facing communities in Rugby that are at risk of exclusion. This is exemplified in the case studies relating to Homelessness and Universal Credit. RBC is the lead Council in the Homelessness Prevention Trailblazer pilot project across Warwickshire. The aim of the project is to trial new ways to prevent Homelessness at an earlier stage than other local authority models. In response to a growing need for support for vulnerable claimants of Universal Credit the Council has contracted with the Benn Partnership and the Citizens Advice bureau to provide advice and support on a cost per client basis

Areas for Consideration

The organisation has a new Corporate Strategy and a new Equality Strategy. However, whilst the two were developed at the same time, there appeared to be only limited connectivity between the Corporate Strategy and the equality objectives in the Equality Strategy. It will be important for Service plans to reflect how they will contribute to the objectives of both the Corporate Strategy and the Equality Strategy. SMT and heads of service were clear when questioned that they used both strategies simultaneously bringing policies together with supporting evidence for back-up.

The Equality Steering Group could be expanded to include other SMT members. This would assist in disseminating key corporate messages around equality.

RBC should consider analysing its grant allocations by protected characteristics.

Although there are resource implications we think RBC should consider having senior representation on both the Children and Adults Safeguarding Boards to enhance its position and ensure that RBC has a strong voice on these key groups.

The equality impact assessment process is very well embedded within the Council. We felt that the EQIA assessment template and guidance could be reviewed and streamlined to respond better to the changing needs of the organisation. The two templates could be merged into one to simplify the process. A narrative referring to s149 of the Equality Act 2010 could be included in committee report templates to help identify equality implications.

3. Involving your communities

There are good relationship between the officers and Members of the Council with the community, community associations and voluntary sector organisation. This means that individuals and groups have the confidence to bring issues forward, knowing that RBC will deal with them efficiently and sympathetically.

We heard about many services which demonstrate really good understanding of community needs. These include HMOs for women, the Benn Partnership, GLL (Leisure Centre provider) offering gender specific swimming/ sessions for body conscious groups, Rugby World Cup and the Homelessness Prevention Trail Blazer project. RBC is co-designing and co-producing services with customers to create more customer focussed outcomes. Another example is work with the Rugby Disability Forum.

Councillors working with community associations are doing an excellent job as ambassadors for the Council. Some of the challenges for the future include the sustainability of voluntary organisations after 2020 when RBC will lose its revenue support grant and the population growth in Rugby which will put pressure on maintaining services, taking into account that influx of people.

The Council has good relationships with volunteers such as street pastors who are supporting vulnerable people across the town. Rugby has a lively night time economy and street pastors are providing a valuable service.

Areas for Consideration

The Council could benefit by working more closely with community groups to see how they can support its equality objectives.

We felt that the Council could do more to improve its communication with residents, particularly over contentious issues. We heard a great deal about the Green Waste Collection Scheme and it's clear that the Scheme has so far been very successful in meeting its targets. However the perceived miscommunication with residents has resulted in a reported atmosphere of discontentment and lack of trust in the Council. A specific complaint we heard was that a survey of views gave no means to properly respond

More could also be done to "re-ignite" contacts with faith groups and to link people together if this is what they want.

4. Responsive Services and Customer Care

We found some very good examples of flexible and responsive services, particularly in responding to customer needs. Initiatives to signpost the Polish community to services were particularly impressive. The Polish language website is also used by partner agencies. The Council has also been bold in tackling the issue of child sexual exploitation by working with partners to provide training for hotels, bed and breakfasts and taxi drivers. All new taxi drivers are required to attend the training and then every three years as part of their licence conditions to ensure they are aware of their responsibilities in protecting their passengers.

Staff and managers said that they were encouraged to find solutions to customers' needs. For examples identifying and individually responding to specific access requirements of customers attending the Town Hall.

Staff reported that improved technology is helping them to be more agile in the way they work. Laptops and tablets are enabling them to work from home and also to have access to back office services whilst they are out in the community or visiting tenants and residents at home, thus providing a more efficient and speedy service.

Newer Council buildings appear to have excellent accessibility. We learned that the new Rugby Art Gallery & Museum (RAGM) is very accessible to the community and that advice was sought from the equality officer over aspects of its design. It has low level tills for wheelchair users as well as hearing loops and staff are trained to use coloured overlays for printed information to assist people with dyslexia. The Accessibility Statement for the Centre was impressive and should be used as a model for other services, developments and buildings in the town.

Areas for Consideration

More opportunities for staff to learn about good ideas from colleagues in the council would really help to spread good practices across the council. Cross departmental groups such as quality circles or action learning sets could harness and spread good practice more widely.

Older Council buildings like the Town Hall have less good accessibility. Level access to the committee rooms and the council chamber is poor with temporary ramps, although we understand that there are plans to refurbish the council chamber and improve access. There are also plans to broadcast meetings and improve the provision of hearing loops in committee rooms.

There needs to be greater clarity over how customers access services in the Customer Services Area at the Town Hall. Information about available loop systems and other access provision could be clearer. Directional access into the building could also be identified better. Customers need to be invited to ask for support such as accessing translation and interpretation services.

With regard to procurement, the equality measures in contracts should be very clear to ensure the ability to monitor and review provision. We found that whilst the standard requirements under EU legislation relating to equality were met, more work needs to be undertaken to manage and monitor contracts from an equalities perspective. No strategic oversight document that listed all the major contracts and their measurement and monitoring from an equalities perspective was found.

5. Skilled and committed workforce

We heard it said several times that ‘Equality and diversity is “everybody’s business”’ at Rugby Council. It is clear that the “Can Do” set of corporate values really does reflect how staff feel about their work for the Council. Staff said they feel empowered to take the initiative within their services knowing that they had the support of their line managers. Members also said that they trust staff to do their jobs. Staff at head of service level were also given flexibility on the use of some budgets, meaning they

could make cost effective decisions and were trusted to make those decisions leading to a greater sense of teamwork and pride in the outcomes of the decision making process.

Staff said they feel really well supported by their managers and the Human Resources team when they need it at times of ill health or disability. Reasonable adjustments such as flexible working, advice, counselling and special equipment are provided in a timely way. The Council has a £10k fund for private health interventions such as scans or physiotherapy to help staff return to work more quickly. Staff are also given time off for medical screening appointments. The trade unions reported that they also receive good support from management and they are confident that issues are dealt with satisfactorily.

Staff reported many opportunities for them to engage with the Council and senior managers. They described team meetings, core brief, quarterly council briefings open to all staff and the attendance of the senior team at staff team meetings. Some of these newer ways of engaging were the result of a recent staff survey.

Staff have access to a wide range of equality and diversity training. Refresher training is regularly available. Manual and customer service staff have had “theatre type” equality training. Some equality training is mandatory, such as for new staff in their induction training. All employees have had training around the Prevent agenda. Members training is also mandatory and should be undertaken every three years.

Staff feel confident in inputting their personal equality data into the system. There is an extremely high disclosure rate of disability and medical conditions. This is unusual but it is an indicator of good trust levels in the organisation.

The Council has a good apprenticeship scheme and really good contact with schools. Contacts with the Brooke School for pupils with learning disabilities has been particularly good and has resulted in some students gaining jobs with the Council.

Areas for Consideration

The Council might need to find a balance around the legal definition of disability so that it can differentiate between this and other medical conditions employees may have. It might also look to capture other data such as employees with caring responsibilities. Further analysis of data captured around LGBT would also identify whether the 0.9% reported LGBT rate is what might be expected (we received feedback that there were more LGB&T staff than this, but no consideration of why reporting rates were this low or a plan to increase confidence in reporting).

We were also unsure whether the Council gathers equality data about elected Members. We would recommend that this is done as a matter of good practice and to help plan for Members’ needs. Members also thought it would be helpful if the council asked them about their disability needs, especially those that were not obvious.

The representativeness of the workforce is still an issue for the Council, although at the most senior level of management the Council is well balanced with regard to women and people from Black & Minority Ethnic Groups (BME). Data has been collected around BME recruitment and the Council is aware that rates of application do not match rates of appointment, although the gap seems to be closing. (3% in 2015/16).

The Council might wish to consider providing some training in Unconscious Bias for staff who take part in recruitment or manage others.

The Apprenticeship Scheme could be a good way of increasing the ethnic diversity of the workforce as well a way of attracting females into work areas which are very male dominated such as building trades.

We feel that there is now an opportunity for the Council to reconsider whether one or more staff networks around equality issues would be a positive way forward. None of the staff peers spoke to were aware of the staff networks within Warwickshire County Council which they are able to access or attend. An equality forum would be of benefit to the Council for help and input on issues like policy development, consideration of EQIAs and sharing best practice. Staff network members also have the potential to be a conduit to minority communities in the town.

A number of HR policies are being reviewed including recruitment and selection. We would like to stress the importance of HR policies like this referencing the legal requirements of equality as well as inclusiveness.

6. Innovation and Good Practice at Rugby Council

Whilst often a common practice the RAGM Access statement was exceptional.

RBC has good working relationships with its statutory partners. It has an excellent strategic working relationship with Warwickshire Police around issues of crime, new communities, community tensions and cohesion. The relationship with Rugby was described as “best practice” in the County and something for others to learn from. RBC are also represented and contribute to the work of the PREVENT Board.

7. Signposting to areas of good practice elsewhere

Disclosure of Sensitive Information

To increase the disclosure rate around protected characteristics like sexual orientation, RBC could consider using Stonewall’s “What’s It Got To Do With You? (Ten reasons why you should fill in those funny box things at the end of forms)” This is a campaign with booklets to encourage staff to disclose protected characteristics.

See <http://www.stonewall.org.uk/sites/default/files/wigtdwy.pdf>

Equality Impact Assessment Processes

Both the Essex CC and Swindon BC Impact Assessment Processes are worth looking at as models.

[Essex: https://www.essex.gov.uk/Your-Council/Strategies-Policies/Equality-diversity/Documents/Equality_Impact_Assessment.docx](https://www.essex.gov.uk/Your-Council/Strategies-Policies/Equality-diversity/Documents/Equality_Impact_Assessment.docx)



DIA Process FINAL
2013.pdf

Swindon:

Finally, once again, we would like to thank RBC for commissioning the challenge and to everyone involved for their participation. The team are particularly grateful for the support provided both in the preparation for the Peer Challenge and during the on-site phase and for the way people we met engaged with the process.

All of us connected with the Peer Challenge would like to wish RBC every success in the future.

Yours sincerely

Gill Elliott

Peer Support Adviser
Local Government Association
Tel No – 07747 753263
Email gill.elliott@local.gov.uk

Local Government House
Smith Square
London SW1P 3HZ
Telephone: 020 7664 3000
Facsimile: 020 764 3030
Email info@local.gov.uk
www.local.gov.uk