

Equality and Best Value

These notes were written by Alden Chadwick (based on various papers prepared by the Northern Officer Group) for use as a Resource Booklet in Sheffield City Council. Sheffield City Council did not use the notes.

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Best Value

Inequality and Organisational Barriers

Introduction

These notes are intended for Officers involved in Best Value Reviews. The purpose of the notes is to provide background information on equality issues and the strategies adopted by Sheffield City Council.

These notes should be used alongside the *Best Value Inequality and Organisational Barriers Question Sheet*.

Summary

Given the Government's explicit commitment that equality considerations will feature at both a corporate and service-specific level when implementing Best Value, it is crucial that Sheffield City Council's Performance Plan and Best Value Reviews reflect the council's equality objectives as set out in the Equality Charter.

The term 'inequality' doesn't have a clear definition. However, it is abundantly clear that some groups in Sheffield (for example, older people, lone parents, people without employment, children in households with no one in work, members of black and minority ethnic communities and disabled people) do not have the same level of choice and opportunity to shape or to take part in many social benefits and activities. This exclusion can arise from a complex interaction of history, culture, social norms, power relations and social institutions; all of which are outside the individual.

These notes suggest that the identification of organisational barriers and ways of removing them might prove to be a practical way of applying concepts of inequality in Best Value Reviews. Barriers, in this sense, operate concurrently at three different levels.

Firstly, services may actively contribute to the exclusion of some groups from participating in society, for example, segregated welfare, educational, transport or leisure services. However, it will be important to distinguish between services that impose segregation, and services that are organised by groups to challenge segregation.

Secondly, our ideas about who our customers are may constitute a barrier. This is because inaccurate models of the identity of 'the customer' inform the nature, content, and approaches to service provision by becoming fixed into organisational policies, procedures and practices. Best Value reviews need to identify these models and compare them with alternatives; alternatives provided by the groups concerned.

Thirdly, there are barriers to services such as inflexible timetables, inaccessible buildings, inaccessible information formats and inaccessible communication formats. These need to be identified and remedies suggested. In short, when reviewing services we need to ask to what extent a service is working to exclude or to include people in wider society, if the models of our customers that underpin our service are inappropriate, and if there are any barriers to the service itself. To make the process of barrier identifying manageable we need to focus on procedures – the formal knowledge and guidance that employees use.

Reviews will need to engage with users and potential users of services. Therefore, this paper recommends that the consultation process be articulated in *Terms of Reference for Consultation*. Such terms of reference can also spell out clearly, how those consulted will be engaged and what they can expect to change as a result of their input.

Contact

For further information please contact the Equality Team – (0114) 27 35408.

Equality and Best Value

Best Value Performance Plans

"Equity ... is inherent in best value. An effective authority will ensure that it is built into the review process and underpins the local performance plan." (The Parliamentary Under-Secretary for Wales, Jon Owen Jones MP replying to the debate on behalf of the Government. *The Local Government Bill 2nd Reading, 12 January 1999*).

"Local Performance Plans will need to reflect authorities' corporate objectives, including those of sustainable development and equal opportunities. And they will complement the various planning and performance management systems already in place or proposed for the key service areas." (*The White Paper Modern Local Government: In Touch with the People*)

Therefore, it is crucial, that the Sheffield City Council Performance Plan reflects the council's equality objectives as set out in the Equality Charter.

Best Value Reviews

Overcoming barriers to consultation is just one aspect of ensuring that all sections of the community benefit from the improvements that it is hoped will flow from best value. Equal opportunities considerations should feature at both a corporate and service-specific level when implementing best value. A failure to scrutinise equality of access during fundamental performance review may lead to higher costs (through for example, higher than necessary risk of litigation) and lower quality of service for those users who continue to receive a substandard service (or no service at all)." (*Audit Commission Management Paper - Better by Far: Preparing for Best Value*)

Reviews should consider the way in which services impact on all sections of the community, and set targets to redress disparities in the provision of services to those that are socially, economically or geographically disadvantaged. Issues of social exclusion and isolation will be important ones for many authorities, and a service cannot be effective under best value unless it addresses equity considerations. Reviews should explicitly consider whether the authority's service provision is compliant with the relevant legislation. (*Implementing Best Value – A Consultation Paper on Draft Guidance (DETR September 1999)*)

There cannot be quality of service without equality. Equality does not necessarily mean providing the same service to all, nor is it about treating all people in exactly the same way. It is about adapting the service to meet the needs of different groups of people." (*TQMI handbook - Achieving Best Value*)

Given that the reviews will be expected to challenge why the particular service is needed at all, and if so, whether it should be provided in any particular form, we need to ask some fundamental questions. Such questions can focus on organisational barriers. But first we need to examine what we mean by equality.

What do we mean by equal opportunities and equality - a look at some commonly used words and phrases

Discourse

What we think and say is informed by what we know - our knowledge, and such knowledge is itself shaped by language. The language used for talking about a particular topic or subject is often referred to as 'discourse'. It is more than grammar and vocabulary, it is about meaning. For example the phrase 'community development' can be used to represent very different meanings and values, depending on who uses it, when, where and why its said. How we define ideas and make rules about how we work is important. The questions that we ask, or can ask, and the answers that can be given to the questions will be limited to an extent by what we know, and the assumptions and values we hold. **Answers to the questions 'what is equal opportunities?' or 'what is equality?' depend on the how we understand and define the idea of equal opportunities or equality.**

Equal Opportunities

Moral and ethical thinking have shaped the idea of equal opportunities. The phrase is usually used when discussing recruitment and selection to jobs and education. There are three variations on the theme.

1. Equal Opportunities: Equal Merit

Originally known as 'careers open to talents'; this approach is not new and was first formulated during the French Revolution. Jobs and educational places should be filled on merit alone. Characteristics such as race and gender (and class background in the case of the French revolutionaries) should be ignored.

2. Equality of Opportunities: Positive Action

The principle is to give positive support to members of groups that have been discriminated against in the past, notably women and black people. Employers are expected to fill jobs based on merit. However, they are expected to encourage applications from well-qualified women and black people by appropriate advertising, carefully designed training programmes and an explicit rejection of discriminatory practices.

3. Equal Opportunities: Positive Discrimination

A policy of positive discrimination requires employers to give positive preferences to disadvantaged groups. A mere intention not to discriminate, may not be enough to ensure that women and black people are actually offered jobs, because they may have been prevented at an earlier stage from gaining the necessary qualifications. Positive discrimination is not legal employment practice for women and ethnic minorities; however, it is lawful under the Disability Discrimination Act (DDA).

This notion of equality is sometimes associated with quota systems that insist that a proportion of women and black people in each job should mirror the proportion of women and black people as a whole.

Problems with Equal Opportunities discourses

The moral and ethical dimensions of equal opportunity are useful in political debates - and traces of them sometimes appear in local authority equal opportunities statements. However putting the moral frameworks in to practice often does not happen. This could be because there is a mismatch between the language of equal opportunities and the ideas that underpin notions of organisational efficiency. There is a gap between principles (which are described as political ideals, and desirable outcomes) and practice (the activity that takes place to deliver actual and tangible outcomes).

Equality

The provision of equal opportunities can be seen as trying to guard against discrimination within unequal systems and structures. **The equal opportunities approach seeks to minimise the impact of inequality for some groups but does not challenge the basis of those inequalities.** The debate about whether inequalities of wealth, power and status are themselves justifiable is shifted to the question of how to distribute these inequalities.

By looking at equality, rather than at equal opportunities, we can examine how action can be taken to give everyone the means to develop their capacities in a satisfying and fulfilling way. Equality cannot be achieved by competing for the jobs and education opportunities we have now - its achievement requires changes that do try to match social roles to individual capacities. **Achieving equality implies a radical re-examination of both our working practices and our service planning and delivery.**

There will of course be a very wide range of opinion and thinking about how equality can be achieved from those who advocate incremental organisational change to more radical advocates of change by revolution.

Equality and Organisations

We all know from our own experiences and some careful thinking about our colleagues that the differences among and within various groups can arise from a complex interaction of history, culture, social norms, power relations and social institutions. All of these are outside the individual.

Best Value reviews therefore need to define which of the complex interactions come within their reach. **In this equality approach the questions become 'how do our organisational procedures and practices exclude people', and 'how can we make them more flexible?'**

However, before we can remove organisational barriers we need to be able to recognise and describe them.

Organisational Barriers

The term 'barrier' can be used in three ways.

- Services as barriers; that is, services that (intentionally or unintentionally) prevent people from participating in wider society.
- Models of identity as barriers; that is the underlying assumptions about who our customers are, what makes them what they are, and what they need may not reflect our customers' understanding of their situation.
- Barriers to services; that is the organisational procedures and practice that block access to services. .

However, the term 'barrier' should be used with caution for two reasons.

- Barriers are often the superficial appearance of deeper social forces, such as, the political economy, power / knowledge or culture. Thus, **barriers are only in a limited way localised to individual organisations. They are widely distributed and often require more than local action for a solution.**
- The term barrier can become a metaphor for a boundary. Some people are within the boundary (for example, non-disabled people, white middle class men) and some are outside it (for example, disabled people, ethnic minorities). Things on the inside of the barrier are thought to be good (for example, employment or western culture) whilst things on the other side of the barrier (for example, unemployment or minority ethnic religions) are thought to be bad and to be avoided at all costs. **This polarised way of thinking fails to recognise that the things on the inside of the barrier may themselves be undesirable, unsuitable, or impracticable for women, disabled people and others.**

Services as Barriers

Some services (especially those services targeted at 'disadvantaged groups') may act as a barrier to participation in society. For example,

- 'Special' Education; that is, where children with impairments are separated off from their peers.
- Segregated transport; for example Dial-a-Ride schemes.
- Social Services Day Centres and Residential Homes for disabled people only.
- Adult Training Centres for people with learning difficulties.

These services have developed historically because mainstream society has not been flexible enough to include some people. It is highly unlikely that officers within a service will think of their service as deliberately setting out to exclude people. It is more likely, there will be some attempt to bring about inclusion, and therefore **it is important for Best Value reviews to identify why services for specific groups exist, and the extent to which these services are challenging the causes of exclusion.**

It is important to distinguish between segregation that is imposed on people and the forms of self-organisation that people choose. For example, the existence of inappropriate care services may encourage ethnic minority communities to establish specific services that meet their cultural needs. Similarly, disabled people may wish to organise services for themselves that challenge the exclusionary nature of other forms of social organisation. **It should be an aim of Best Value Reviews to clearly identify the reasons for self-organised services.**

Models of Identity as Barriers

It is crucial that when we are examining services we identify which models of identity are embedded in the service – who are our customers, what makes them what they are, and what do they need? We also need to consider what alternative models there are, and whether or not they offer a better framework for service delivery.

Appendix 1 lists (in a very simplified form) some of the models of identity of women, black people, disabled people, lesbians and gay men, and people in poverty that can underpin policy and procedure.

Broadly speaking there are two models of identity, the individual and the social. The individual model tends to describe groups' exclusion as resulting from their physiological or psychological differences. The individual solution is to change the service user. Whereas the social model sees exclusion as the result of the failure of social organisation to change to accommodate difference. The social solution is to change the organisation.

It is tempting to say that one model is right and the other wrong – that there is evidence or proof for one but not the other. However, we must accept that most of us are not in a position to find absolute proof – to weigh one model against another and decide which is reality and which is myth. Nevertheless, some models of identity are invested with more power than other models because they become fixed into organisational policies, procedures and practices. They become *the* model of 'the customer', inform the nature, content, and approach to service provision.

It will be unusual for these models to be obvious, their existence will often underpin a service without it being spelt out. Therefore, Reviews should identify the implicit models embedded beneath the surface. For example, do employees talk about 'the special needs' of certain groups? Are services for black and ethnic minorities embedded in mainstream services or are they an add-on? Do front line staff 'specialise' in meeting the needs of certain groups, or does every one have some responsibility?

Barriers to Services

Barriers to services are those organisational features that can work to prevent groups and individuals from using the service.

Organisational barriers can include:

- inflexible timetables
- inaccessible information formats
- inaccessible communication formats
- inaccessible buildings and product design

1. Inflexible Timetables

Timetables synchronise activities within organisations. A timetable is the method by which events and activities are organised. All council activities are timetabled by hour or day or month or year.

Inflexible timetables will be a disabling barrier for those people who cannot function at the same speed as others (either because of impairment or the effects of other disabling barriers). Furthermore, timetables arranged around the Christian calendar might exclude people from certain minority ethnic communities. More often than not, the religions of black and minority ethnic communities are not even considered when timetables are devised in the first place. Similarly, organisational timetables are often constructed without taking into account those people with childcare responsibilities.

2. Inaccessible information formats

A format is the way in which information is presented. Formats include the spoken word, sign language, print, Braille, tape, videotape, and electronic media, such as e-mail. A format will be inaccessible if it is not appropriate to the functional requirements of people with impairments, or if it is not in a language that service users can use comfortably.

3. Inaccessible communication formats

Social communication is organised; such organised communication can include face-to face meetings, for example, committee meetings or interactions at reception points, and electronic communication, for example, telephone and video conferencing. A format will be inaccessible if it is not appropriate to the functional requirements of people with impairments.

Some minority ethnic groups will face a barrier if they are unfamiliar with the majority culture whose forms of organisation differ from their own (perhaps in terms of status distinctions or gender groupings).

4. Inaccessible built environments and product design

The built environment includes any building or construction; or approach to a building or construction; or, any open space that has been constructed (for example, landscaped areas). A built environment includes any fixtures, fittings or furniture within buildings.

Product design is meant to be a broad category that includes any manufactured product, from buses to computers to kitchen equipment. They will be inaccessible if they are not designed or laid out in a way that enables people to use them. For

example, stairs will disable a wheelchair user. People who live in larger family groups than the ethnic majority will face barrier a when housing offered by housing associations and local authorities is designed only for single people or small families.

Barriers experienced in the past

Barriers experienced in the past can continue to have an adverse effect. For example, those disabled people who attended segregated schools may have gained lower academic qualifications than their non-disabled peers, simply because their 'special' school failed to provide a proper 'mainstream' curriculum. People from ethnic minorities who have experienced racist stereotyping from the majority ethnic community may be reluctant to use services even when those services are adapted to meet their needs. Therefore, **services should be examined to see if they are taking any positive action to redress barriers experienced in the past.**

Summary

In short, when reviewing services we need to ask if the service itself is working to exclude or include people from wider society, if the model of our customers is inappropriate, and if there are any barriers to the service itself.

Knowledge and experience of organisational barriers

At the beginning of a Best Value Review, it will be important for the Review Team to identify what experience, knowledge and skills they have for identifying organisational barriers, and opportunities for removing them.

It might prove useful for a Review Team to use the following knowledge categories.

Personal Knowledge

Personal knowledge of discrimination is knowledge gained from experiencing organisational barriers at first hand. This knowledge is useful as it makes real what would be purely abstract ideas for those who have no direct experience.

Moral / Political Knowledge

Moral or political knowledge of organisational barriers involves an understanding of how and to what extent different groups are excluded by social organisation; and an understanding of the political processes required to bring about equality. This sort of knowledge can help identify the links between different experiences of organisational barriers.

Professional / Technical Knowledge

Professional or technical knowledge involves an understanding of those aspects of social organisation that can operate as barriers. For example, managers may have knowledge of inflexible timetables and the practical alternatives that can be employed to remove or reduce the effects of such inflexibility: architects and engineers may have the knowledge to remove physical barriers in the built environment.

Of course, in reality the different types of knowledge are not in neat packages, for instance, a disabled manager or a black manager may possess both personal **and** professional / technical knowledge. However, if a review is to pay anything but a tokenistic nod toward equality, at least two of the above knowledge categories must be available to the Review Team.

Equality Knowledge Available to a Service

These categories may also be useful for analysing what equality knowledge is available to the service under review. Such knowledge may be located in the workforce, and / or it may be located in community consultation mechanisms (for example, a service user forum). It will be important for the Review Team to identify not only the extent and location of such knowledge, but also the value the service places on such knowledge. The value placed on particular knowledge might be evidenced in its appearance in policy and procedure documents, appraisal processes, and service plans and targets.

Policy, Practice and not so common 'Common Sense'

In the past local authorities, including Sheffield City Council, addressed Equality issues by devising Equal Opportunities policies, that is politically informed intentions. Statements such as 'the council will provide an equal level to service all citizens', were common. Various forms of awareness training often accompanied these policies. It was then expected that employees would implement such policies in their day-to-day practice. However, we are beginning to realise that **'practice', the actual carrying out of tasks, is often dependent upon common sense – sound practical sense.**

Common sense is based on what a person learns or experiences and shares with others. **If a person does not experience something** (for example, using hearing aids and induction loops), **they will not have any common sense to draw on** when providing access for hearing aid users. In short, when presented with difference, common sense isn't that common.

Sheffield City Council's Equality Charter

Given the limitations of equality policies, Sheffield City Council has agreed a short statement of aims and objectives – The Equality Charter (Appendix 4.).

Reviewers will need to determine:

- If the Charter is known to employees throughout the service under review; and,
- If and how the Charter is used to inform service development.

Invisible Practice

Good equality practice, where it does exist, tends to be a one-off. For example, one employee with Deaf friends or relatives may have the common sense to operate induction loops or book BSL interpreters and her colleagues will become accustomed to her carrying out the tasks. But what happens when she is off ill or moves job or leaves the authority? The good practice goes with them. Furthermore, such individual practice often goes unnoticed in appraisals or other forms of supervision and there is no record of the actual methods or standards or service - it becomes invisible to the organisation.

In addressing these issues, **Sheffield City Council is beginning to realise the need for systematic information and guidance to enhance employees' common sense. Towards this end, it has been agreed to focus attention on the area that falls between policy and practice, that is, procedure and strategy.**

Procedures

Procedures are an essential organisational characteristic of local government. They are designed to shape, channel and guide the conduct of employees; particularly, to systematically calculate and co-ordinate resource allocation and distribution. Procedures thus are formal written instructions and/or guidance used to implement

policies. Although procedures are common in most service areas, they are sadly lacking in equality initiatives.

Equality procedures should aim to plug the gaps in 'common sense'. The identifying characteristics of a good procedure are:

- it provides durable and stable policy implementation;
- it explains the reasons for carrying out tasks and actions;
- it is widely available, and,
- it is supported by sources of further information and / or training.

A disadvantage of procedures is that they can become too rigid and inflexible; they can allow people to stop thinking independently. However, careful and systematic management can prevent stubborn adherence to the letter of procedures and encourage a reflective approach to the knowledge framework they provide.

Strategy

Where a wide area of organisational change is required, we will focus on strategies. A strategy is a formal written plan for addressing a specific issue. It should:

- contain a clear description and explanation of issue;
- identify specific actions to be taken within a specified timescale;
- identify who is responsible for implementing such actions; and,
- identify how such actions will be evaluated.

Check-listing

In order to get to grips with the underlying causes of inequality in service provision the Council has devised an Equality Checklisting and Target setting process. The Equality Checklist is a list of organisational strategies and procedures that can help to meet standards given in the Council's Equality Charter. The Checklist categories are based on the Commission of Race Equality's document '*Racial Equality Means Quality*'.

Each Head of Service was asked during 1998 / 99 to complete an equality checklist. Reviewer will need to determine

- If a checklist was completed;
- If the Checklist has been updated; and
- If the checklist is used to inform the equality targets given in the one-year service plans.

A summary of the Equality Checklist questionnaire is attached as Appendix 2.

Equality Targets

Each Head of Service is expected to produce a minimum of three Equality Targets as part of their annual service plan – either as projects / tasks or as measurable targets in the performance indicator section.

Following the Council's approach to 'Service Planning and Review', equality targets should be SMART, that is:

Specific
Measurable
Achievable
Realistic
Timed.

Best Value Review teams will need to:

- Identify the equality targets in the previous year's Service Plan and the current Service Plan.
- Assess the SMARTness of the targets; and,
- Assess progress

Best Value and Audit Commission Performance Equality Indicators for 2000 / 2001

The Best Value and Audit Commission Performance Indicators for 2000 / 2001 were published by the DETR in December 1999.

Whilst all indicators can be said to have equality implications, we have highlighted below those that are specifically directed at Black and ethnic minority people, disabled people and women.

When thinking about the significance of performance indicators like these, it is worth comparing them to a cartoon strip with the thought and speech bubbles left blank - the pictures are without meaning. Performance indicators need explanations; explanations of why and how the situation indicated is like it is. Such explanation can be provided by the approach given in this document.

Corporate Health BVPIs

Customers and the Community

| BV code | Indicator | Target | Definition |
|----------------|--|---------------|--|
| BVPI2 | The level of the Commission for Racial Equality's 'Standard for Local Government' to which the authority conforms. | Local | Sheffield City Council has not adopted the CRE Standard for Local Government. |
| BVPI3 | The percentage of citizens satisfied with the overall service provided their authority. | Local | Percentage of citizens stating that they are very or fairly satisfied with the way the authority carries out its duties. |

Corporate Health BVPIs

Staff Development

| BV code | Indicator | Target | Definition |
|----------------|--|---------------|---|
| BVPI11 | The percentage of senior management posts filled by women. | Local | To reflect the position as at 31st March 2001. Number of women in post at senior management level as a percentage of all staff in post at senior management level, where "senior management" is defined as the top three tiers of management in the authority. Exclude: authority staff in schools. |
| BVPI16 | The number of staff declaring that they meet the Disability Discrimination Act disability definition as a percentage of the total workforce. | Local | The Disability Discrimination Act 1995 states that: "a person has a disability for the purposes of this Act if he has a physical or mental impairment which has a substantial and long-term adverse effect on his ability to carry out normal day-to-day activities." Number of disabled staff, divided by the total number of authority staff x 100. Include: authority staff in schools. |
| BVPI17 | Minority ethnic community staff as a percentage of the total workforce. | Local | Number of minority ethnic community staff, divided by the total number of staff in the authority x 100. Use 2001 census classification. a. White British Irish Any other White background (please write in) b. Mixed White and Black Caribbean White and Black African White and Asian Any other mixed background (please write in) c. Asian or Asian British Indian Pakistani Bangladeshi Any other Asian background (please write in) d. Black or Black British Caribbean African Any other Asian background (please write in) e. Chinese or Other ethnic group Chinese Other "Minority ethnic community" means categories b, c, d or e above. Include: authority staff in schools. |

Corporate Health ACPIs

AC-A1a. The number of the authority's buildings open to the public.

Definition:

Buildings: buildings from which the local authority provides a service, of which at least a part is usually open to members of the public, but excluding public conveniences which are not integral to such buildings, and schools and educational establishments.

AC-A1b. The number of such buildings in which all public areas are suitable for and accessible to disabled people.

Definition:

'Accessible', 'suitable' and 'disabled people': as defined in Approved Document M of the Building Regulations 1991.

AC-A2a. The number of racial incidents recorded by the authority per 100,000 population.

Definition:

Racial incidents are any incidents regarded as such by the victim or anyone else. The indicator applies to all an authority's services including schools and to employment by the authority.

AC-A2b. The percentage of racial incidents that resulted in further action.

Definition:

Further action must be recorded in writing and would entail such things as:

- detailed investigations e.g. interviews with alleged perpetrator(s)
- referral to the police or other body (Commission for Racial Equality, Citizens Advice Bureau etc.)
- mediation
- warning to the perpetrator, which if oral must be recorded at the time
- relocation of the victim
- removal of graffiti.

AC-A3. The number of domestic violence refuge places per 10,000 population, which are provided or supported by the authority.

Definition:

Places means the number of rooms providing bedspaces for a woman and her children. Rooms not normally designated as bedrooms cannot be counted towards the total.

Figures should reflect the situation as at 31 March 2001.

If the authority part funds an establishment then it can claim credit pro-rata to its contribution to the facility's running costs. Support can be financial or in kind e.g. a building or staff.

Refuge means emergency accommodation for a woman and her children who have been referred for help having experienced threats to their physical safety and it must provide help, advice and advocacy support as well as being part of an integrated local approach involving partnership with other local and statutory bodies.

| |
|-----------------|
| Education BVPIs |
| Quality |

| BV code | Indicator | Target | Definition |
|---------|--|--------|--|
| BVPI43 | Percentage of statements of special educational need prepared within 18 weeks (a) excluding and (b) including those affected by "exceptions to the rule" under the SEN Code of Practice. | Local | Statements prepared within 18 weeks as a percentage of all statements (including those involving other agencies) but include cases where any of the exceptions listed in 3.40 to 3.42 of the Code of Practice apply. |

Education ACPIs

AC-B3 Pupils with statements of special educational need as a percentage of all children.

Definition:

Pupils with statements as defined by DfEE Form SEN2 (1999), Line 1.1 (e) on the date in 2000 / 01 on which this number is required to be returned to DfEE; as a percentage of the population aged 0-19.

AC-B4. The number of statements issued during the year per 1,000 children.

Definition:

Defined by SEN2 (1999), Line 2.1 (e) but figure required is for the financial year 2000/01 not the calendar year.

Social Services BVPIs

Quality

| BV code | Indicator | Target | Definition |
|----------------|---|---------------|--|
| BVPI57 | Users / carers who said they got help quickly. (PAF D36). | Local | Percentage of people surveyed who said that they felt that they received the help they needed quickly. (PAF D36). This will be obtained from user satisfaction surveys to be carried by LAs. |
| BVPI58 | Percentage of people receiving a statement of their needs and how they will be met. | Top quartile | PAF (D49) The number of adults getting a service in 2000/2001 who have received by 31 March 2001 a description of what their needs are so far as those services concerned and how those needs will be met; divided by the total number of people receiving those services. There should be one percentage for this indicator. |

| BV code | Indicator | Target | Definition |
|----------------|--|---------------|---|
| BVPI60 | Users / carers who said that matters relating to race, culture or religion were noted. | Local | The percentage of people surveyed who said that they felt that matters relating to race, culture or religion were taken into account by social services in the provision of the help they needed. (PAF E46) This will be obtained from user satisfaction surveys to be carried by LAs. |

Housing ACPIs

AC-D1 Does the authority follow the Commission for Racial Equality's code of practice in rented housing?

Definition:

'Following the code' must include adherence to all the code's recommendations except those relating to employment practices, including procedures for dealing with racial harassment and reporting the results of ethnic monitoring to a committee of the council. 'The code' is the Commission for Racial Equality's Code of Practice in Rented Housing.

Housing Benefit and Council Tax Benefit BVPIs

Quality and fair access

| BV code | Indicator | Target | Definition |
|----------------|---|---------------|---|
| BVPI80 | User satisfaction survey covering issues of accessibility, staffing issues (helpfulness etc) and communications/ information (understandability etc). | Local | Percentage stating that they strongly agree / disagree with each of the following statements (only calculated for those that have used these services): <ul style="list-style-type: none"> •Overall I am satisfied with the facilities to get in touch with the benefits office •Overall I am satisfied with the service in the actual office •Overall I am satisfied with the telephone service •Overall I am satisfied with the staff in the benefits office •Overall I am satisfied with the clarity and understandability of the forms, leaflets and letters •Overall I am satisfied with the amount of time it took them to tell me whether my claim was successful For each of the above the data should be presented for: |

| BV code | Indicator | Target | Definition |
|---------|-----------|--------|--|
| | | | <ul style="list-style-type: none"> •Overall satisfaction of all respondents; •Satisfaction of those whose claim was successful; •Satisfaction of those whose claim was not successful. <p>An indicator measuring customers' views of three key aspects of service delivery:</p> <ul style="list-style-type: none"> •Access: (e.g. access to the office, : ease of travel to offices, opening hours, condition of the waiting area, waiting times, privacy; access by telephone: availability of direct lines, waiting time to answer, waiting on hold, being 'passed around') •Staff (e.g. one named contact, politeness, helpfulness) • Communications / Information (e.g. clarity – spoken and written (including benefit notifications), adequacy and timeliness of information, ease of completing new and renewal claim forms). |

Transport ACPIs

AC-F1 The percentage of pedestrian crossings with facilities for disabled people.

Definition:

Only include zebra, pelican, puffin and toucan crossings, and traffic lights with a pedestrian phase. All crossings at a set of traffic lights or at a roundabout should be counted as one crossing. All crossings at one large roundabout with a series of mini-roundabouts should likewise be counted as one crossing.

Facilities for disabled people: to qualify, all the approaches to a crossing should have dropped or flush kerbs and tactile surfaces, and in the case of pelican, puffin and toucan crossings and traffic lights an audible or tactile indicator that it is safe to cross the road.

Planning BVPIs

Quality

| | | | |
|---------|------------------------------|-------|--|
| BVPI112 | Score against a checklist of | Local | There is a proposed quality checklist of 10 questions. The checklist is drafted so that each question requires a 'Yes' or 'No' answer. A 'Yes' answer attracts a score |
|---------|------------------------------|-------|--|

| | | | |
|--|-------------------------|--|---|
| | planning best practice. | | <p>of 1. Question 10 FAIR ACCESS. Have you implemented a policy for ensuring that different groups have equal access to the planning process including, as necessary, the provision of advice in ethnic minority languages and in Braille/ on tape based on consultation with relevant members of the community about the accessibility of the planning service, and do you have arrangements for keeping this policy under review?</p> <p>Note: Authorities should consider how accessible the service they provide is to different groups in the population such as ethnic minorities, religious groups, elderly and disabled people and disadvantaged and deprived people in inner urban areas.</p> |
|--|-------------------------|--|---|

Cultural and Related Services BVPIs

Fair Access

| BV code | Indicator | Target | Definition |
|---------|--|--------|---|
| BVPI119 | Percentage of residents by targeted group satisfied with the local authority's cultural and recreational activities. | Local | Percentage of women respondents fairly satisfied or very satisfied with cultural and recreational facilities and activities. Percentage of minority ethnic community respondents fairly satisfied or very satisfied with cultural and recreational facilities and activities. |

User Satisfaction Performance Indicators

General survey

BVPI3 is "The percentage of citizens satisfied with the overall service provided by their authority". The definition for this indicator will be the "percentage of citizens that are very or fairly satisfied with the way the authority carries out its duties".

The requirements for this survey will be:

- Target population: all local authority residents
- Sampling frame: Postcode Address File (PAF)

- Questions: prescribed set of standard questions and categories
- Method of sampling: probability sampling
- Output: confidence interval +/- 3%
- Sub-groups: questions should allow for analysis by sub-groups and there are suggestions to include questions on gender, age, employment status, occupation/social class, ethnicity, disability.
- Time of year: anytime between September and end of November
- Timing: minimum every 3 years, starting in 2000
- Calculating the rating: % very or fairly satisfied with the way the authority runs things. Figures should be provided for all respondents; breakdown by ethnic origin; breakdown by gender
- Data collection: postal. In that large numbers of local authorities have established citizens panels, this will be an acceptable group to use for the general survey, provided that the panel has been drawn using probability sampling.
- All authorities will be asked to send a data file to the Local and regional Government Research Unit at DETR with anonymised responses.

Guidance will be produced by DETR in Spring 2000.

Other service surveys

In addition there is guidance on user satisfaction for:

1. Council tenants survey
2. Benefits survey
3. Planning survey
4. Libraries survey

Sub-Groups

Estimates for the subgroups of the population (age, gender, ethnicity, social class, disability, geographical location and so on) are desirable because they will allow authorities to examine the impact of the service on a given population subgroup. However, the government is not going to ask authorities for a standard precision of estimates for these social subgroups at this stage. Instead, each survey will be required to ask questions around these issues. For comparability across authorities and for authorities to be able

to check the representativeness of their survey responses, all surveys will be required to contain questions on gender, age, employment status, occupation, ethnicity, disability and postcode. For most surveys the local authority will know the postcode of the respondent, therefore a question on postcode only needs to be asked in the library survey.

The DETR recommends some questions which have been used in many nationally representative postal surveys and those that are proposed in the '2001 Census of Population' white paper (March 1999). However, Sheffield City Council will use its own definition of disability.

Authorities are also encouraged to ask more questions on socio-economic issues if they consider that their specific local circumstances deem it necessary.

| | |
|--|--|
| User Satisfaction Performance Indicators | |
| Social subgroups for all surveys | |
| Recommended questions for postal questionnaires (these will need to be altered slightly if other methods of data collection are being used (provided that the same categories are covered). Note: the definition of disability is based Sheffield City Council's Disability Discrimination Act policy. | |

| Minimum Requirement | Questions |
|---------------------|----------------------------------|
| Gender | Are you male or female? |
| Age | What was your age last birthday? |

| Minimum Requirement | Questions |
|-----------------------------|--|
| Employment | <p>Which of these activities best describes what you are doing at present? (please tick one only – only tick 'looking after the home' if this is your main activity and none of the other options apply).</p> <p>Employee in full-time job (30 hours plus) Employee in part-time job (16- 30 hours) Self employed full or part-time On a government supported training programme (e.g. Modern Apprenticeship / National Traineeship / Training for Work / Adult Training) Full-time education at school, college or university Unemployed and available for work Unable to work because of disabling barriers. Wholly retired from work Looking after the home Doing something else (please write in)</p> |
| Occupation/ social class | What is / was your occupation? (please write in) |

| Minimum Requirement | Questions |
|--------------------------------|--|
| Ethnicity | <p>To which of these groups do you consider you belong?</p> <ul style="list-style-type: none"> a. White <ul style="list-style-type: none"> British Irish Any other White background (please write in) b. Mixed <ul style="list-style-type: none"> White and Black Caribbean White and Black African White and Asian Any other mixed background (please write in) c. Asian or Asian British <ul style="list-style-type: none"> Indian Pakistani Bangladeshi Any other Asian background (please write in) d. Black or Black British <ul style="list-style-type: none"> Caribbean African Any other Asian background (please write in) e. Chinese or Other ethnic group <ul style="list-style-type: none"> Chinese Other (please write in). |
| Disability | <p>Do you have an impairment? ('Impairment' means an injury, illness, or condition that you were born with, which causes a loss of, or difference in, your bodily or mental functions). Yes / No</p> <p>Are you disabled? ('Disabled' means you are prevented from taking part in society on an equal level with others due to social and environmental barriers – for example, inaccessible buildings or information, or prejudice). Yes / No</p> |
| Postcode (library survey only) | Postcode (please specify) |

Consulting the Local Community

Reviews will need to... engage with users and potential users of services. A customer focus to Reviews is essential. It is important that authorities seek out the views of all potential users, especially those who have traditionally been under-represented. Those that fail to engage local people fully from the outset - including hard-to-reach groups - will carry little conviction when it comes to explaining decisions on service targets and selected providers, and invariably overlook real opportunities to bring about lasting change. (Implementing Best Value – A Consultation Paper on Draft Guidance - DETR September 1999)

Several methods of consulting users are available, including:

- focus groups - small groups of people whose views can be examined in depth;
- surveys - personal interview, telephone interview or self-completion questionnaire;
- public meetings.

The use of any or all of these methods will be a complete waste time and resources if the description and construction of the issues and problems that the council is seeking involvement with are not thought about very carefully.

Imposition of Meaning

When you involve people in policy making it is worth remembering that the truth is not out there. All inquiry imposes a frame of reference onto the subject matter. The way a topic is written will, directly or indirectly, shape opinions. People will have to orientate themselves to the topic and locate their experiences within it. This isn't to say that people will simply follow the line presented by a local authority – the consultation process may encourage them to react against it – but even such reaction is a shaper of opinion.

The City Council has an important role to play in reconciling or balancing interests and giving leadership. We need to recognise and encompass difference - in contrast to the all too common tendency to uniformity. We would argue that to do this, we must recognise our power as constructors of social reality and systematically build minority knowledge into the topics and the processes of involvement.

Before you Start

Before embarking on any new consultation, it will be important that you find out what is already happening. Find out which other services are carrying out Best Value Reviews: could you work together? Also, look to other areas of work that will give you an indication of what people think of services. For example, look at the complaints that have been received, is there one or two particular issues that regularly crop up? Talk to front line staff who are routinely in contact with the public. Involve the elected members, especially the ward Members in the particular locality that you are working. Make sure that they are aware of what you are going to consult

on and when you are planning to do it. Keep them fully informed in case they are asked questions.

Terms of Reference

A useful way of planning consultation is to draw up detailed terms of reference at the outset. This task, although time consuming, can: clarify meaning, encourage transparency of decision making, and enable people to decide whether or not it is worth their while committing time and energy to your review. Appendix 3 contains some example headings that can be used.

Appendix 1. Representing Marginalised Groups

These notes outline in a highly simplified way how models can represent marginalised groups.

Women / Gender

| Individual Model | Social Model |
|--|---|
| <p>The view is that biology (anatomy and reproductive function) determines female and male behaviour, personality and abilities. Such behaviour, personality and abilities are said to reflect natural superiority and inferiority, which in turn are used to explain and justify social exclusion. It also promotes the view that in order to be accepted individual women should conform to the chosen male order and 'masculine' behaviour.</p> | <p>Gender is the social aspect of the relations between the sexes and as such, it should be distinguished from sex. Gender is constructed and expressed in many areas of social life reflecting assumptions about how society operates and how jobs, resources and positions of authority are allocated. This affects the way in which individuals view themselves.</p> |

Disabled People

| Individual Model | Social Model |
|--|---|
| <p>The most widespread understanding of disability is one that asserts that disability is ultimately reducible to the individual person and her or his impairment. This notion is currently reflected in the definitions provided by the World Health Organisation (WHO) and the Office of Population Census and Surveys (OPCS). Such official definitions can be summarised as: impairment - an abnormality in function, disability - not being able to perform an activity considered normal for a human being, and handicap - the inability to perform a normal social role.</p> | <p>A social model of disability describes impairment and disability as follows. A disabled person is a person with an impairment who experiences disability. Impairment is an injury, illness, or congenital condition that causes or is likely to cause a long-term effect on physical appearance and / or limitation of function within the individual. Impairment neither causes nor justifies disability. Disability is the loss or limitation of opportunities to take part in society on an equal level with others due to social and environmental barriers. For example, an impairment (spinal injury) may cause functional limitations (inability to walk), however; the disability would be the effects on the person's mobility of environmental barriers, such as steps into buildings.</p> |

Ethnic minority people

| Individual Model | Social Model |
|--|---|
| <p>Groups or, 'races', are defined by physiological characteristics: for example, IQ; skin colour; facial features, and brain size. Behaviour, skills and abilities are, in turn, said to be determined by such physiological details. This approach often promotes ideas of natural superiority and inferiority to explain and justify social exclusion.</p> <p>This Model promotes the view that, in order to be accepted, it is the responsibility of individuals to learn new customs, and ways of behaving.</p> | <p>The word 'race' is a term of limited usefulness. It should only be used to describe physical characteristics. It has no relevance to the explanation of political and cultural differences between human beings. Ethnicity is more useful; it refers to such things as being born into a particular religious community, speaking a particular language or even a dialect of a language and following particular social practices.</p> <p>Confusingly the word 'racism' refers to sets of discriminatory practices and institutions that favour one ethnic group over another.</p> |

Lesbians and Gay Men

| Individual Model | Social Model |
|--|---|
| <p>There is a view that desire for the same sex is a chosen sin, or a failure to develop or replicate sex / gender norms, or, a mental or psychological disease, or a form of social deviance.</p> | <p>Sexuality is a social construction and not a biological certainty. Homophobia is discrimination by intent and design. Heterosexism is discrimination by neglect, omission and / or distortion. It is the system by which heterosexuality is assumed the only acceptable life option. This assumption of heterosexuality as a social norm forces lesbians and gay men to struggle against prejudice within society to develop a positive sexual identity. Though heterosexism is a form of discrimination, its subtlety makes it insidious because it is hard to define and combat.</p> |

People living in poverty

| Individual Model | Social Model |
|------------------|--------------|
|------------------|--------------|

| Individual Model | Social Model |
|---|--|
| <p>Human needs are interpreted as being physical needs, that is, for food, shelter and clothing. Individuals and families will be in poverty if their incomes are not sufficient to obtain the minimum necessary for the maintenance of physical efficiency.</p> <p>The poor (or at least significant sections of the poor) are portrayed as a so-called underclass. The underclass is seen as qualitatively different from the rest of society. For example, poor single parents or the long-term unemployed have a different set of values and live by a different set of standards than the rest of the population, they are unable to control their children or provide a stable and loving environment, they have rejected the work ethic and prefer a life on benefits.</p> | <p>The European Council of Ministers has agreed the following definition of poverty.</p> <p>“Individuals, families and groups are considered to be in poverty if they lack, or are denied resources (material, cultural and social) which exclude them from participating fully in the life of the community or from having equal access to education, employment, health care, leisure and social activities, good housing and adequate food and clothing.”</p> <p>Poverty is compounded by discrimination. People who are discriminated against are more likely to experience poverty and to be further discriminated against and excluded because they are poor. Older people, lone parents, women, people without employment, children in households with no one in work, members of black and ethnic minority communities, disabled people are some of the groups who have a greater risk of poverty.</p> |

Appendix 2. Equality Procedures Checklist

Area i. – Equality Structure and Contracting

Equality Structures

- An Equality Structure that can be used to implement Service Plan Equality Targets (e.g. an equality task team).
- Written procedures for describing the implementation of the Council's Equality Charter as task(s) in the job descriptions of:
 - Senior management
 - All managerial staff
 - Front-line delivery staff
- Procedures for ensuring that tasks related to implementing the Equality Charter are subject to a formal appraisal procedure.

Information for Employees

- Written procedure for providing copies of the Council's Equality Charter to all staff, applicants and new recruits.
- Written procedures for providing information to employees about their responsibilities under the Council's Equality Charter.
- Written guidance available to managers on sources of information and support in relation to equality issues.

Contracting

- Written procedures for giving guidance to applicants for contracts on how to meet the Council's Equality Charter.
- Written procedures for taking action against contractors who breach their contract by failing to comply with the Equality Charter

Area ii - Service Delivery

- Written procedure(s) for monitoring the take-up of services that identify the following groups:
 - Disabled people
 - Women
 - Minority ethnic communities
 - Lesbians and gay men
- Written procedure(s) for monitoring the take-up of services that identify the following income categories:
 - Benefit Status
 - Employment Status
 - Age
 - Student
 - Lone parent

- Written complaints procedures that are available to service users.
- Written procedures for monitoring complaints of discrimination against service users by employees.
- Written procedures for offering service users the opportunity to have a woman or ethnic minority officer deal with enquiries.
- Written procedures that contain specific instructions or guidance for accommodating the diverse cultures within the population of Sheffield.
- Written procedures for ensuring that your service treats lesbian and gay partners on the same basis as heterosexual partners / married couples.
- Written strategy for improving access to the buildings.
- Written records or a database containing the access details of buildings. Access details available to members of the public
- Written procedures for ensuring that public events and meetings your service organises are accessible to the people they are aimed at (For example, location of venue, access to venue, times, child care facilities, transport, types of refreshment, etc.).
- A strategy for providing the following in your public reception areas:
 - Baby feeding and nappy changing facilities
 - Access for prams / pushchairs / buggies
- Facilities for young children (for example, the provision of play areas)
- Written strategy for identifying, recording and removing organisational barriers to your services.
- A strategy for ensuring that staff who deliver services are trained to recognise organisational barriers to their services.
- Charging policies that identify and take positive action for the following income categories:
 - Benefit Status
 - Employment Status
 - Age
 - Student
 - Lone parent

Area iii. - Partnership Working

Funding Community Organisations

- A policy to guide voluntary sector funding priorities that formally prioritises organisations controlled by:
 - Disabled people
 - People from ethnic minorities
 - Women
 - Lesbians and Gay Men
 - Individuals in poverty

- Written procedures for reviewing your criteria for voluntary sector funding to ensure they do not discriminate against particular sections of the population.

Information

- Written procedures for supplying information on the decision-making processes.

Consultation

- Written strategy for consulting with community organisations.

Equality Events

- Written strategy for organising, publicising and celebrating equality events.

Area iv. - Communication

Paper

- Written strategy for implementing the council's Plain Language and Clear Print Standards.
- Written procedures for providing accessible information about services.
- Written strategy for providing information on British Sign Language (BSL) Video.

Voice

- Written procedure(s) for providing Human Aids to Communication and Community Language Interpreters.
- Written procedures for publicising your Directorate's TypeTalk account number to staff.
- Number of Minicoms.

Appendix 3. Terms of Reference for Best Value Consultation

Depending on the methods chosen, terms of reference for the consultation might contain some or all of the following elements.

Background

- Explain the purpose of Best Value reviews. Tell people what you want to know and why you want to know it.

Conceptual Framework

- What is the problem? How has it been constructed? Does the service include or exclude? What models of identity are to be used?

Aims and Objectives

- What will be different at the end of the process? What will the involvement of people lead to – a new policy, changed organisational structures, new ways of working?

Organisational Constraints

- What are the constraints on the process that may limit you? (For example, legislation, budget and political sensitivities).
- Will those involved be expected to refrain from using your process to raise individual complaints about service providers – if not, what alternative ways of dealing with complaints will be used?
- What will you do if some of the opinions expressed by those consulted run counter to the core values of the council? Will these opinions be challenged? Will they be recorded but ignored? Will they be acted on? Will the council agree with them?

Timetable

- Set dates for completion.
- Which of the council's decision-making processes apply in the circumstances (for example, Committee and Management Team schedules)?

Support for members

If a Council aims to attract people who face systematic discrimination – it will need to take into account how such systematic discrimination often manifests itself. For example:

- Some people do not have access to information.
- Some people do not have access to the culturally determined social skills often required to articulate their opinions.

This may mean giving people time and support to gather and understand the information required and / or to find ways of expressing their opinions.

Who is to be involved?

A number of individuals and groups may need to be involved. You will need to identify who as well as how this will be done.

When trying to involve people in consultation, local government officers often strive to construct a 'representative sample'. It is believed that the following mix of people will provide a true picture of peoples' views.

- Representatives from across the district.
- Representatives from all ethnic minorities.
- Representatives from all social classes.
- Representatives from as wide a range of impairment groups as possible.
- Representatives from all age categories.

The problem is that, at best, this type of approach can only identify superficial physical, economic and social characteristics. On its own, it cannot identify knowledge or understanding.

An alternative way of considering representation is to make sure that minority knowledge is represented. Therefore, you may need to request that participants have some knowledge and experience of specific organisational barriers.

Payment

People have often freely given their time and effort to get involved in consultation. It might be an idea to actually pay people for this, as it will encourage a degree of commitment and discipline. Furthermore, it is well known that local authorities seem to be less likely to ignore something they have paid for.

- What will be the rate? How will it be calculated?
- Can those whose income is restricted by the benefits system request that their allowances be made payable to their organisations?

Access

It is essential that the access requirements of methods of involvement are identified. Depending upon your chosen method(s), some or all of the following commitments in can be included in the terms of reference:

- Meetings will be held in wheelchair accessible venues.
- Meetings will be held in safe venues that are accessible by public transport.
- Crèche facilities will be provided.
- Meetings will be run in such a way as to include all those people in attendance.
- Appropriate Human Aids to Communication (HACs) will be provided at all meetings where requested.
- Plain language will be used in all information.
- Printed material will be provided in appropriate formats (for example, Braille, tape and large print, community languages) where requested.
- Travelling expenses to and from recognised meetings will be met for those disabled members who are prevented from using public transport by disabling barriers.
- Those disabled members who require a personal assistant to overcome disabling barriers whilst attending meetings will be reimbursed. Payment will include travelling time to and from meetings.
- Designated parking bays will be provided for disabled members at all meetings.

Administration

- Who will be responsible for the administration of the process?

Evaluation

- How will the success of the involvement be measured?

Publication

- What are the plans for feeding back to everyone involved? Remember, there are those for whom written reports, newsletters etc. will not be accessible.

EQUALITY CHARTER

Sheffield City Council

believes that all its citizens should have equal access to the means to achieve a decent quality of life.

It recognises that poverty, disadvantage, deprivation and discrimination prevent this happening.

The Council will use the power, resources and influence at its disposal to overcome these barriers and promote equality as one of its fundamental values.

WORKING TOWARDS EQUALITY

AIMS AND OBJECTIVES

When it plans and makes policy the Council will endeavour to ensure that:

- The diverse requirements of the citizens of Sheffield are systematically included in the planning and review of services.
- All employees, service users, contractors and community organisations with which it comes into contact, are made aware of the aims of this charter.

In service delivery and customer care, the Council will endeavour to ensure that:

- Its services are relevant to the needs of the people of Sheffield.
- Service users are treated in a way that does not unfairly discriminate on the grounds of sexual orientation, race, disability, sex or age.
- Complaints of harassment, discrimination and victimisation, and other breaches of policy and procedure, will be taken seriously in order that services can be improved.
- Information about services is clear, accurate and accessible to all.
- Those buildings open to the public are fully accessible.

In promoting equality, Sheffield City Council will endeavour to ensure:

- Its equality policy is publicised and marketed widely and positively.
- The involvement of Sheffield's diverse communities in local authority public events is encouraged.

- It promotes the diversity of cultural events within the City.
- It is seen as a standard setter for equality.

In community development, the Council will endeavour to ensure that:

- It actively consults with all sections of the population of Sheffield.
- There is an active partnership between the community and the Council in the planning and delivery of services.

- It continues to support the self-organisation of those people experiencing the greatest disadvantage and discrimination.

- It encourages community involvement in processes and structures of the local authority.

In employment, the Council will endeavour to ensure that:

- Through its personnel policies, procedures and practices, it enforces the spirit of the equality legislation.
- Positive steps will be taken to encourage job applications from under represented sections of the population.
- There are increased opportunities for all staff to develop in the organisation.
- All staff can take the opportunity to contribute ideas and suggestions for improving services and ways of working.
- Complaints of harassment, discrimination and victimisation will be taken seriously, and breaches of policy and procedure will be met with appropriate action.

Progress towards the achievement of these Equality Standards will be

formally evaluated each year.

Best Value Notes 6