



MANCHESTER
CITY COUNCIL

A Review of Manchester City Council's Approach to Workforce Race Equality

**David Codner – Equality, Diversity and Inclusion
Consultant**

Contents	Page Number
1 Introduction	3
1.1 The purpose of this Report	3
1.2 The Review Team	3
1.3 The Commissioning of this Report	3
1.4 Acknowledgements	4
2 Methodology	5
2.1 Methodology Overview	5
3 Review Findings	7
3.1 Workforce Composition	7
3.2 Employee Relations Data and Other Issues	11
3.3 Casework Review	13
3.4 Stakeholder Engagement	15
3.5 Policy Framework	22
3.6 Recruitment and Selection	26
3.7 The Training Offer	26
3.8 Mainstreaming EDI and Race Equality	27
4 Conclusions	29
4.1 The Experiences and Views of BAME Council Staff	29
4.2 Mainstreaming EDI and Race Equality	29
4.3 Action and Improvement	30
5 Appendix 1 - List of Recommendations	32
Appendix 2 - Mainstreaming EDI Model	35

1 Introduction

1.1 The purpose of this Report

- 1.1.1 This report sets out the findings and makes recommendations from a review of Manchester City Council's approach to workforce race equality.

1.2 The Review Team

- 1.2.1 Both David Codner and Mags Bradbury were jointly commissioned to undertake this review. Mags Bradbury undertook the review of a Whistleblowing case. David Codner undertook the review of workforce race equality. The outcomes of the Whistleblowing review are separate to the review of workforce race equality and are not detailed here.
- 1.2.2 David Codner is an Equality, Diversity and Inclusion (EDI) expert and a specialist in race equality with more than thirty years' experience in this area. He has worked within the voluntary and community sector, local government and the NHS during his career; undertaking senior roles as either the EDI or race equality lead in the majority of organisations that he has worked in. David is currently an EDI Manager in the NHS and is an EDI consultant.
- 1.2.3 Mags Bradbury is currently the Associate Director – Employee Wellbeing, Inclusion and Community in the organisation that she works in. Mags has worked in organisational change and inclusion in both the public and private sector. She currently manages the portfolio of equality and diversity, widening participation, community partnership and employee health and wellbeing at Manchester University Foundation NHS Trust, including the Trust Freedom to Speak Up Programme.

1.3 The Commissioning of this Report

- 1.3.1 Manchester City Council has had a publically stated commitment to equality and diversity since the 1980s. This includes a commitment to race equality. Over this period the Council has actively pursued race equality. However in recently years this commitment has been questioned by some Black, Asian, and other ethnic minority (BAME) staff within the Council and one of the staff trade unions. The Unite trade union as also made an assertion that the Council is institutionally racist when it comes to the Council's approach to workforce race equality. In part this review was commissioned to examine this assertion.
- 1.3.2 The following definitions of institutional racism were used within this report in considering this assertion:

“The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture, or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination

through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people."

The Macpherson report

"Institutional racism is that which, covertly or overtly, resides in the policies, procedures, operations and culture of public or private institutions - reinforcing individual prejudices and being reinforced by them in turn."

A. Sivanandan, Director, Institute of Race Relations

"If racist consequences accrue to institutional laws, customs or practices, that institution is racist whether or not the individuals maintaining those practices have racial intentions."

The Commission for Racial Equality

Each of the definitions has a difference in emphasis in terms of organisational considerations.

- 1.3.3 The report was commissioned by Manchester City Council in April 2019. The report was completed in November 2019 and presented to the Council. At the beginning of the review a total of 13 days were allocated to the completion of the review and the production and presentation of the report.
- 1.3.4 The commissioning process was led by the City Solicitor who is also the Senior Management Team (SMT) lead for Equality, Diversity and Inclusion and supported by the Head of Workforce Strategy and the EDI Manager within the Council.
- 1.3.5 The report findings will be presented to the Council via a panel of:
 - the Executive Member for Finance and Human Resources
 - the Executive Member for Neighbourhoods (whose responsibilities include equalities and community cohesion)
 - the Deputy Chief Executive & City Treasurer
 - the City Solicitor (SMT EDI Lead)
 - the Interim Director of Human Resources and Organisational Development
 - EDI Manager

1.4 Acknowledgements

- 1.4.1 I would like to thank all the Manchester City Council Members and staff who:
 - Provided information and data that contributed to the findings of this report
 - Participated in the workshops, for their time and honesty
 - Met with the review team, spoke of their experiences and provided their views.

2 Methodology

2.1 Methodology Overview

- 2.1.1 The review used a number of methods to examine the issues that the review brief had stated. Both quantitative data was examined and qualitative data was gathered for the purpose of this review. There was also engagement with a number of stakeholders within the Council. Qualitative data was used mainly to understand the experiences of some of the Council's BAME staff and to gain and analyse the views of various stakeholders including a selection of BAME staff.
- 2.1.2 Given the time constraints and available data, it was not possible to examine the detailed experiences of all BAME staff within the Council. Instead, the review took account of over 50 individual stakeholders as described further in this report. The report therefore acknowledges that the accounts, experiences and views given are those of a relatively limited proportion of the Council's BAME workforce. Whilst these may not necessarily be representative of all BAME Council staff's views and experiences, they are considered by this review to be broadly indicative and are presented here as conveyed by the individuals engaged in this review process.
- 2.1.3 The constraints of the review also prevented the findings from being triangulated with all other relevant sources of information, such as the outcomes of the B Heard staff survey. As such, this should be considered to be a stand-alone review with the outcomes reported here based solely on the methodology described in this report. Consideration of and triangulation with other sources of relevant information may be helpful to the Council when interpreting these review findings.

Workforce Data

- 2.1.4 Data in relation to the ethnic composition of the workforce was examined in a variety of ways to understand where BAME staff are in the workforce, regarding their distribution across Directorates / services and across salary grades. Additionally data was also reviewed in terms of employee relations activities in the Council. Both disciplinary and employee dispute resolution data was examined to understand the levels of disciplinary action being taken against BAME Council employees and the nature of grievances being raised in the Council by BAME staff.

Council Policies

- 2.1.5 A range of Council employment related policies were examined to determine if the Council had a robust policy framework in place to advance workforce race equality. Policies were examined in detail for both content and their operation. A gap analysis was also undertaken.

Employment Casework

- 2.1.6 A review of a sample of recent employee relations casework was undertaken. The casework review focussed on disciplinary cases involving both BAME and white staff. This was done so it could be assessed if there had been any differential treatment on

the basis of race/ethnicity. The casework review also examined a sample of employee dispute resolution cases to understand the types of issues that BAME staff were aggrieved about in comparison to their white colleagues.

Stakeholder Engagement

- 2.1.7 A number of stakeholder engagement activities formed part of this review. A selection of BAME staff were engaged through two workshops. Staff from the trade unions black members groups (Unison and Unite) attended the first workshop. Staff from the Council's black members' staff networks attended the second workshop. Both workshops discussed the same issues. The workshops were designed to understand the participants' experiences and / or views of what it is like to work for the Council as a BAME member of staff and to also understand participants' views of the Council's workforce race equality work.
- 2.1.8 Two workshops were held to focus on the importance that the Council places on its equality, diversity and inclusion (EDI) work including workforce race equality. There was a particular focus on how "mainstreamed" EDI work is in the Council (the extent to which equality considerations are embedded and mutually owned in the exercise of all Council functions, including employment) and does workforce race equality have the same importance? The first workshop was held with a selection of Human Resources and Organisational Development (HROD) staff. The second workshop was held with the Council's EDI Champions.
- 2.1.9 All workshop participants were asked to rate "How important is race equality in the Council?" Participants were asked to answer based on how important they perceive it to be in practice, not how important they think it should be.
- 2.1.10 There were also a number of meetings with individuals. The meetings were with:
- Executive Member for Neighbourhoods - Councillor Rabnawaz Akbar, whose responsibilities includes equality, diversity and inclusion.
 - The Lead Member for Race - Councillor Ahmed Ali
 - Fiona Ledden – City Solicitor (and Senior Management Team EDI lead)
 - Helen Grantham – interim Human Resources and Organisational Development Director
 - Sam McVaigh – Head of Workforce Strategy
 - Sohayalla Wilson – Unite Union (NB: all recognised trade unions were invited to engage in the review)
 - Members of the EDI Team

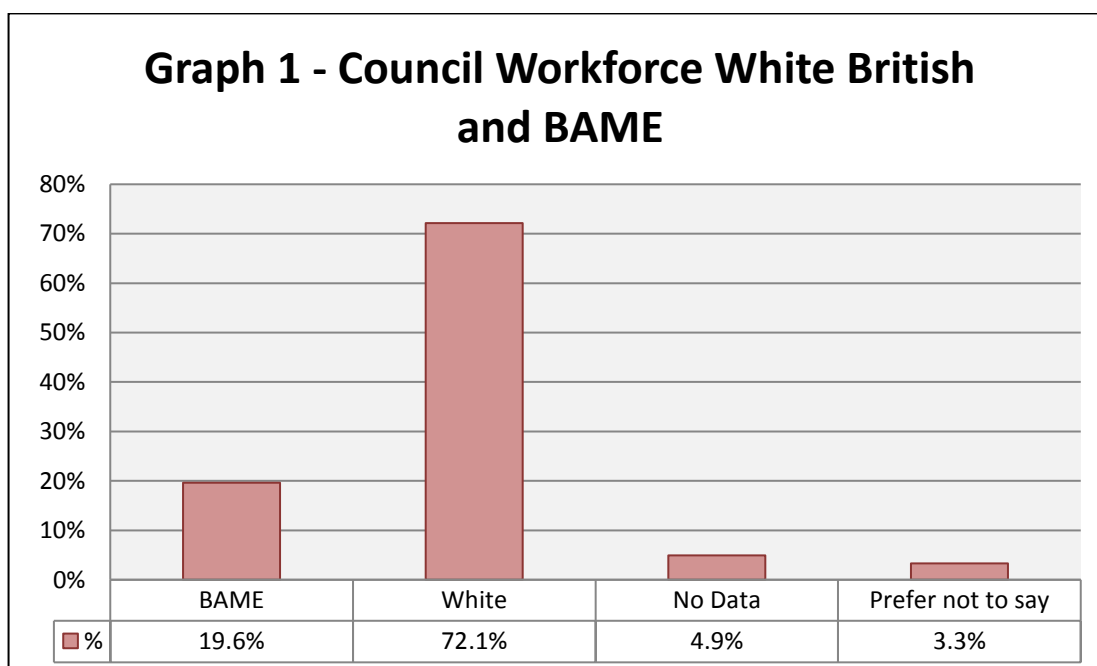
Observations

- 2.1.11 In addition to the above methods being used a number of observations were made by the review team.

3 Review Findings

3.1 Workforce Composition

- 3.1.1 The City Council has an ethnically diverse workforce, as does the city of Manchester. The 2011 Census recoded that the non-white population of Manchester was 33.3%. Within the working age population this will be higher as the Black, Asian and other Ethnic Minority (BAME) communities have a younger age structure compared to the rest of the population. Since the last Census the ethnic composition of the City is likely to have changed and this percentage is likely to be higher.
- 3.1.2 As of May 2019, 19.6% (1,419 staff) of the Council's workforce were from BAME backgrounds and its white British workforce was 72.1 %. Graph 1 (below) has further details. There is also a considerable proportion of staff (8.2%) where the Council has no ethnicity data about them.
- 3.1.3 It has been the practice of the Council when presenting workforce ethnicity monitoring data to remove staff that the Council has no data about from the analysis. This has the effect of increasing the proportion of BAME and white British staff in the workforce. This will not necessarily be accurate.



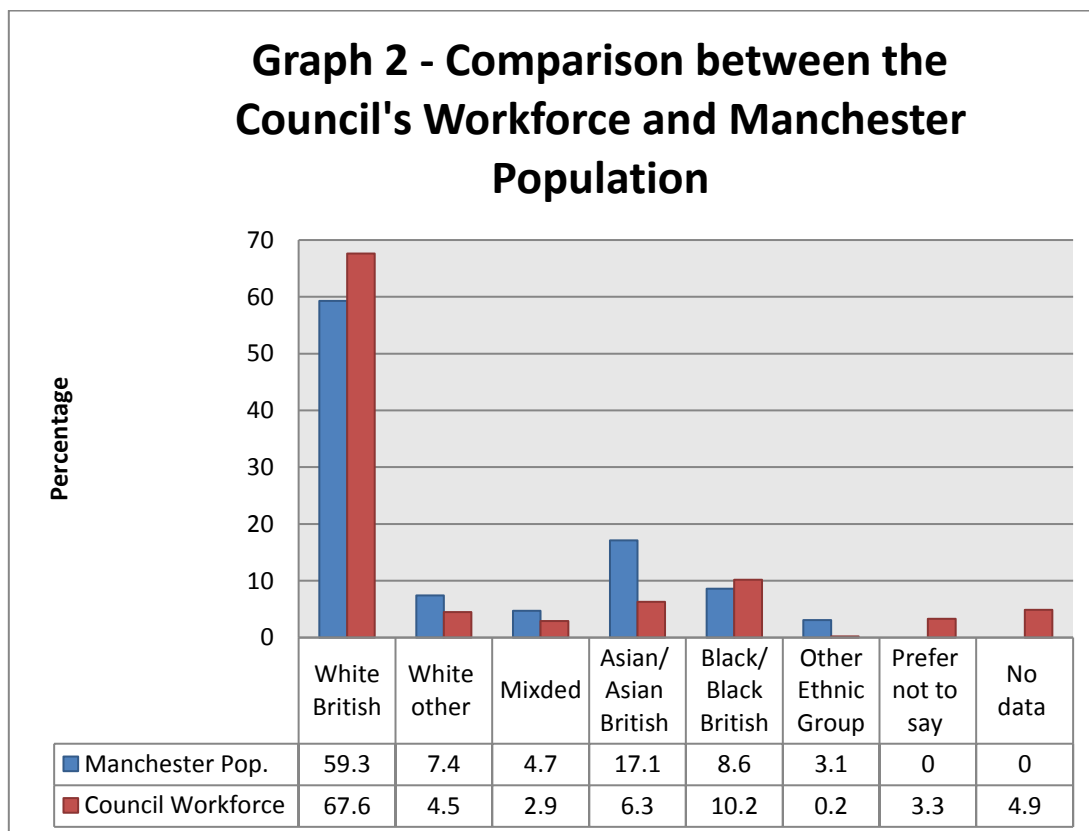
Recommendation No. 1	The Council's future workforce equality reporting would be strengthened by including the 'no data' group and staff who 'prefer not to say' when reporting on the composition of the workforce.
Recommendation No. 2	It would be timely for the Council to review its current actions to increase the completeness of its ethnic workforce data for their effectiveness. This activity would be most effective if supported by each of the Council's Directorates

	taking their own action to improve the completeness of their data.
--	--

3.1.4 The current Council workforce in terms of ethnicity does not reflect the population the Council serves. The current gap is **13.7%**. When you take a more detailed look at the workforce by broad ethnic group a more complex picture emerges. The largest broad ethnic minority within Manchester is Asian/British Asian (17.1%). Within the workforce this group makes up 6.3% of the workforce. The Black/Black British Group is 8.6% of the Manchester population and 10.2% of the Council's workforce (see Graph 2 for more details). In order to inform its activities to achieve a more representative workforce profile, the Council should enhance its employee data to monitor the representation and distribution of address the underrepresentation of specific ethnic minority groups, not just the BAME group as a whole.

3.1.5 The current practice in the Council when producing and reporting workforce ethnicity data is to report it by using the two categories of BAME and white. The BAME group comprises all the non-white ethnic groups. Ethnic minority groups have different experiences in the labour market and employment. A standalone BAME category restricts the opportunities for these differing experiences to be reflected.

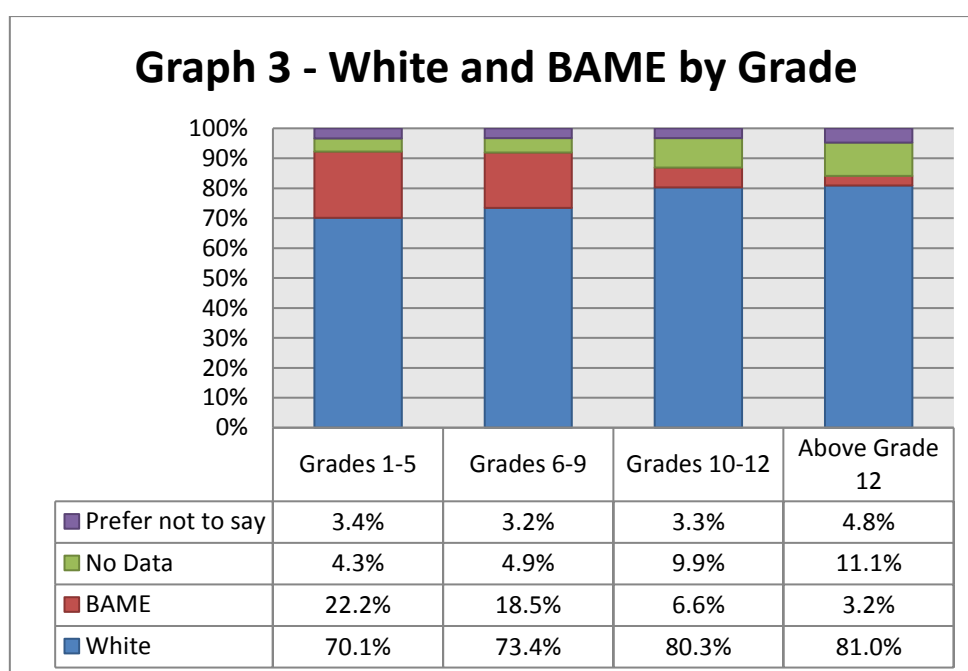
Recommendation No. 3	Adding an additional level of reporting in the Council's workforce reports, which includes reporting by the five broad ethnic categories, would provide a more detailed analysis of workforce equality.
-----------------------------	---



Recommendation No. 4	The Council would benefit from establishing workforce race equality targets for the proportions of staff by broad ethnic
-----------------------------	--

	group, at both corporate and directorate level. These types of target could be monitored and reported on at least an annual basis. Mechanisms to strengthen support and accountability would help directorates to own and respond to their workforce race equality targets.
--	---

3.1.6 BAME staff are not evenly represented throughout the workforce by grade in the Council. BAME staff are overrepresented, compared to the overall workforce, in the lower grades and significantly underrepresented in the higher grades. BAME staff make up 22.2% of grades 1-5 and 3.2% above grade 12. See Graph 3 for more details. There is a significant drop in BAME representation from the grade band 6 – 9 and grade band 10 – 12, although identifying the exact point at which this drop takes effect would require further analysis of that data than was possible during the course of the review. See Graph 4 for additional information.



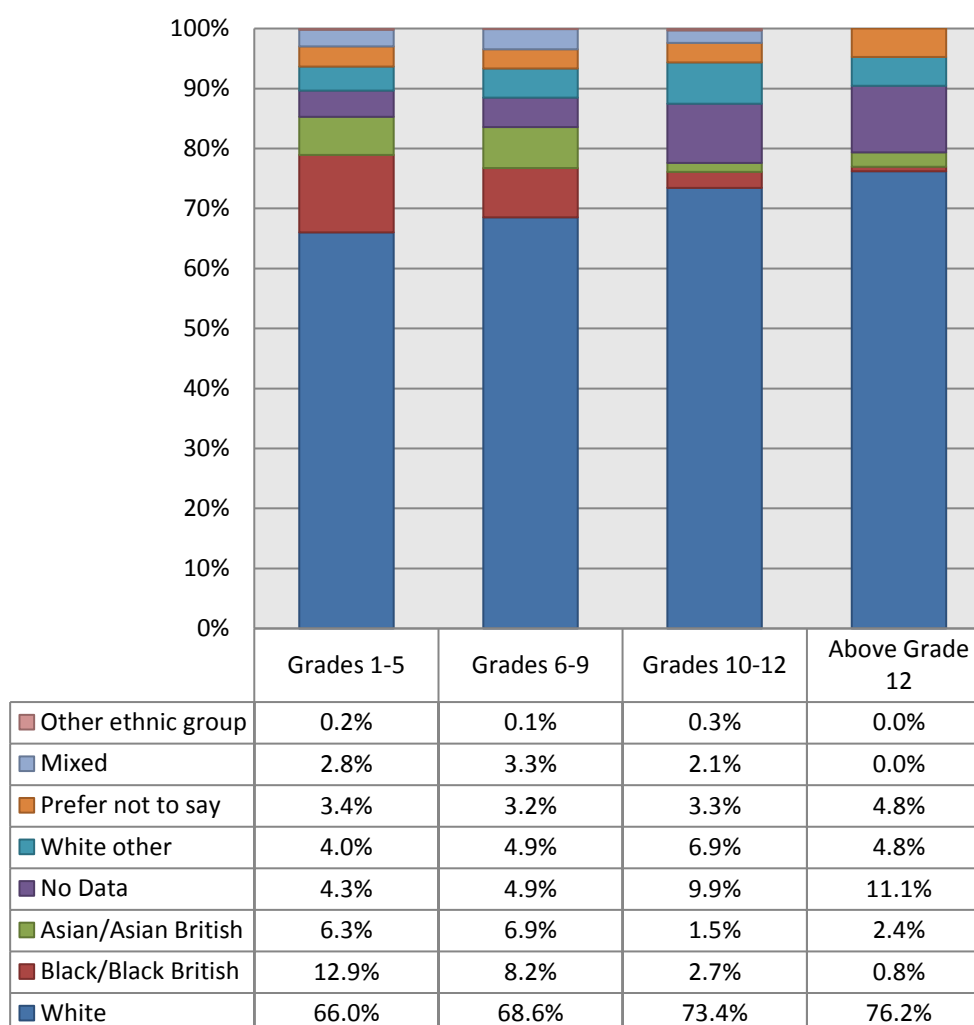
3.1.7 In terms of the workforce composition by broad ethnic group, the Black/Black British group (the largest of the ethnic minority groups in the Council Workforce) goes from 12.9% in grades 1-5 to 0.8% above grade 12. This is a reduction of by a factor of 16. The Asian/Asian British group make up 6.9% in grades 6-9 and reduces to 2.4% in above grade 12; a reduction by a factor of 2.8.

Recommendation No. 5	It would be helpful for the Council to include specific BAME representation targets for the grades 10 -12 and above grade 12.
-----------------------------	---

Recommendation No. 6	It would also be helpful to monitor promotions by broad ethnic group, particularly at grade 10 and above.
-----------------------------	---

It should be noted that work has already begun in relation to recommendation number 6.

Graph 4 - Ethnic Group by Grade



3.1.8 BAME staff are not represented evenly across the Council's directorates. At the time of the review, Adult Services directorate had the highest percentage of BAME staff in its workforce at 24.8%. In contrast the Neighbourhoods directorate had the lowest BAME workforce percentage at 12.4% which was half of that of Adult Services. It is acknowledged that staff turnover and internal movement of employees mean that directorate / service level representation is fluid and that this variance in representation may be circumstantial. Longer-term monitoring of this would provide a clearer assessment.

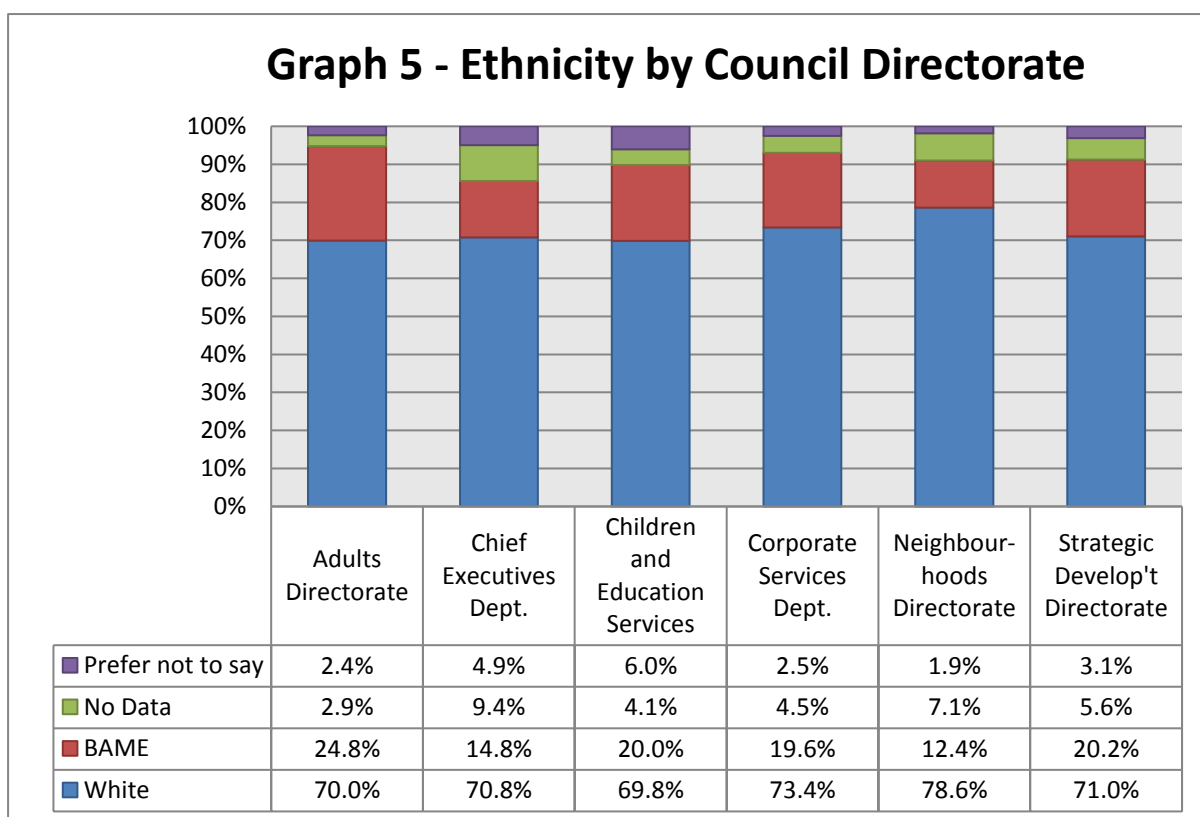
3.1.9 Four directorates were on or above the Council BAME workforce average at the time of the review (19.6%):

- Adults Services
- Children and Education Services
- Growth and Development
- Corporate Services

Two directorates were below the average:

- Chief Executives
- Neighbourhoods

For further information see Graph 5 below.



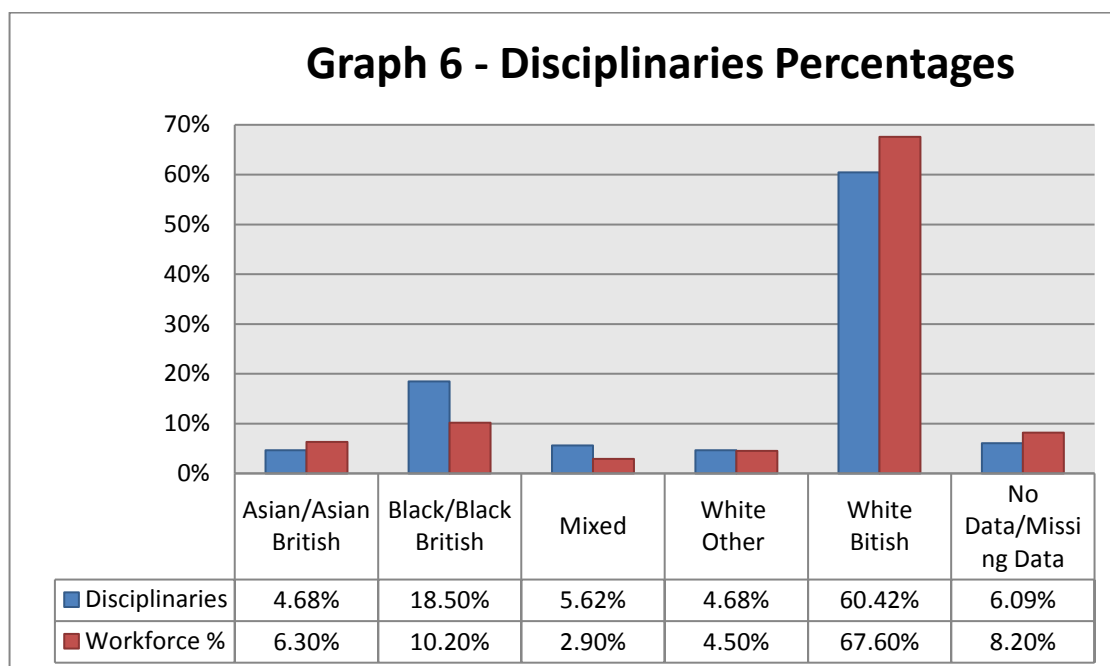
3.1.10 It is anecdotally acknowledged that representation in the ethnic profile of the Council's workforce, particularly at the senior levels, has been a longstanding issue, although historical data was not available to illustrate the extent of this. This is in contrast to the gender composition of the SMT over a comparable timescale, which has changed significantly and demonstrates the potential for positively impacting the BAME representation of the Council's leadership.

Recommendation No. 7	The Council would benefit from introducing a BAME staff development programme with the aim of increasing BAME staff with the middle and senior grades, based on a strengths model. This would build on BAME staff's existing skills and capabilities and provide them with experience and exposure with working at a more senior level to their current grade.
-----------------------------	--

3.2 Employee Relations Data and Other Issues

3.2.1 It was hoped to review employee relations data in relation to both disciplinary action and employee disputes resolutions. However it was not possible to review employee disputes resolution data over a substantial period due to the constraints of the review period and the way that casework is recorded.

- 3.2.2 All completed disciplinary cases covering the year 2016/17 to 2019/20 were examined. A total of 427 cases were included in the data set. From the information provided BAME staff were more likely to enter the formal disciplinary process than white staff.



- 3.2.3 The only broad ethnic minority group this did not apply to was the Asian/Asian British group. The group with the highest rate of disciplinary compared to their numbers within the workforce were staff from the Mixed group with a rate of 1.93 times. This was followed by the Black/Black British Group with a rate of 1.83 times. Both the White British group (0.89) and the Asian/Asian British Group (0.74) were less likely to enter the Council formal disciplinary process.
- 3.2.4 In relation to dismissals, the numbers were very small and therefore it was not possible to produce reliable data. The data that was examined did show a higher proportion of dismissals for BAME staff as compared to the White British group. The limitations of the review process and the lack of opportunity to examine this further though data examined here though, do not clarify whether this is a circumstantial occurrence or is indicative of a broader pattern. This would need to be monitored on a long term basis to see if the pattern is sustained over a long period.
- 3.2.5 Further analysis would be required to examine the root causes of the disparities in formal disciplinary action being taken, and to assess the extent to which an employee's race is a relevant factor. The author notes that the Council directorates with the highest rates of disciplinary also have the highest numbers of BAME staff, but has not been able to establish within the limitations of the review if there is a causal link between these two sets of data.

Recommendation No. 8	A further investigation into the level of disciplinary action being taken involving BAME staff, by broad ethnic group and by directorate, would help to determine if ethnicity is a causal factor.
-----------------------------	--

- 3.2.6 The flow of workforce race equality monitoring data amongst HROD teams and other relevant services can be strengthened to bring a number of benefits and ensure that staff within and beyond HROD are well informed on key aspects of workforce race equality within the Council. In particular, information sharing between the Workforce Intelligence Team, the Casework Team and the Equality, Diversity and Inclusion Team would be of great benefit.

Recommendation No. 9	It would be helpful for the Human Resources and Organisational Development Department to put in place arrangements for the systematic sharing of workforce race equality data and intelligence; ensuring that issues are identified and appropriate action is taken amongst its key teams and other relevant services.
-----------------------------	--

3.3 Casework Review

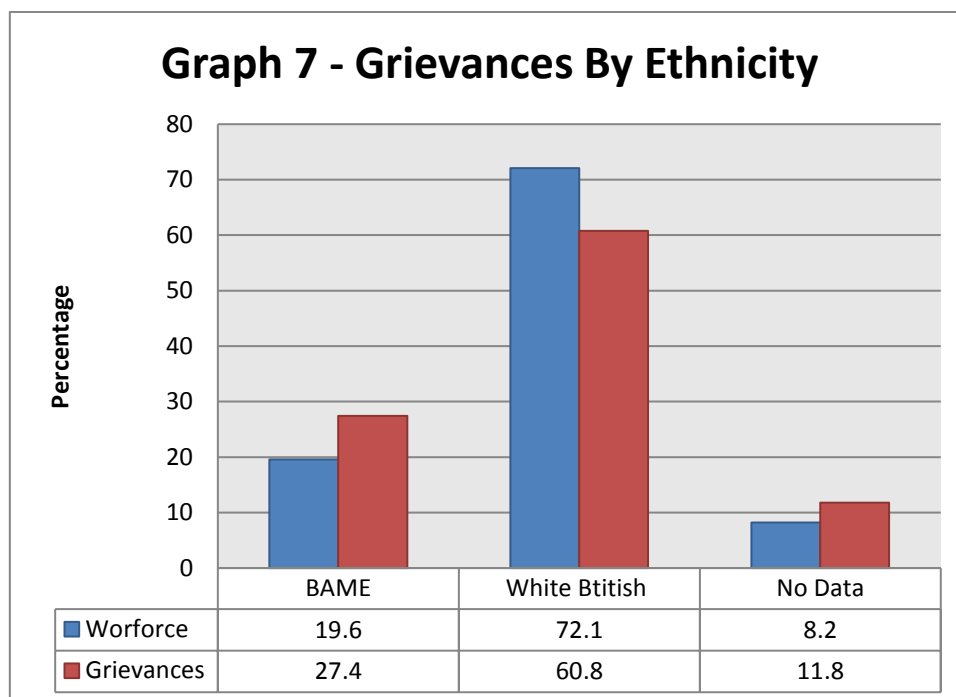
- 3.3.1 The casework review consisted of reviewing both disciplinary cases and employee disputes (grievances) cases; selected on the basis of being the most recent cases with complete data.
- 3.3.2 The Council's approach to recording casework management information has evolved over time and is not consistently underpinned by equalities monitoring data (although where equality issues are relevant to an employee dispute case, this is recorded within a case summary). As a result and within the confines of this review, it is very hard to compare information and cases over longer periods of time.

Disciplinary Cases

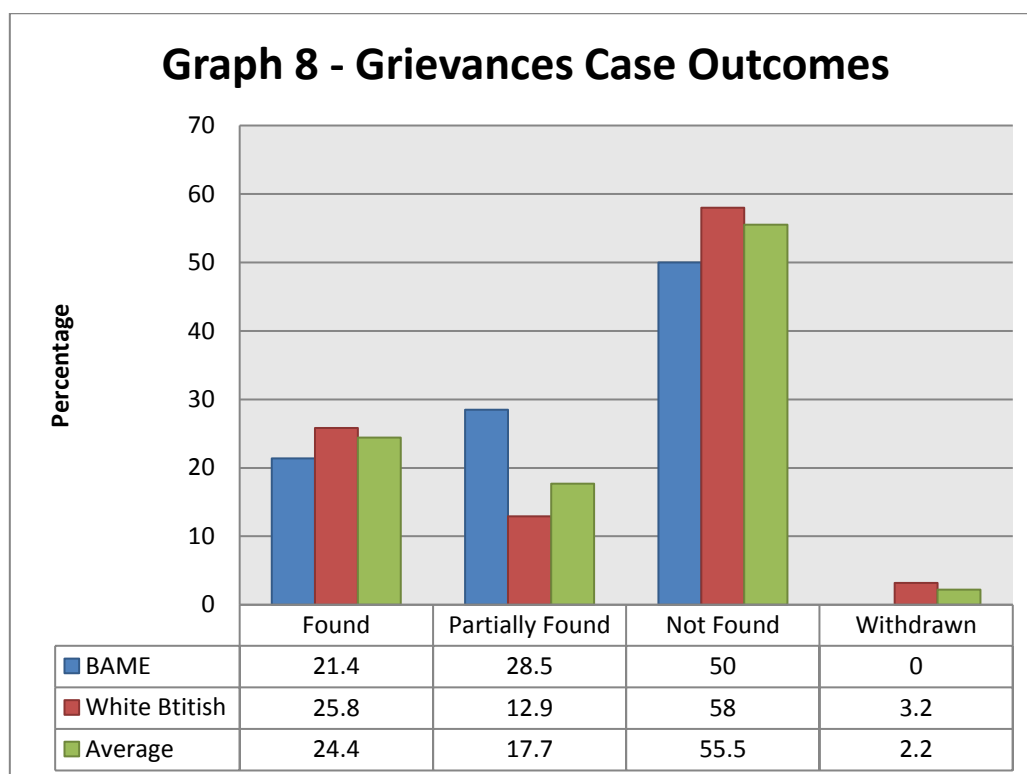
- 3.3.3 Disciplinary cases were reviewed covering alleged:
- Data breaches
 - Safeguarding issues
 - Unauthorised absence
- 3.3.4 A total of 58 case summaries were reviewed. The data breach cases (nine in total) did not highlight any major differences in treatment between BAME and White British staff in the way the formal disciplinary process was managed.
- 3.3.5 Unauthorised absence cases (21 in total) did not highlight any major differences in treatment or in the issuing of sanctions.
- 3.3.6 There were no major differences highlighted by race/ethnicity in the 28 safeguarding cases examined which were grouped in outcome.
- 3.3.7 It should be noted that the City Council has a relatively low threshold for determining what constitutes gross misconduct. In some of the cases reviewed, members of staff charged with gross misconduct did not go on to being dismissed, although gross misconduct is a potential dismissal offense.

Employee Disputes (Grievances) Cases

- 3.3.8 A total of 51 employee dispute case summaries were reviewed. The cases dated from 2017 to 2019. All cases had been concluded. Of the 51 cases, 27.4% were from BAME complainants and 60.8% were White British. There were also complaints from staff for whom there was no ethnicity data held (11.8%) (see Graph 7). The percentage of grievances from BAME staff is higher than their percentage representation in the Council workforce.



- 3.3.9 The outcomes analysis shows that there are small differences in the outcomes between grievances raised by BAME and White British groups, apart from where the grievance was partially found. This was twice the rate for BAME staff, 28.5%, compared to 12.9% (see Graph 8).



3.3.10 The higher percentage of grievances raised by BAME staff is of concern. Of further concern is that when you combine the totals for Found and Partially Found for BAME staff grievance, it is a total of 49.9%, compared to 38.7% for White British staff.

Recommendation No. 10	In order to more fully understand the trends regarding grievances being raised by BAME staff and them being partially or fully upheld, it would be helpful for the Council to closely monitor the level and nature of grievances from BAME staff and their outcomes over a number of years.
------------------------------	---

Staff Survey

3.3.11 It was not possible to review the Council's staff survey results by ethnicity as the survey provider does not analyse the results by ethnicity at present. It would be helpful to the Council if this was made available to assist in understanding how BAME staff view the Council as an employer and gain greater insight into their experiences and views of employment within the Council.

Recommendation No. 11	Obtaining an equalities breakdown of staff survey data would enable the Council to analyse its key results by ethnicity. This could then be triangulated with other relevant data sources, including ongoing engagement with BAME staff, to inform action planning.
------------------------------	---

3.4 Stakeholder Engagement

3.4.1 Four workshops were held with staff within the Council:

- BAME trade union staff network members from Unison and Unite
- BAME Council staff network members
- A selection of Human Resources and Organisational Development staff
- The Council's Equality Champions Group

Both the HROD and Equality Champions groups included representation from BAME staff. The two workshops specifically with BAME staff focused on people's experiences and perception of workforce race equality issues. The other two workshops focused on the mainstreaming of EDI (including race equality) in the Council. It is acknowledged that due to the constraints of the review, this is a limited sample of participants and the experiences and views that were shared are not necessarily representative of the views or practices of the Council's workforce as a whole. However, they are represented here as a true account of the feedback from the participants, which was given voluntarily and in good faith.

The importance of race equality in the Council

- 3.4.2 Participants from all four workshops were asked to rate the importance of race equality in the Council on a scale of 1 – 10; 1 being totally unimportant and 10 having the highest priority.
- 3.4.3 The BAME staff who participated in the workshops consistently gave this a lower rating than their non-BAME counterparts. Across all workshops the average score was 4.6; the combined average for both the BAME staff workshops was 3.4, whereas the combined score for both the HROD staff and the Equality Champions was 5.8. There is a clear difference in the perception of the importance of race equality in the Council between the BAME staff and non-BAME staff engaged in this review. For further details see Table 1 below.

Table 1 – The Importance of the Council's Approach to Race Equality		
Workshop	Score Range¹	Average Score
BAME trades union network	1 to 5	4.2
BAME Council staff network	1 to 4	2.6
Overall BAME score		3.4
HROD Staff	3 to 7	5.6
EDI Champions	5 to 7	6.1
Overall		4.6

1 – The score ranges exclude one person in two workshops who were outliers from the rest of the members in their workshop. Their scores have been included in the average scores for their workshops.

Reasons BAME staff gave for rating race equality in Council

- 3.4.4 The BAME staff engaged in the review had a number of reasons for their scores being lower than their non-BAME counterparts, and they are set out below.

Table 2 – BAME staff concerns regarding workforce race equality in the Council	
Issue	Level of concern
<ul style="list-style-type: none"> • No or little action on race equality in the Council/low priority • No ethnic diversity amongst senior leaders/SMT • Lack of leadership on race equality amongst senior leaders • Lack of trust and confidence in the system • Racism in the Council amongst staff 	Higher Concern
<ul style="list-style-type: none"> • Race equality not visible in the Council • Lack of support for BAME staff to progress • Concerns regarding the recruitment and selection process 	Medium Concern
<ul style="list-style-type: none"> • Lack of voice for BAME staff • No race equality strategy in the Council • Policies have little or no effect 	Lower Concern

The issues of highest concern were raised the most often by BAME staff. It should be noted that all issues raised were of concern to staff who attended both workshops.

- 3.4.5 HROD staff and the EDI Champions provided a similar but slightly wider range of concerns/issues regarding how they rated the importance of race equality; see Table 3 below.

Table 3 – HROD staff and the EDI Champions concerns regarding workforce race equality in the Council	
Issue	Level of concern
<ul style="list-style-type: none"> • There needs to be greater clarity and understanding of race equality • There needs to be a higher/consistent priority given to race equality 	Higher Concern
<ul style="list-style-type: none"> • There is not ethnic diversity at senior levels (SMT and SLG) within the Council • Policies are in place but are not implemented – especially away from the corporate Core 	Medium Concern
<ul style="list-style-type: none"> • Treating everyone the same is not inclusivity • We are approaching complacency when it comes to race equality • The Council is more externally focused • Race equality felt a much higher priority 20 years ago • There is no accountability 	Lower Concern

Table 3 – HROD staff and the EDI Champions concerns regarding workforce race equality in the Council	
Issue	Level of concern
<ul style="list-style-type: none"> • Race equality is seen as “too hard” and therefore gets lowered in priority • Race equality’s importance depends on who you are in terms of seniority • It’s just become a paper exercise 	

BAME Staff Workshops

- 3.4.6 Following the rating of the importance of race equality in the Council, both BAME stakeholder workshops explored additional workforce race equality issues.

Do you think that Black, Asian and other Ethnic Minority (BAME) staff have the same opportunities to advance in the Council as other staff?

- 3.4.7 In short, the BAME staff engaged in both workshops did not feel that they had the same opportunities to advance in the Council compared to other staff. Some of the issues of concern from BAME staff in both workshops, based on their experiences and / or perceptions and as described by them, included:

- White staff are perceived to get promoted quicker;
- The participants were only aware of three BAME members of the Senior Leadership Group (SLG). They did not see any visible BAME role models;
- They see a lack of encouragement for BAME staff;
- In their experience, people tend to recruit people who look like them;
- Participants reported there being teams where the whole team looks like the team leader;
- In their view, white managers do not feel that black staff will fit into their teams;
- Participants reported some BAME staff self-excluding themselves from opportunities as they do not see other BAME people being promoted.

Do you think that the Council deals with complaints of racism (harassment, abuse or discrimination) effectively?

- 3.4.8 BAME staff at both workshops did not believe that the Council dealt with complaints of racism effectively. Some of the issues of concern from BAME participants, based on their views and / or experiences included:

- A view that BAME staff are worried about making a complaint and challenging behaviour for fear of victimisation or retribution;
- The view that managers don’t understand the nature of racism and don’t see how offensive some behaviour is;
- A feeling that racial harassment is often ignored and not investigated;
- A view that there is a reliance on informal process to resolve any complaints of racism/racial harassment;

- Accounts that some staff felt they did not know who to go to in order to complain about behaviour “in the moment”;
- Observations that racism is more covert these days and the view that this is not understood by managers;
- Accounts of inconsistency in dealing with racism; the view that it depends on who you go to and what type of response you will get.

What can be done to improve workforce race equality in the City Council?

3.4.9 BAME participants had a range of ideas as to how workforce equality can be improved in the Council. Some BAME staff also raised concerns that they did not know how to influence change. Ideas for improving workforce race equality included:

- Acknowledging the issue. Participants felt that this should come from the Council’s leaders and should give a clear commitment to improving outcomes for BAME employees;
- Strengthening the accountability for race equality in the Council;
- Developing a workforce race equality strategy with targets and monitoring;
- Reintroducing positive action measures to make progress;
- Ensuring senior management team buy-in to drive race equality in the Council;
- Developing approaches to create equal representation at all grades;
- Having a designated “go to” senior person if you have race equality concerns;
- Introducing more learning opportunities other than e-learning; training that promotes behaviour change;
- Creating spaces for people to have safe, progressive conversations about race and racism in the Council.

Recommendation No. 12	It would be beneficial for the Council to develop a partnership with BAME staff stakeholders groups to advance workforce race equality in the Council. Working closely with the recently relaunched BAME staff networks and other BAME stakeholders will help to achieve this, as will significant involvement from members of the SMT and SLG.
------------------------------	---

Recommendation No. 13	It would be helpful to appoint a designated Senior Lead for workforce race equality in each directorate.
------------------------------	--

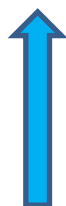
Recommendation No. 14	Accelerating the refresh of the Council’s EDI communications approach would ensure that: <ul style="list-style-type: none"> • It is high profile; • Key messages (such as the importance of race equality in the Council) reach all staff; • It informs staff of progress made on race equality and reflects the experiences of BAME staff; • Communications support the mainstreaming of race equality.
------------------------------	--

HROD Staff and the EDI Champions

3.4.10 The HROD staff and the EDI Champions engaged in the review participated in separate workshops to explore the Council's approach to EDI and workforce race equality. Based on their experiences and / or observations, both groups formed similar conclusions.

3.4.11 The groups were presented with a framework and model for mainstreaming EDI. The model included several different approaches to the management of EDI within an organisational context, ranging from Unimportant through to Mainstreaming.

- Mainstreaming
- Embedding
- Secondary
- Marginal
- Unimportant



3.4.12 Participants in both groups were asked two questions in relation to the Council's approach to EDI and race equality.

(1) Please state what approach you think the Council takes to EDI e.g. marginal, secondary, embedding or mainstreaming.

Both groups described the Council's approach to EDI as **Secondary** moving to towards **Embedding** in their views. Some participants noted that they consider there to be an inconsistent approach in the Council. There was a unanimous view across all group members that there is a difference between the approach to EDI at the Corporate Core and in services. One of the perceived reasons for the difference was a lack of visible accountability in relation to EDI that the participants were aware of. The opinion was also expressed that there was very little traction when it came to advancing EDI in the services.

(2) Do you think the approach is the same for workforce race equality?

Both groups stated that they felt there was a difference in the approach between EDI in general and workforce race equality. Both groups believed that workforce race equality was treated as a **Marginal** issue in the Council. Thus it has a lower priority and status than EDI in general.

3.4.13 Participants were then asked to focus on barriers and solutions to mainstreaming EDI and race equality in the Council.

(3) What are the major barriers to mainstreaming EDI and in particular race equality in the Council?

- Participants felt that service delivery is prioritised over EDI considerations;
- The view was expressed that people are not directly managing the issues and that managers often lack the capacity and / or confidence to do so;

- Training was identified as an area needing to be prioritised so that managers are aware of the issues and know what to do;
- Participants felt that the Council needs to be aware of the changing attitudes in society and take step to ensure that they don't have a negative effect in the Council amongst its workforce;
- There was a perceived lack of accountability in the services for EDI.

(4) What are the major actions that are required to help the Council to mainstream:

(1) Its workforce race equality agenda

(2) Its wider EDI work

- Participants felt that stronger SMT ownership of and visible leadership on workforce race equality was needed;
- Participants stated that achieving visible diversity/lived experience within the SMT [in relation to race equality] would build commitment;
- Participants felt that there should be dedicated team in each directorate to implement EDI and race equality.

3.4.14 For a further discussion and recommendations on mainstreaming, please see section 3.8.

Stakeholder Meeting the Unite Trade Union

3.4.15 A stakeholder meeting was held with a representative of the Unite trade union. A meeting was also requested with the Unison and GMB trade unions.

3.4.16 A number of concerns were expressed in relation to workforce race equality based on the experience of BAME members of the union. The Unite trade union representative engaged in the review expressed the view that the Council is institutionally racist. We were informed that the belief is held due to the workforce race equality practices of the Council. Concerns related to:

- The ethnic composition of the workforce and the and the lack of ethnic diversity at senior levels within the Council, especially the SMT;
- The employee relations practices of the Council; specifically disciplinaries and employee dispute resolution (grievances and dignity at work complaints). Unite's representative expressed the view that BAME staff are reluctant to raise grievances about treatment related to race for fear of "come back" and if they do raise issues, that BAME staff are pressurised to resolve them informally;
- An observed lack of representation of BAME people in internal and external communications;
- The priority the Council gives to workforce equality – in particular the view that it should be given a higher priority;
- Recruitment and selection practices, which the Unite representative believes disadvantage BAME people because of unnecessary criteria being included in person specifications. Additionally, the view was expressed that there needs to be greater ethnic diversity on recruitment panels;

- Decision making in the Council, which Unite feel does not often support the promotion of race equality. Unite's representative expressed concerns regarding equality impact assessments, stating they are not robust and are not consistently completed when they are required;
- Unite felt that the nature of racism is not readily understood by many Council officers, and that this can disadvantage BAME staff when an employee dispute has been raised (for example, if the investigating officer does not understand why the use of certain words is offensive).

Recommendation No. 15	The Council would benefit from developing a partnership agreement with the trade unions on how the Council and the staff trade unions will work together to advance workforce race equality in the future.
------------------------------	--

3.4.17 The view expressed by Unite that the Council is institutionally racist was considered within the wider context of this review, at the request of the Council and in light of all available evidence, as outlined in this report. It should be noted that institutional racism is a complex and often misunderstood term. If an organisation is deemed to be institutionally racist, it does not automatically mean that all the people who work in it or take decisions there are racist. Reaching any conclusions on whether an organisation is institutionally racist will always involve an element of judgement.

3.4.18 The definition of institutional racism which the report author found the most helpful in undertaking this review is as follows:

"If racist consequences accrue to institutional laws, customs or practices, that institution is racist whether or not the individuals maintaining those practices have racial intentions."

The Commission for Racial Equality

3.4.19 On the balance of the information available, this review does not consider that Manchester City Council is institutionally racist. This is in part due to the Council's commitment to listen to its staff which led to the commissioning of this report, and a commitment from the outset to use its findings, in collaboration with a range of relevant stakeholders including BAME staff, to develop and implement a range of measures to improve outcomes for BAME Council employees.

3.5 Policy Framework

3.5.1 A number of policies were examined to assess the Council's policy framework governing workforce race equality. Policies examined were:

- Capability Policy
- Disciplinary Policy
- Employee Disputes Resolution Policy
- Equal Opportunities in Employment Statement
- Managing Attendance Policy
- Race Equality Toolkit

- Recruitment and Selection Policy
- Special Leave Policy

Capability Policy

- 3.5.2 The policy does not explicitly require a manager to take into account if an individual's performance may be impacted by the performance of religious or cultural observances/obligations. This could have an indirect affect upon some BAME staff. There were no major issues of concern identified with the policy contents.

Recommendation No. 16	The capability policy could be strengthened by providing additional guidance to its people managers on the implementation of the policy to avoid a possible indirect negative impact on BAME staff when their performance could be adversely affected by religious or cultural observances/obligations.
------------------------------	---

Disciplinary Policy

- 3.5.3 The Disciplinary Policy does not make clear the need to avoid discrimination in decision making when applying the policy. There are also some terms used in the policy that are unhelpful. For example, the term "heated outbursts" is used. Speaking loudly does not mean the same thing indifferent cultures and could lead to behaviour by certain ethnic minority groups being labelled as aggressive, when this is not the individual's intention.

Equal Opportunities in Employment Statement

- 3.5.4 This statement is dated 2011 and does not appeared to have been reviewed since this date. The statement does include race as an issue that need to be considered when promoting equal opportunities in employment in the Council. Section 7.5 of the statement allows for positive action to be taken and it includes positive action for BAME people, although the review did not identify the availability of any current Corporate programmes related specifically to race that adopt a positive action approach.
- 3.5.5 The statement overall is a useful contribution to the Council's policy framework. However, more could be done to implement its provision, particularly in relation to positive action for BAME staff and job applicants.

Recommendation No. 17	A review of the Equal Opportunities in Employment Policy Statement would allow the opportunity for it to take into account the current composition of the workforce's ethnic profile and take a proactive stance on positive action for BAME staff and job applicants.
------------------------------	--

It should be noted that the Council has already begun to review its Equal Opportunities in Employment Policy Statement and this is due to be completed during the 2020-21 financial year.

Employee Disputes Resolution Policy

- 3.5.6 The policy does not describe what training is available to hearing officers. This is particularly important when staff are raising issues related to discrimination or harassment which might be outside of the direct understanding of the hearing officer. BAME engagement participants and the Unite union representative felt that there was a general lack of awareness of race equality at work and how racism can manifest itself amongst colleagues. Some BAME participants felt that a lack of awareness within teams and more broadly disadvantaged them.

Recommendation No. 18	<p>A review of the Employee Dispute Resolution Policy would enable the Council to introduce measures such as:</p> <ul style="list-style-type: none">• Specifying what training hearing officers should receive in relation to race equality and other EDI issues;• Putting provisions in the policy to allow for an expert advisor to assist the hearing officer when there are matters of race or discrimination being raised as part of the dispute;• Implementing similar measures for appeals.
------------------------------	--

Managing Attendance Policy

- 3.5.7 The policy does not currently consider its application in relation to an employee who has been absent from work for reasons connect with experiencing proven harassment, violence or aggression at work. The application of the policy should actively seek to not disadvantage staff in this situation.

Race Equality Toolkit

- 3.5.8 The Race Equality Toolkit is in need of a review and update to make it more reflective of the current legislative context and to make it a more useful tool to managers and others when dealing with possible cases relating to race.

Recruitment and Selection Policy

- 3.5.9 The Recruitment and Selection policy makes it clear about the need to appoint the best person for the job. The policy could be clearer that discrimination needs to be avoided in the recruitment and selection process. The policy could also make clearer the opportunities for the use of positive action in the process (section 158 of the Equality Act 2010) and the use of General Occupational Requirements as appropriate. It is noted however, that the policy document is supported by supplementary and more detailed guidance which outlines these considerations.
- 3.5.10 In addition, the policy could make it clearer what training is required to participate in the recruitment and section process in the Council. The pre-requisite recruitment and selection e-learning tool aims to strengthen recruiters' capacity on fair

recruitment considerations, and the policy currently misses the opportunity to direct readers to that resource.

Special Leave Policy

- 3.5.11 With such a diverse workforce as the Council's, it is feasible that application of the special leave policy may be sought by staff with relatives/family outside the UK. For example, some BAME staff may need to visit family outside the UK for reasons of ill health or death, or staff from different ethnic backgrounds may have different family obligations attached to culture and / or tradition. In these instances, staff may wish to apply for longer periods of special leave than staff who don't have family outside the UK. The policy does not currently explicitly take account of situations such as these.

Recommendation No. 19	The Council's Special Leave policy could be strengthened by taking account of and reflecting the different needs of BAME staff including different cultural requirements.
------------------------------	---

Equality Impact Assessments

- 3.5.12 When reviewing most of the policies above, it was not clear if the policies had been equality impact assessed; pursuant to the Council's statutory responsibilities under section 149 of the Equality Act (the Public Sector Equality Duty). The review therefore concluded that the Council has an inconsistent approach to completing equality impact assessment (EIA).

Recommendation No. 20	<p>A review and refresh of the Council's arrangements for conducting equality impact assessment (EIA) would ensure that they are:</p> <ul style="list-style-type: none">• Completed when they should be;• Comprehensive, complete and accurate;• Quality assured with a distinct process in place;• Monitored, managed and well governed.
------------------------------	--

Protection from Third Party Harassment

- 3.5.13 As noted in section 3.1, the Council employs a racially diverse workforce. In the course of undertaking the engagement element of this review, the issue was raised by both BAME participants and the Unite trade union that some BAME staff have been subject to racial harassment by members of the public when carrying out their duties. The Council does not currently have a policy framework to protect staff from harassment from service users and members of the public (third party harassment). The development of such a policy would make the Council's position clear to service users and members of the public on its stance towards harassment, violence and aggression directed towards its employees. Staff with other protected characteristics, who may also be vulnerable to such harassment, would also be protected by such a policy.

Recommendation No. 21	Adopting a third party harassment policy would protect the Council's employees from harassment, violence and aggression from service users and members of the public.
------------------------------	---

3.6 Recruitment and Selection

3.6.1 During the engagement phase of this review, concern was raised by BAME participants and the Unite union representative about the recruitment and selection process within the Council. The first concern expressed was that BAME staff were perceived to be treated differentially to their disadvantage, within the recruitment system.

3.6.2 Additional concern was expressed about the ethnic diversity of recruitment panels and this was perceived to be to the disadvantage of BAME staff and job applicants. There is no specific guidance on managing the ethnic composition of recruitment panels, although the recruitment and selection policy does advocate panel diversity in high level terms.

Recommendation No. 22	Ethnic monitoring of recruitment panels would provide additional insight for the Council on its recruitment and selection practices and enable it to conduct better analysis of the impact of ethnic diversity within the recruitment process.
------------------------------	--

Recommendation No. 23	Using this insight, developing clearer arrangements to ensure that all recruitment panels are diverse (including but not limited to being ethnically diverse, with at least one BAME panel member where appropriate) would further promote inclusive recruitment practices.
------------------------------	---

3.6.3 Recruitment and selection e-learning training has been recently re-introduced within the Council. Although it is mandatory for panel members, this review found that not all Council officers engaged are clear that it is mandatory before being able to participant in a recruitment exercise.

3.7 The Training Offer

3.7.1 A high level review was undertaken of the Council's EDI and race equality training offer to its staff. All staff are required to complete the Equality Essentials e-learning training course, the mandatory training on EDI issues at corporate level. There may be additional training within particular directorates but this was not possible to determine given the timescale for this report.

3.7.2 The Council at corporate level also offers a number EDI related programme courses. There are additional courses available in relation to:

- Age discrimination
- Disability
- Mental health

- Religion and belief
- Sexual orientation
- Unconscious bias

There were not specific courses related to race equality or ethnicity.

- 3.7.3 The review did not find that the Council has in place any specific staff development programmes targeted at BAME staff to support their advancement. The Council has committed to review its approach to talent management and is encouraged to take measures to ensure that the needs of BAME staff are included.

Recommendation No. 24	A review and strengthening of the Council's training offer in relation to race equality would help to clarify for all staff the importance of race equality in the Council and what is expected of them.
------------------------------	--

Recommendation No. 25	Developing a 'managing a diverse workforce' training programme would equip people managers with the necessary knowledge and skills to manage an ethnically diverse workforce and promote race equality and EDI in relation to workforce issues. The programme would be of greatest impact if it was mandatory for all people managers within the Council.
------------------------------	---

3.8 Mainstreaming EDI and Race Equality

- 3.8.1 Many of the staff engaged in the process of undertaking this review regarded the Council's approach to managing its EDI agenda as a secondary issue, and race equality as marginal one. This meant that in their view, the importance and status of EDI and race equality in particular is not as high as it should be and the work of Council in these areas could benefit from a more strategic approach.

- 3.8.2 Mainstreaming EDI is a strategic approach to the management of EDI and is equally adaptable to race equality with a focus on a systematic, sustainable change. The approach consists of building an organisation's infrastructure to deliver its EDI objectives.

- 3.8.3 The Council would make great strides in its race equality commitments by focusing in the short to medium term on building:

- Commitment and leadership at all levels within the workforce
- Wider responsibility and accountability for race equality in the Council
- Knowledge and skills within the workforce
- Prioritisation and resourcing of the race equality agenda
- Other aspects of the mainstreaming EDI approach to ensure a sustainable approach to race equality in the Council

Recommendation No. 26	Formally adopting a mainstreaming approach to workforce race equality and the wider EDI work of the Council would lead to meaningful and sustainable positive change.
----------------------------------	---

Recommendation No. 27	Equipping leaders in the Council to understand and lead the mainstreaming approach would be vital to embedding it in the organisation.
----------------------------------	--

4 Conclusions

4.1 The Experiences and Views of BAME Council Staff

4.1.1 Whilst the sample of BAME staff engaged in this review was limited, and it has been acknowledged that their views may or may not reflect those of other BAME Council staff, there is nonetheless a strong sense that the BAME participants shared a disappointment in what they saw as the Council's lack of progress on workforce race equality, despite a long term public commitment to equality and diversity. These views were shared by the non-BAME review participants. There were a number of significant concerns in relation to their experiences of working in the Council which have been highlighted in this report:

- A lack of representation of BAME staff in the senior grades within the workforce and particularly within the SMT. The review of workforce equalities monitoring data supports this view.
- Higher rates of BAME staff entering the formal disciplinary process within the Council than their non-BAME counterparts.
- Higher rates of grievances being raised by BAME staff, with a higher rate of their grievances being found/partially found.

4.1.2 BAME participants in the review consistently gave a lower rating to the importance of race equality in practice in the Council, compared to their non-BAME counterparts. There were a range of reasons for a lower rating, which were consistent across both of the workshops held with BAME staff.

4.1.3 BAME staff also believed that they did not have the same opportunities to advance in the Council as other staff did. Additionally, BAME staff felt that within the Council, complaints of racism, harassment or abuse were not dealt with well. BAME staff had a range of views and ideas as to how workforce race equality could be advanced.

4.2 Mainstreaming EDI and Race Equality

4.2.1 For change to be sustained it has to become part of an organisation's culture; the ways of seeing and doing things. For EDI goals and outcomes to be realised, they need to become part of what everybody does on a daily basis i.e. part of the mainstream activities within the organisation. And for this to become effective, EDI and race equality need to be considered from the inception of pieces of work.

4.2.2 From the evidence gathered for this review, it cannot be said that EDI and race equality in particular fall within this mainstream approach when defining Manchester City Council's priorities or day to day work across the whole of the organisation (there are some examples of good practice, but equally there are enough areas requiring development to prevent this from being considered a mainstreamed approach). This is for a number of reasons:

- (a) EDI and race equality cannot be driven only from the corporate centre. There needs to be widespread ownership, commitment and leadership at all levels and across the Council. It is recognised that there are some good examples of EDI work being undertaken away from the corporate centre and there are EDI Champions within each of the Council's directorates. However, staff engaged for this review felt that EDI is treated as a Secondary issue in the Council and race equality was a marginal one.
 - (b) The review did not identify that responsibility for EDI and workforce race equality is consistent or widespread in the Council. In turn very few people / key roles seem to be held accountable for the advancement of workforce race equality, leading to the agenda losing traction across the wider organisation.
 - (c) The review and in particular, the views and experiences of the BAME participants in it, raised concerns about the extent to which some of the Council's people managers are able to proactively advance workforce race equality; in particular, the management of an ethnically diverse workforce and being confident in managing race related issues that might arise.
 - (d) In the view of staff engaged for this review, insufficient priority is given to workforce race equality within the Council.
- 4.2.3 In light of these concerns, the Council would benefit greatly from putting into practice a mainstreaming approach in relation to workforce race equality and its wider EDI work. This would be best underpinned by senior leaders across the organisation understanding and being able to apply a mainstreaming EDI approach to their own practice as well as the Council's race equality and broader EDI work.
- 4.2.4 A methodology for developing and embedding a mainstreaming approach to EDI is appended to this report.

4.3 Action and Improvement

- 4.3.1 Whilst the completion of this review and delivery of the report present some challenging and concerning issues for the Council to take account of, the author strongly encourages the organisation to see this as an opportunity to positively and proactively build on its findings and establish measures to achieve sustained and effective action to advance workforce race equality. The approach to achieve this should be strategic and developed in partnership with stakeholders.
- 4.3.2 The review of the workforce composition highlights this as an area of particular focus. The data suggest there has been little substantial change in the representation of BAME staff in the Council's senior positions for some time. It is recognised that Manchester City Council, like many other local authorities, has faced huge financial pressures which have impacted upon the size of the workforce and its ability to externally recruit in recent years. Bearing this in mind, there is still a degree of workforce turnover in the Council resulting in opportunities for internal development and progression of BAME staff, provided this is done in a well-managed

way. Progress has been made in other areas of equality and this demonstrates the possibility to do so here.

- 4.3.3 The engagement component of the review also highlighted concern with the level of trust and confidence of Council BAME staff regarding the Council's commitment to workforce race equality. The BAME staff who engaged in the review clearly wanted to see more visible action from members of the SMT and the organisation as a whole. A positive aspect of this was that BAME participants on the whole still wanted to work collaboratively with the Council to make improvements; this is an opportunity to co-design solutions with its workforce that the Council is encouraged to act upon. However, this view was not held by everyone, with some BAME staff declining to be involved due to scepticism that progress would be made.
- 4.3.4 The author stresses the importance of an effective partnership being developed between BAME staff, their trade unions, the SMT and directorate senior managers and relevant services to make progress in this area. Transparency, honesty and patience will be required by all involved to rebuild trust and confidence, but will ultimately move the Council and its BAME workforce into a much better place.

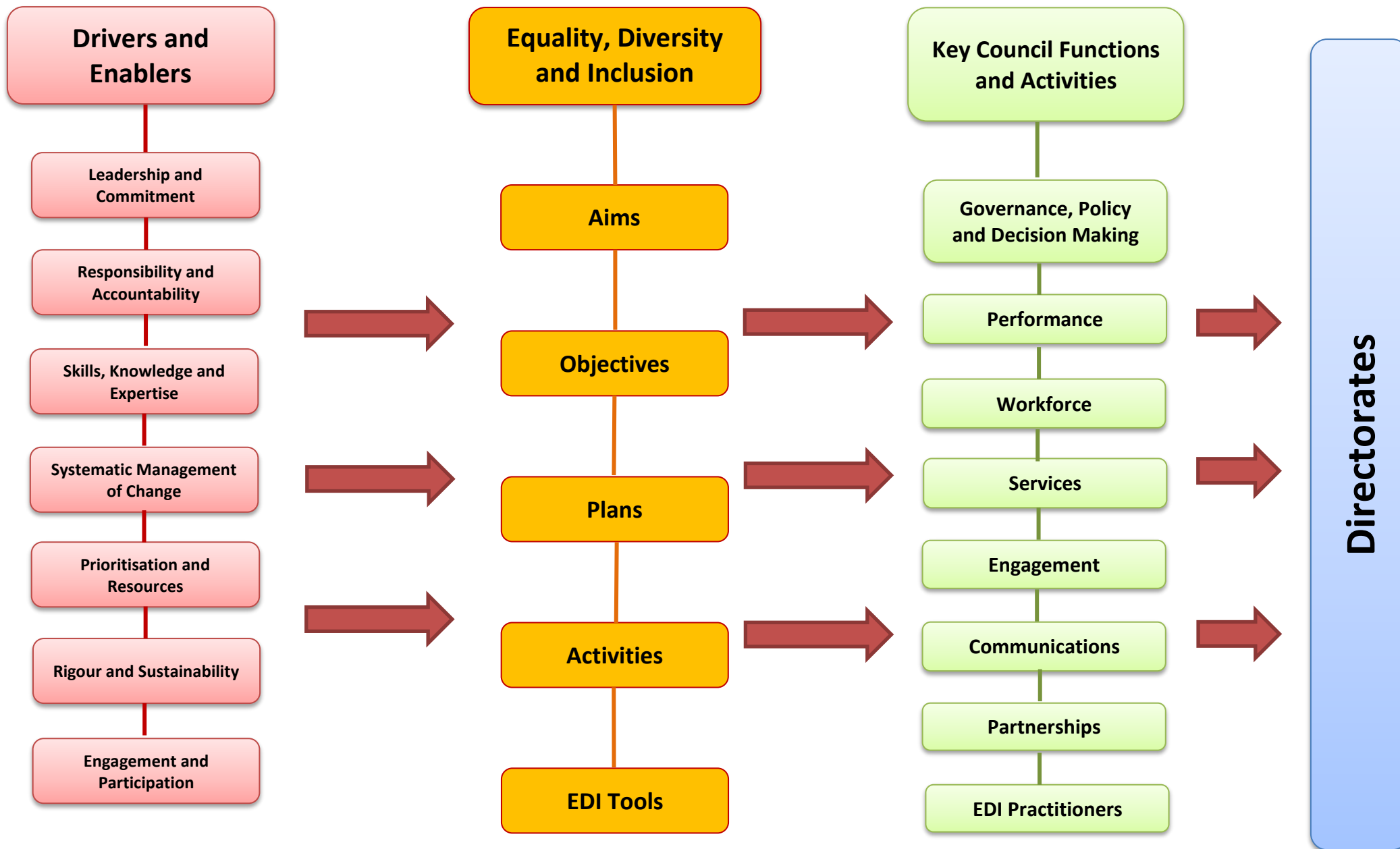
5 Appendix 1 - List of Recommendations

No.	Recommendation
1	The Council's future workforce equality reporting would be strengthened by including the 'no data' group and staff who 'prefer not to say' when reporting on the composition of the workforce.
2	It would be timely for the Council to review its current actions to increase the completeness of its ethnic workforce data for their effectiveness. This activity would be most effective if supported by each of the Council's Directorates taking their own action to improve the completeness of their data.
3	Adding an additional level of reporting in the Council's workforce reports, which includes reporting by the five broad ethnic categories, would provide a more detailed analysis of workforce equality.
4	The Council would benefit from establishing workforce race equality targets for the proportions of staff by broad ethnic group, at both corporate and directorate level. These types of target could be monitored and reported on at least an annual basis. Mechanisms to strengthen support and accountability would help directorates to own and respond to their workforce race equality targets.
5	It would be helpful for the Council to include specific BAME representation targets for the grades 10 -12 and above grade 12.
6	It would also be helpful to monitor promotions by broad ethnic group, particularly at grade 10 and above.
7	The Council would benefit from introducing a BAME staff development programme with the aim of increasing BAME staff with the middle and senior grades, based on a strengths model. This would build on BAME staff's existing skills and capabilities and provide them with experience and exposure with working at a more senior level to their current grade.
8	A further investigation into the level of disciplinary action being taken involving BAME staff, by broad ethnic group and by directorate, would help to determine if ethnicity is a causal factor.
9	It would be helpful for the Human Resources and Organisational Development Department to put in place arrangements for the systematic sharing of workforce race equality data and intelligence; ensuring that issues are identified and appropriate action is taken amongst its key teams and other relevant services.
10	In order to more fully understand the trends regarding grievances being raised by BAME staff and them being partially or fully upheld, it would be helpful for the Council to closely monitor the level and nature of grievances from BAME staff and their outcomes over a number of years.
11	Obtaining an equalities breakdown of staff survey data would enable the Council to analyse its key results by ethnicity. This could then be triangulated with other relevant data sources, including ongoing engagement with BAME staff, to inform action planning.
12	It would be beneficial for the Council to develop a partnership with BAME staff stakeholders groups to advance workforce race equality in the Council. Working closely with the recently relaunched BAME staff networks and other BAME stakeholders will help to achieve this, as will significant involvement from members of the SMT and SLG.

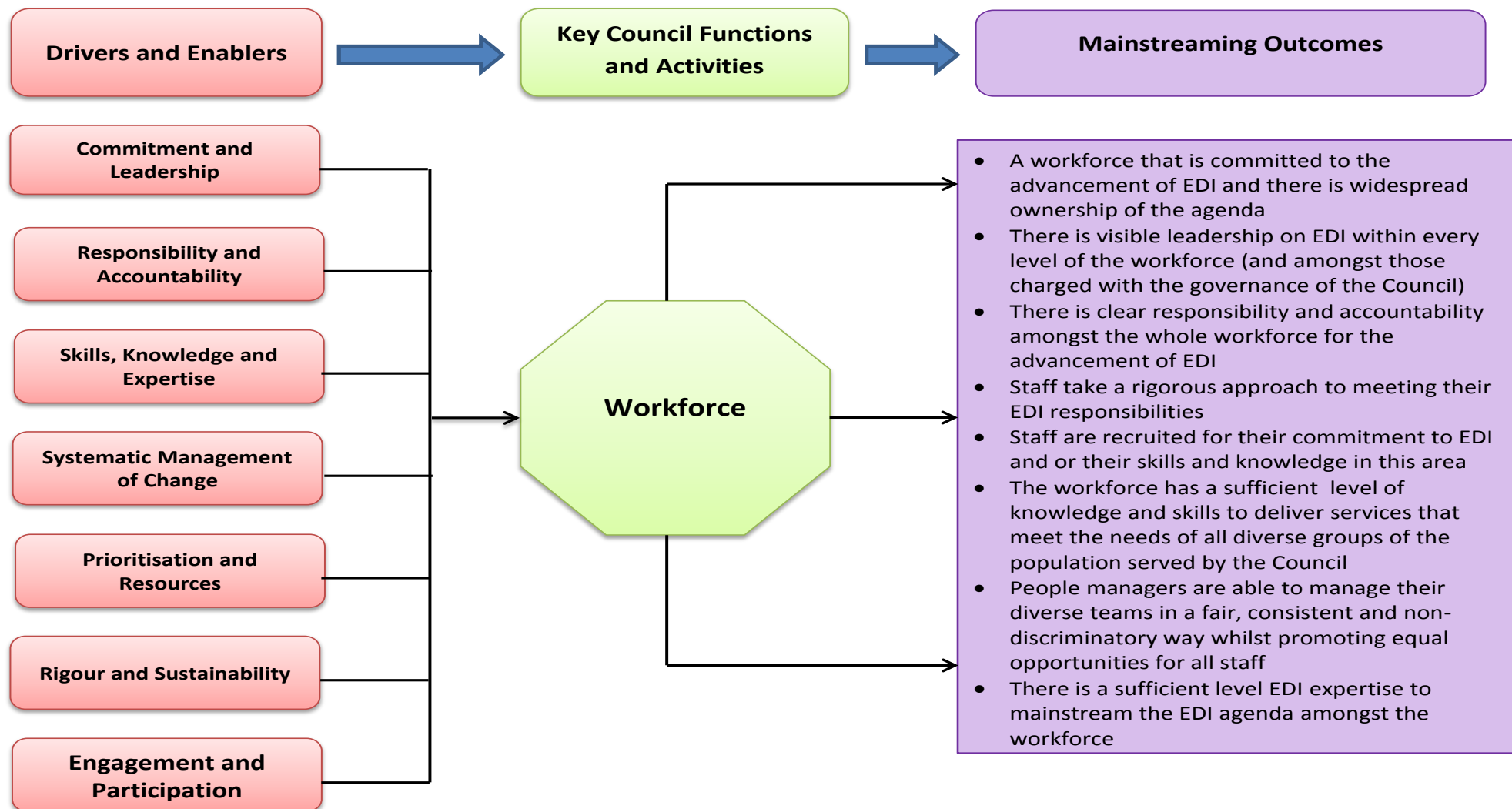
No.	Recommendation
13	It would be helpful to appoint a designated Senior Lead for workforce race equality in each directorate.
14	<p>Accelerating the refresh of the Council's EDI communications approach would ensure that:</p> <ul style="list-style-type: none"> • It is high profile; • Key messages (such as the importance of race equality in the Council) reach all staff; • It informs staff of progress made on race equality and reflects the experiences of BAME staff; • Communications support the mainstreaming of race equality.
15	The Council would benefit from developing a partnership agreement with the trade unions on how the Council and the staff trade unions will work together to advance workforce race equality in the future.
16	The capability policy could be strengthened by providing additional guidance to its people managers on the implementation of the policy to avoid a possible indirect negative impact on BAME staff when their performance could be adversely affected by religious or cultural observances/obligations.
17	A review of the Equal Opportunities in Employment Policy Statement would allow the opportunity for it to take into account the current composition of the workforce's ethnic profile and take a proactive stance on positive action for BAME staff and job applicants.
18	<p>A review of the Employee Dispute Resolution Policy would enable the Council to introduce measures such as:</p> <ul style="list-style-type: none"> • Specifying what training hearing officers should receive in relation to race equality and other EDI issues; • Putting provisions in the policy to allow for an expert advisor to assist the hearing officer when there are matters of race or discrimination being raised as part of the dispute; • Implementing similar measures for appeals.
19	The Council's Special Leave policy could be strengthened by taking account of and reflecting the different needs of BAME staff including different cultural requirements.
20	<p>A review and refresh of the Council's arrangements for conducting equality impact assessment (EIA) would ensure that they are:</p> <ul style="list-style-type: none"> • Completed when they should be; • Comprehensive, complete and accurate; • Quality assured with a distinct process in place; • Monitored, managed and well governed.
21	Adopting a third party harassment policy would protect the Council's employees from harassment, violence and aggression from service users and members of the public.
22	Ethnic monitoring of recruitment panels would provide additional insight for the Council on its recruitment and selection practices and enable it to conduct better analysis of the impact of ethnic diversity within the recruitment process.

No.	Recommendation
23	Using this insight, developing clearer arrangements to ensure that all recruitment panels are diverse (including but not limited to being ethnically diverse, with at least one BAME panel member where appropriate) would further promote inclusive recruitment practices.
24	A review and strengthening of the Council's training offer in relation to race equality would help to clarify for all staff the importance of race equality in the Council and what is expected of them.
25	Developing a 'managing a diverse workforce' training programme would equip people managers with the necessary knowledge and skills to manage an ethnically diverse workforce and promote race equality and EDI in relation to workforce issues. The programme would be of greatest impact if it was mandatory for all people managers within the Council.
26	Formally adopting a mainstreaming approach to workforce race equality and the wider EDI work of the Council would lead to meaningful and sustainable positive change.
27	Equipping leaders in the Council to understand and lead the mainstreaming approach would be vital to embedding it in the organisation.

Mainstreaming Equality, Diversity and Inclusion (EDI) Model



Key Council Mainstreaming Outcomes – Workforce



Different Approaches to Managing EDI

Unimportant	Marginal	Secondary	Embedding	Mainstreaming
Equality, Diversity and Inclusion (EDI) has no importance placed upon it. EDI is not seen as an issue that is relevant to the core or the day to day activities of the organisation.	When EDI is treated as a marginal issue it has low and limited importance is placed on it within the organisation. There are minimal connections to the core business and day to day activities of the organisation.	EDI is gaining in importance in organisational priorities. There are some connections to the core business and day to day activities of the organisation.	EDI has significant importance within organisational priorities. There are many connections to the core business and day to day activities of the organisation.	EDI is fully integrated into the core values, key priorities and governs behaviour within the organisation. It is fully integrated into other organisational priorities and values. Everyone in organisation plays an active role in the advancement of EDI.

