

## EDI ACTION PLAN 2022-2023

This plan sets out the actions we will take to deliver Dudley Council’s equality objectives identified in our Equality, Diversity, and Inclusion strategy.

### Theme One: Understanding our diverse customers and residents.

Action	Lead Officer(s)/Directorate	Key indicators/measuring success. Quantitative and qualitative data
<ul style="list-style-type: none"> <li>• <b>Analysis of equality data for our workforce, alongside the new census data, to understand how our workforce compares to the population of the Dudley Borough and to ensure the council’s workforce reflect the community we serve.</b> <ol style="list-style-type: none"> <li>1. <i>On release of new census data, use this information as a comparative tool to benchmark proportionally, to measure if we are reflective of the community we serve, across the whole group of protected characteristics.</i></li> <li>2. <i>Use Census data as a metric for diagnosis.</i></li> <li>3. <i>Encouraging our employees to share their equality data through our scheduled surveys.</i></li> <li>4. <i>Encourage managers to have conversations with their employees about the importance of this data being provided.</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• HR, OD &amp; Inclusion</li> <li>• HR Delivery and Intelligence</li> <li>• CAPA</li> </ul>	<ul style="list-style-type: none"> <li>• % Increase on those sharing their generic equality data to create a reduction of the proportion of “unknown”.</li> <li>• Improve the sexual orientation declarations by employees.</li> <li>• To increase the number of employees who declare their disability status.</li> <li>• To increase the number of employees who declare their ethnicity and faith.</li> <li>• Establish baseline measures.</li> <li>• A clear transparent stance on the reasons why this data will improve our equality offering.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Demonstrate how we can use EDI data to learn more about our workforce and their experience as employees, particularly those with protected characteristics and to use this intelligence to influence decisions/create interventions</b> <ol style="list-style-type: none"> <li>1. <i>Develop evidence-based evaluation to apply to our EDI interventions. (Case studies).</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• HR, OD &amp; Inclusion</li> <li>• Corporate Equalities Group</li> </ul>	<ul style="list-style-type: none"> <li>• Use of relative likelihood calculator, which is a measure used in equalities work by major employers within the borough e.g., NHS, to demonstrate using data to inform decision making.</li> </ul>

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<ul style="list-style-type: none"> <li>• <b>Improving the engagement activities used to communicate with marginalised groups within our Borough, focussing on accessibility to information.</b></li> <li>• <b>Working to ensure engagement decisions are made collaboratively.</b> <ol style="list-style-type: none"> <li>1. <i>Continue to develop the diverse range of ways for people to engage and have their voice heard.</i></li> <li>2. <i>Research how other local authorities communicate with their employees.</i></li> <li>3. <i>Use plain English and ensure publishes policies and documents are accessible.</i></li> <li>4. <i>Review external webpages and incorporate as appropriate additional services i.e., translation services, clear pictures for those who may struggle to interpret the information, and reader compatibility for those who are sight impaired.</i></li> <li>5. <i>Carry out review of language to ensure services/communications are available in languages that reflect our Boroughs most popular dialect but are accessible to those who may have alternative barriers to access information.</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• CAPA</li> <li>• HR, OD &amp; Inclusion</li> <li>• Public Health</li> </ul>	<ul style="list-style-type: none"> <li>• Collecting feedback from customers around our current engagement.</li> <li>• Re-establishing links with community consultation boards through our Public Health Team.</li> <li>• Staff networks attending Corporate Equality Group to bring/raise issues.</li> <li>• Benchmarking accessibility to external websites in comparison with neighbouring local authorities through well-established Equality networks.</li> <li>• EDI Team to feed into Public Health Public Health Inclusion Project and continue to inform part of the consultation process.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Creating sophisticated engagement structures that will result in both formal and informal interactions between our organisation and its diverse communities.</b> <ol style="list-style-type: none"> <li>1. <i>Use feedback from employees and customers to better understand their experiences and find out if people feel that we are making progress.</i></li> <li>2. <i>Develop a range of feedback mechanisms including consultation exercises, focus groups, staff networks, surveys, and informal feedback.</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• CAPA</li> <li>• HR, OD &amp; Inclusion</li> <li>• Digital, Commercial and Customer services</li> </ul>	<ul style="list-style-type: none"> <li>• Clarity of purpose when undertaking community engagement.</li> <li>• Establish realistic expectations of what might be achieved.</li> <li>• Ensure that the organisation has the capacity to develop and implement a strategy.</li> </ul>

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### Theme Two: Demonstrate inclusive leadership and accountability for delivering EDI outcomes across the organisation.

Action	Lead Officer(s)/Directorate	Key indicators /Measuring success quantitative and qualitative data
<ul style="list-style-type: none"> <li>• <b>Using EDI Data to inform inclusive leadership and accountability</b> <ol style="list-style-type: none"> <li>1. <i>The improvement in the collection of data will improve our ability to see where change needs to happen in the organisation and enable our leaders to understand where improvements need to be made both from a personal and organisational perspective.</i></li> <li>2. <i>Demonstrate how we can use this data to learn more about our workforce and influence decisions/create interventions.</i></li> <li>3. <i>Develop evidence-based evaluation to apply to our EDI interventions. (Case studies)</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• Staff Networks</li> <li>• EDI Team</li> <li>• Corporate Equalities Group</li> </ul>	<ul style="list-style-type: none"> <li>• Using the new EDI data set to influence training needs.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Improvement of “Leadership Development Programme” ensuring key areas of diversity and inclusion are included in this.</b> <ol style="list-style-type: none"> <li>1. <i>Upskill and embed leaders in EDI through programme.</i></li> <li>2. <i>Ensuring specific weighting for EDI experience in the delivery of leadership development programmes is reflected in the tendering process for potential external providers.</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• HR, OD &amp; Inclusion</li> <li>• Senior Manager for OD</li> <li>• External partners tasked with delivering</li> </ul>	<ul style="list-style-type: none"> <li>• In the proposed tender specification, there are clear references to EDI and a weighting for the tender evaluation for people to demonstrate it.</li> <li>• When we score the bids, the criteria are: What practices do you have in place to promote and uphold ED&amp;I both within your own organisation and within training delivery?</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Improving the mandatory E-learning offering, ensuring the EDI module(s) are up to date.</b> <ol style="list-style-type: none"> <li>1. <i>Ensure e-learning modules are regularly reviewed and updated to reflect the state of the nation and our ever-changing borough profile.</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• HR, OD &amp; Inclusion</li> <li>• Learning and Development</li> </ul>	<ul style="list-style-type: none"> <li>• New/improved EDI mandatory modules for all employees.</li> <li>• Ensure it is kept up to date with anyone going legislative changes in accordance with the Equality Act.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Explore working towards achieving national Disability Confident Leader, as opposed to employer.</b></li> <li>• <b>Explore plans to submit to the Stonewall Workplace Equality index</b></li> </ul>	<ul style="list-style-type: none"> <li>• HR, OD &amp; Inclusion</li> <li>• Corporate Equalities Group</li> </ul>	<ul style="list-style-type: none"> <li>• Identify steps needed to be taken to be able us to advance to the</li> </ul>

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<ul style="list-style-type: none"> <li>• <b>Join stonewall diversity programme</b> <ol style="list-style-type: none"> <li>1. <i>Meet requirements to become a Disability Confident Leader – plan how to achieve requirements.</i></li> </ol> </li> </ul>		<p>next level as per the external companies' requirements.</p> <ul style="list-style-type: none"> <li>• Submit both stonewall applications.</li> <li>• To further embed LGBTQ+ inclusion.</li> <li>• To attract and retain staff.</li> <li>• To further develop the LGBTQ+ Staff Network "Proud to be me".</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Ensure Equality Impact Assessments are completed for all new People Policies made by HR, OD &amp; Inclusion services from April 2023.</b></li> </ul>	<ul style="list-style-type: none"> <li>• HR, OD &amp; Inclusion</li> </ul>	<ul style="list-style-type: none"> <li>• Governance system introduced around policy creation, completion and sign off.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Update our current equality impact assessment both initial, and full length to ensure all protected characteristics have been wholly considered.</b> <ol style="list-style-type: none"> <li>1. <i>Deliver training to those who use them to ensure they have the skills and knowledge to consider all characteristics.</i></li> <li>2. <i>Create guides to support those filling in EIAs for support.</i></li> <li>3. <i>Explore and trial initial EIA sheets for projects.</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• HR, OD &amp; Inclusion</li> </ul>	<ul style="list-style-type: none"> <li>• New style EIAs created by EDI Manager.</li> <li>• Training delivered by May 2023 to ensure those with responsibility can complete.</li> <li>• Gathering feedback from EIA project trial sheets and deciding on implementation if there is a positive impact on consideration.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Develop guidance for managers for inclusive practice on managing employees who may need reasonable adjustments</b> <ol style="list-style-type: none"> <li>1. <i>Explore the integration of an inclusive management toolkit, to the new managers induction process, that aims to encourage best practice and consistency and to embed inclusive practice in everything managers do to manage employees and deliver services.</i></li> <li>2. <i>Pilot of the Carers passport.</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• OD</li> <li>• EDI Team</li> <li>• Carers staff Network</li> </ul>	<ul style="list-style-type: none"> <li>• Improvement in employee exit feedback in areas of staff feeling their voice is heard.</li> </ul>

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<p>3. <i>This also seeks to address feedback from staff on the inconsistencies in management practice when supporting staff in career development.</i></p>		
<ul style="list-style-type: none"> <li>• <b>Implementation of mitigating actions identified for EDI in the Corporate Risk register</b></li> </ul>	<ul style="list-style-type: none"> <li>• Audit</li> </ul>	<ul style="list-style-type: none"> <li>• Improvement in terms of the level of risk identified for equality in the corporate risk register.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>To ensure transparency in decision making as part of our responsibilities within the Public Sector Equality Duty</b></li> </ul>	<ul style="list-style-type: none"> <li>• All directorates/service areas responsible for delivering services and/or making decisions impacting people.</li> </ul>	<ul style="list-style-type: none"> <li>• Publish equality reporting.</li> <li>• Completion of EIAs internally.</li> <li>• Internal governance oversight for EIA process.</li> </ul>

## EDI ACTION PLAN 2022-2023

### Theme Three: Ensuring the integration of equality objectives into the commissioning, procuring and delivery of services.

Action	Lead Officer(s)/Directorate	Key indicators /Measuring success quantitative and qualitative data
<ul style="list-style-type: none"> <li>Consider future work/projects to ensure that by 2025 equality and diversity is built into our processes and procedures around procurement and commissioning.</li> </ul>	<ul style="list-style-type: none"> <li>HR, OD &amp; Inclusion Services</li> <li>Digital, commercial and customer services</li> </ul>	<ul style="list-style-type: none"> <li>Identification of areas where equality is already used in procurement.</li> </ul>
<ul style="list-style-type: none"> <li>Exploration of an action plan on how to create the appropriate guidance for our suppliers on the equality requirements for the procurement and commissioning process.                             <ol style="list-style-type: none"> <li>Work towards creating a model that helps to ensure that the organisations we purchase or commission services from respect equality and diversity, by creating the appropriate guidance for our suppliers on the equality requirements for the procurement and commissioning process.</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>HR, OD &amp; Inclusion</li> <li>Digital, commercial and customer services</li> </ul>	<ul style="list-style-type: none"> <li>Template guide created, and feedback from key stake holders gathered.</li> <li>Review areas where Equality standards are already used in commissioning for bench marking purposes.</li> </ul>

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### Theme Four: An engaged workforce that reflects the diverse community we serve.

Action	Lead Officer(s)/Directorate	Key indicators /Measuring success quantitative and qualitative data
<ul style="list-style-type: none"> <li>• <b>Improve our Recruitment Practice and process</b> <ul style="list-style-type: none"> <li>• <i>Review policy, procedure, and process, to tackle the services and directorates where there is evidenced underrepresentation.</i></li> <li>• <i>Reduce the proportion of ‘unknown’ equality data we hold on our employees to help inform recruitment decisions made.</i></li> <li>• <i>Reach a wider pool of potential applicants, the Dudley Council LinkedIn page is to be revised to promote the work of the Corporate Equality Groups and Staff networks to encourage people to want to work for Dudley MBC.</i></li> <li>• <i>Ongoing monitoring of recruitment data for route cause analysis. at the following stages</i> <ul style="list-style-type: none"> <li>i. <i>Application</i></li> <li>ii. <i>Shortlisted</i></li> <li>iii. <i>Interviewed</i></li> <li>iv. <i>Successful.</i></li> </ul> </li> <li>• <i>Revise mandatory recruitment and selection training for all recruiting managers.</i></li> <li>• <i>Amend current equality in recruitment statement to encourage more applicants from a diverse background</i></li> <li>• <i>Use relative likelihood calculator during various recruitment processes, to identify specific areas/services where more direct action needs to be taken to create bias interrupters.</i></li> <li>• <i>Introduction of anonymised recruitment process.</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• HR, OD &amp; Inclusion Services</li> <li>• Recruitment, payroll, and pensions</li> <li>• Policy Officer</li> <li>• CAPA</li> </ul>	<ul style="list-style-type: none"> <li>• Start to record the Relative likelihood of employees being appointed from shortlisting across posts to inform future recruitment improvements.</li> <li>• Use of relative likelihood calculator as per the NHS WRES and WDES calculators; compares the likelihood of white employees being appointed with the likelihood of minority ethnic employees being appointed (ratio)</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Work with our Staff Networks, Trade unions and “equality champions” to reduce the numbers of grievances related to discrimination</b> <ol style="list-style-type: none"> <li>1. <i>Use exit data information and reports to inform intervention.</i></li> <li>2. <i>Exit monitoring interview EDI questions to be reviewed annually, to identify employees’ journey at Dudley MBC, to inform employee experience improvement.</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• Corporate Equalities Group</li> <li>• HR, OD &amp; Inclusion</li> <li>• HR Delivery and Intelligence</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to grow and develop staff networks.</li> <li>• Continuation of meetings between HR, OD &amp; inclusion, and Trade unions.</li> </ul>

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<p>3. <i>Monitoring of equality outcomes such as employee experience, staff survey, workforce data, and exit interviews.</i></p>		
<ul style="list-style-type: none"> <li>• <b>Report our statutory requirements and obligations i.e., gender pay gap, and explore how we will include intersectionality, focussing on best practice such as, full ethnicity pay gap reporting by 2025.</b> <ol style="list-style-type: none"> <li>1. <i>Improve current Gender pay gap reporting style; to include progress and steps taking to address inequality.</i></li> <li>2. <i>Ensuring our reporting on pay policy, gender pay gap and progress with equality strategy occurs at the same time</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• HR, OD &amp; Inclusion</li> </ul>	<ul style="list-style-type: none"> <li>• Implement recommendations from the gender pay gap report to reduce pay gap.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Our workforce data will allow us to create appropriate EDI interventions to improve negative trends, behaviours, and patterns.</b> <ol style="list-style-type: none"> <li>1. <i>The aim is to benchmark the data set against data from other similar local authorities, as well as providing comparisons against the local demographics of the borough. We must encourage the sharing of EDI data from our workforce to improve the quality of the data we hold.</i></li> <li>2. <i>In addition to this data providing a snapshot in time of EDI in the council, it will also enable us to undertake in-depth analysis/deep dives to pick out key behavioural indicators which can then be used to influence training/policy/procedure/practice.</i></li> <li>3. <i>Continue to organise communications and events to increase understanding regarding marginalised groups e.g trans awareness training, British Sign Language training.</i></li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• EDI Team</li> <li>• HR Delivery and Intelligence</li> </ul>	<ul style="list-style-type: none"> <li>• Monthly equality reports produced for the EDI Manager, HRLT and senior officers to be able to sense check trends in the council at the right time.</li> <li>• Data produced to enable EDI team/HRLT to calculate probability around grievances, sickness, and disciplinary in different service areas/directorates to apply interventions.</li> </ul>