

# **Equality, Diversity and Inclusion Draft Strategy**

# 1. Introduction

This document is a draft strategy setting out Portsmouth City Council's proposed approach to improving equality, diversity and inclusion over the four-year period (2024–2027). It has been drafted for review by Cabinet before going to public consultation ahead of a final strategy being adopted.

It is based on the Local Government Association (LGA) Equality Framework for Local Government 2021 (EFLG) and outlines how the council plans to improve in each of its four modules to initially progress from its current level of developing to reach achieving level, as part of a longer-term aim to gain a rating of excellent level.

The draft strategy was developed in consultation with officers across the council and was informed by research and engagement with residents with protected characteristics, as defined in the Equality Act 2010, or those representing them, through a survey and two workshops. Wider consultation is planned on the draft strategy once it is approved by cabinet.

## 2. Our commitment and mission statement

As a council we are strongly committed to equality, diversity and inclusion and will endeavour to ensure that we go beyond our legal obligations in these areas and continually look to improve our processes and policies to ensure they deliver for all our residents in all our communities. The following mission statement was developed in collaboration with our communities:

### Mission statement

*We believe and recognise that the diversity of our population is one of our greatest strengths and assets. We will champion diversity, equity and inclusion, cultivating a safe environment for staff, residents and businesses to achieve their full potential through empowerment, innovation and freedom of expression. We will work with staff, communities and partners to eliminate discriminatory barriers and ensure that everyone within Portsmouth has a sense of shared, common belonging and understanding.*

## 3. Legislative context

The Equality Act came into force on 1 October 2010. The act brought together more than 116 separate pieces of legislation into one single act. Combined, the act provides a legal framework to protect the rights of individuals and to advance equality of opportunity for all.

The act covers discrimination because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation – these are protected characteristics.

The act simplifies and strengthens previous legislation to provide a new discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

The general equality duty (set out in the equality act) places upon public authorities a requirement to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the act.

- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

The act explains that having due regard for advancing equality involves:

- Removing or minimising difficulties suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is extremely low.

Specific Duties were introduced by the Government in September 2011 with an aim of facilitating an efficient and effective compliance of certain public bodies with the general Equality Duty. This includes:

- Publishing information to demonstrate compliance with the general equality duty annually
- Preparing and publishing one or more equality objectives that will contribute to satisfying the three aims of the general Equality Duty (as above) every four years.

## **4. Objective**

Ultimately the aim is for the council to consistently achieve excellent level across all areas of the EFLG. Given the council's current position as developing, a realistic objective for the period this strategy covers would be to move the council to achieving level and set in place the foundations to reach excellent level in the future. Trying to go beyond achieving at this stage would likely require considerable extra dedicated resource, which would need to be identified and may not be possible considering inflation-related budget pressures.

## **5. Responsibilities**

Departments across the council are responsible for ensuring their projects and business-as-usual services meet the needs of everyone who lives in, works in or visits Portsmouth from an equalities, diversity and inclusion perspective.

There is corporate support available from an equalities and diversity officer but the available resource is a part-time role meaning they do not have capacity to take on responsibility for the entire organisation's equalities work but instead provide the support and expertise to empower every part of the council to develop and deliver the services all of our communities need.

The equalities and diversity officer will also play an important role in monitoring delivery of work outlined in this strategy and they will also liaise with senior representatives from across the council who can act as a conduit to disseminate and gather information and insight across the organisation, particularly where wider approaches to projects or policy need to be corporately agreed.

Section 8 of this document is an overview of work planned to enhance the council's performance in relation to equalities, diversity and improvement, a separate action plan will sit alongside this defining lead officer(s) and timescales for each piece of work. Lead officers will be responsible for reporting progress to the equalities and diversity officer and this will

inform quarterly reporting the equalities and diversity officer delivers to Governance & Audit & Standards Committee.

## 6. Consultation

In developing the strategy it was important to engage specifically with those who would be most affected, those with protected characteristics. Through a range of organisations in the voluntary and community sector the people with protected characteristics, and individuals or groups who represent them, were invited to take part in a survey and workshops. A total of 263 people took part in the survey and 28 people attended two workshop sessions, as well as 10 members of Portsmouth Youth Cabinet taking part in a dedicated session. When compared to 2021 census data for Portsmouth, the demographic information provided by participants showed the exercise was successful in specifically engaging people likely to be negatively impacted by their protected characteristics, with those groups making up a higher proportion of or the sample than would be typically seen in Portsmouth, as illustrated by the data in the table below.

Characteristic	Census 2021 Portsmouth (%)	Survey respondents (%)	Workshop participants (%)
Sexual orientation other than heterosexual	5	21	12
Identifying with a gender different to sex registered at birth	0.7	2	4
Ethnic group other than white British	22	27	59
Have a disability	20	22	26

Both the survey and workshops were used to gauge views on the sort of activity residents would value within different areas of the EFLG. A key theme throughout was a desire to see more information on council services shared with a wider range of communities, including targeting work to reach specific groups where possible. Feedback was used, along with information gathered during an EFLG self-assessment, to help prioritise areas of work being taken forward.

**[A full report on the consultation to inform the draft strategy is available on the council website.](#)<sup>1</sup>**

## 7. The LGA Equality Framework for Local Government 2021

As part of its support to councils the LGA has developed the Equality Framework for Local Government (EFLG) to help local councils meet their obligations under the Equality Act 2010 including the Public Sector Equality Duties.

The equality framework is intended to help councils:

- Deliver accessible, inclusive and responsive services to customers and residents in their communities including those from under- represented groups.
- Employ a workforce that reflects the diversity of the area they are serving.
- Provide equality of opportunity for all staff.

<sup>1</sup> <https://yourcityyoursay.portsmouth.gov.uk/equality-diversity-and-inclusion-edi-draft-strategy-research/>

- Meet the requirements of the Public Sector Equality Duty and support any aspirations to exceed these.

It seeks to do this by:

- Identifying the areas of activity that councils need to address to deliver good equality outcomes.
- Helping councils to understand how they can build equality into processes and practices.
- Supporting organisations to become inclusive employers.
- Enabling councils to informally self-assess their progress on the equality improvement journey and determine where and how they need to improve.

The framework sets out four modules for improvement, underpinned by a range of criteria and practical guidance that can help a council to plan, implement and deliver real equality outcomes for employees and the community. The four modules are:

- understanding and working with your communities
- leadership, partnership and organisational commitment
- responsive services and customer care
- diverse and engaged workforce

For each module there are three Levels. Developing, Achieving and Excellent. The levels are progressive and cumulative so an organisation can plan and chart its progression against different priorities. Councils can be at different levels of the framework for different modules or themes.

**The LGA website has full details of the EFLG.<sup>2</sup>**

To develop this strategy a self-assessment of the council was carried out against the EFLG criteria and found to be at the developing level. The following sections of this document outline a summary of self-assessment of the four module areas and the full version can be seen in Appendix 1.

## **7.1. EFLG module 1 – Understanding and working with your communities**

Current level – developing

Summary – Currently good use of data in many areas but would benefit from wider sharing and a mechanism for staff to share and access data. A lot of good community engagement work is undertaken but some areas show gaps around under-represented groups.

## **7.2. EFLG module 2 – Leadership, partnership and organisational commitment**

Current level – developing

Summary – Leadership is committed to equalities and a coherent vision is in place with equality featuring prominently. More consistent use of the good practice in place is needed with some gaps currently existing.

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<sup>2</sup> <https://www.local.gov.uk/publications/equality-framework-local-government-eflg-2021>

### **7.3. EFLG module 3 – Responsive services and customer care**

Current level – developing

Summary – Some examples of excellent rating in this area but need more consistent application across the organisation. The Social Value procurement framework has big potential to benefit this area but would need a specific focus on equalities.

### **7.4. EFLG module 4 – diverse and engaged workforce**

Current level – developing

Summary – Equality and diversity is being considered across all areas of the workforce, while some of this work is in its infancy there are plans in place to make improvements.

## **8. Work planned to enhance equalities, diversity and inclusion**

There is a range of work planned to be delivered across the council which will enhance the organisation's approach to equalities diversity and inclusion. It largely falls into four key areas which are detailed below.

The work listed is indicative and fuller details are part of a separate action plan including timelines which will be used to report to Governance & Audit & Standards Committee. The action plan will be a live document with new areas of work added to it as they begin.

### **8.1. Improve use of data in the organisation**

Making data more widely available and better used across the council by introducing an equalities data dashboard, improving diversity monitoring across services and making sure departments are aware of a wider range of key contacts to engage relevant communities and stakeholders.

### **8.2. Building better community relationships**

Developing the relationship between the council and different communities across the city through a range of work including delivering the Social Housing Charter; our Health & Wellbeing Strategy; expanding our social value commitment to create greater local benefits; continuing to develop our Live Well events which help services reach residents in their local area; and increasing participation in public life through the Volunteering Futures project.

### **8.3. Embed greater awareness of equalities across the organisation**

Firmly embedding the integrated impact assessment process within the organisation; improving awareness and use of reasonable adjustments for those that need them; providing new equalities, diversity and inclusion training for councillors; delivering our new customer service strategy; embedding responsibility for equalities in an appropriately senior forum in the organisation and introducing quarterly equalities reporting to Governance & Audit & Standards Committee.

## **8.4. Supporting our staff and creating a more diverse workforce**

Making sure our staff have the equalities, diversity and inclusion support they need through refreshing the council values and behaviours framework; developing staff networks and support groups; a new needs-driven approach to wellbeing initiatives; new diversity monitoring for job applicants; developing career pathway opportunities; a new data dashboard for managers which supports equalities; and improved guidance on making reasonable adjustments for staff.

# **Appendix 1**

## **Portsmouth City Council equalities self-assessment**

Ahead of work on Portsmouth City Council's new equalities and diversity strategy, a self-assessment exercise has been carried out for the organisation using the Local Government Association's Equality Framework for Local Government.

The overall result is Developing. Details for each of the four modules are below.

### **Module 1: Understanding and working with your communities**

Level: Developing

#### **1. Collecting and sharing information**

Level – Developing

Many specific areas use both national and local data well but outside of the department dealing with a topic there is limited understanding of what data might be available.

Data is gathered and published as part of various projects, such as the cost-of-living dashboard, lessons learnt from this best practice can be shared across the organisation. Some good examples of directorates such as Public Health and Children, Families and Education working closely with their partners and sharing information.

Specific areas scored some of the Achieving criteria, such as employing best practice by using qualitative and quantitative methods to gather data and information, and disaggregating it using the same or similar categories, but this is not done consistently.

Market Research advise on best approach to consultation when contacted but across the organisation may be inconsistencies in diversity monitoring. It is worth noting that directorates are keen on making sure consultation is proportionate and best suited and decide on framework on case-by-case basis.

Across the organisation there are pockets of Excellent, such as Culture, Leisure and Regulatory Services regularly updating data and using it to set priorities across the directorate and services to support specific needs of geographical areas or residents with specific needs and characteristics. They achieve this through quarterly KPI data collection and reporting, which can be used by services to update and inform operational plans. However, this is not done consistently across the whole of the organisation. Feedback identified additional central resource would be helpful to improve data collection, sharing and analysis so that it can be used to set priorities.

## **2. Analysing and using data and information**

Level – Developing

Good work is happening within many distinct areas but there is there is no clear consistency across the organisation. A process for effective knowledge sharing within the council would be a very helpful first step to find out what information we have and how compatible the data sets might be. Difficulties include different data sets not being compatible with one-another, sensitive/ confidential data and being able to marry up different sets of data.

Gaps were identified around using data effectively as part of integrated impact assessment (IIA) and risk assessment processes, as often limited data is available. Across the organisation, systems are being developed to analyse soft and hard data/intelligence about communities, their needs, and aspirations.

Children Families and Education directorate and the Strategic Intelligence and Research team within Public Health are performing well in this area, meeting some of the Achieving and a few of the Excellent criteria but this is not done consistently across the organisation.

## **3. Effective community engagement**

Level – Achieving

Responses notably differ between departments. In the majority of areas integrated engagement mechanisms and structures are in place to involve stakeholders in scrutinising service delivery, decision-making and progress. Many specific areas engage with all communities when making decisions, including those from under-represented groups, a good example of this is the co-production process Adult Social Care used when creating the Autism Support Hub and looking at the needs of neurodiverse community in the city. Regeneration directorate also demonstrated good work in targeted engagement of underrepresented groups, while Children, Families and Education scored highly on these criteria but advised that additional resource would allow them to increase the involvement of all under-represented groups in all consultations.

While the majority of areas are performing to a good standard, there are some gaps such as consistent approach to engagement and evidencing engagement with under-represented groups – it is not clear if this is because of a lack of routine diversity monitoring or other issues such as a need for better relationships between communities and the council.

Culture, Leisure and Regulatory Services and Children, Families and Education show examples of excellent practices, meeting some of the Excellent criteria, such as working with their partners to improve performance on good relations in the community and where resources permit cater for difference, even where there is very limited or no actual representation within a local demographic. Challenges noted include a need for more resource to reach out to under-represented communities outside of the usual channels used to promote engagement activities and knowledge sharing across the organisation about who key contacts are.

## **4. Fostering good community relations**

Level – Developing.

Structures are in place within the organisation and across partnerships to understand community relationships and map community tensions, these include a bi-weekly community tension monitoring meeting chaired by Hampshire Police, although this may benefit from wider



participation. The quarterly Prevent board discusses community tensions and has access to the LGA Special Interest Group on Counter Extremism, this provides opportunities for roundtable discussions and communication briefings. The newly re-established community tasking and coordinating group monitors tensions to some extent.

In terms of harassment and hate crimes being monitored and analysed regularly, the Community Safety Partnership strategic assessment analyses hate crimes, and the police provide an update to the Prevent board on hate crime specifically. Specific support for council housing tenants is available through a hate crime officer in Housing. The Home Office has suggested developing a disruption policy for use in managing a serious incident of hate crime or related protest/demonstration, this may be more practical as part of a wider piece of work, if pursued it would help progress towards Achieving level.

## **5. Participation in public life**

Level – Developing

The organisation has some understanding of the level of participation in public life by different communities/protected characteristics. This can include involvement in local democracy and representation e.g. school governors, councillors, board members of voluntary/statutory sector organisations.

The consensus is that additional resource would assist in more targeted outreach work and public campaigns to reach under-represented communities and enhance participation in public life. Some directorates advised that all section of the community are involved in public life, however diversity monitoring data is not routinely collected, therefore this could be anecdotal.

## **Module 2: Leadership, partnership, and organisational commitment**

Level – Developing

### **1. Political and officer leadership**

Level – Developing

The political and executive leadership have publicly committed to reducing inequality, fostering good community relations, and challenging discrimination. Many specific areas feel their leadership champions the equalities, diversity and inclusion (EDI) agenda, but there are some gaps in business as usual embedding of EDI practices across the organisation. The idea of regular training and awareness to ensure that leaders are up to date with EDI related matters was raised.

Some areas scored Achieving and Excellent criteria, such as acting as ambassadors and managing conflicting needs and community tensions, but this was not consistently across the whole organisation and in places there were slight gaps in the Developing criteria.

### **2. Priorities and working in partnership**

Level – Achieving

There is a coherent, shared vision of equality for the local area, with clear priorities which have been agreed and understood by all key stakeholders, including the voluntary and community sector. This can be evidence with the City Vision work, where consultation was broad and

robust to ensure marginalised groups took part. One of the most important values identified as part of the City Vision is equality. There is evidence of looking beyond traditional partners to include the voices of smaller influencing organisations. Frameworks such as Social Value can be flexed to support particular groups or particular outcomes. There are high level statements within the corporate and partnership documents relating to equalities, however these could be more explicit in places or detail that specific issues will be defined in underlying documents.

### **3. Using equality impact assessment**

Level – Developing

This is a very strong Developing and close to Achieving in areas. Many specific directorates have embedded the IIA process, but a further benefit might be ensuring IIAs are completed at the outset of projects. Further training could assist with this to compliment an updated IIA form which will be rolled-out to the organisation this year. Drop-in training sessions will take place and the Equality and Diversity Officer is available for consultation on Equality Impact Assessment (EIA). This should allow for the EIA to be robust and meaningful.

There are pockets of Excellent, such as willingness to take measured risk to progress the EDI agenda in specific areas, but other areas do not perform as well. Overall, due regard is taken to the aims of the general equality duty when conducting business as usual, making decisions and when setting policies. The next step of ensuring that equality analysis/impact assessments are integrated systematically into planning, decision making and performance reviews across the organisation and based on this assessment this should be easily achievable by introduction of the new form, training and raising awareness.

### **4. Performance monitoring and scrutiny**

Level – Developing/Achieving

Appropriate structures are in place to ensure delivery and review of equality objectives in the form of the EDI Steering Group, but how information cascades from there to specific service areas is inconsistent. There are pockets of Excellent, relating to Scrutiny Panels and specific areas assessing their performance and outcomes against comparable organisations. With the introduction of the EDI strategy and toolkit the organisation should move to Achieving level by meeting criteria around setting and monitoring of equality objectives which are subject to challenge and linking to the political overview and scrutiny process.

## **Module 3: Responsive services and customer care**

Level: Developing

### **1. Commissioning and procuring services**

Level – Developing/Achieving

The organisation is working to ensure that procurement and commissioning processes and practices take account of the diverse needs of clients, and that providers understand the requirements of the public sector equality duty. The organisation has an established Social Value Framework, where the social value of contracts is measured, but there is no specific focus on equalities, it is just one of a number of areas suppliers can deliver social value. There may be potential to enhance the focus on equalities within which could meet Excellent criteria but this is something that would need to be explored further.

## **2. Integration of equality objectives into planned service outcomes**

Level – Developing

There are significant inconsistencies with some areas meeting Achieving and Excellent criteria and others scoring lower. Successes are around objectives are SMART, past performance is reviewed and gaps are identified in who is and isn't using the services. It seems many service plans are not written with equality objectives in mind and objectives are not underpinned by equality analysis. A feature of feedback was departments a lack of training or resource (time and budget) makes embedding equality objectives into planned service outcomes and business as usual challenging.

## **3. Service design and delivery**

Level – Developing

Overall, the organisation has systems to collect, analyse and measure how satisfied sections of the community are with all services. Specific areas advised there are examples of where the human rights of individuals have been threatened and the organisation has ensured that they are safeguarded and safeguarding outcomes for under-represented groups improved, which are both Excellent criteria.

Feedback suggests a lack of data, systems, and resource to identify current participation, while satisfaction data is not disaggregated based on protected characteristics, and these are areas that need to be improved in order to measure whether all sections of the community are able to access services.

## **Module 4: Diverse and engaged workforce**

Level – Developing

### **1. Workforce diversity and inclusion**

Level – Developing

The organisation understands its local labour market and has mechanisms in place to monitor its workforce against protected characteristics. HR is working on improving data gathering and workforce profile so comparisons can be made with Census 2021 data sets. Specific areas are working on diversifying recruitment and ensuring under-represented groups are represented, this is done in tandem with HR. The organisation continues to support, engage with and grow employee network groups to progress the work on wider equality, diversity and inclusion. Resource would assist in facilitating staff network groups, setting clear terms of reference, and promoting participation. There is ongoing work on embedding values and behaviours linking in new performance management processes to assist with fairness, equality, and inclusive culture.

### **2. Inclusive strategies and policies**

Level – Developing

The organisation's workforce strategies and policies include equality considerations and objectives. New and major changes are assessed via the IIA. Some Achieving criteria are met, such as having set of policies and practices to enhance workforce equality and diversity including equal pay, flexible working and family friendly policies, harassment and

bullying incidents being monitored and analysed and staff led equality networks have been established. There is also ongoing work to develop recognised steps for reasonable adjustments and improvements to process to report bullying and harassment. It was noted where it is necessary to implement positive action into policies and processes specific project support may be required, this may be around recruitment, training and policy changes.

### **3. Collecting, analysing, and publishing workforce data**

Level – Developing

Work is underway to improve data gathering relating to HR processes in an employee's lifecycle (such as recruitment, onboarding, training, grievances, and leavers) although a specific resource to support this would be required to inform where change and positive action is needed. A review of job advertisements, job design and interview processes will be undertaken to assess whether they are inclusive. Training and setting performance metrics will be implemented to measure effectiveness. Additional resource is required to increase capacity to be able to provide improved accurate workforce data recording and reporting with regular access for HR and managers.

### **4. Learning, development, and progression**

Level – Developing

Assessments of the training, learning and development needs of members and officers, in order that they understand their equality duties and take action to deliver equality outcomes, is inconsistent. An assessment is being undertaken as to what equality-related training, learning or development is required in the organisation. There is currently no easy way of knowing if course advertisement is reaching all staff and this needs to be investigated, also there is currently no specific support for the progression of under-represented groups but this is an area being looked at. There is also an opportunity to look at ways of improving appraisals to have more focus on equality and diversity. Additionally, a review of exit interview data is being completed to understand changes in the workforce profile and identify trends affecting career progression that are linked to equality. For the organisation to progress to the Achieving category, a learning management system that supports a talent management approach, tracks training and supports career progression is required as this would feed into the above analysis. Additionally, recruitment of a project support officer would assist with the development of career pathways and performance framework, also linked to behaviours framework (as per the Workforce diversity and inclusion category above).

### **5. Health and wellbeing**

Level – Developing

The organisation has begun to consider how EDI issues are linked to employee health and wellbeing. Alignment of wellbeing coordinator and absence management has commenced so that wellbeing initiatives are driven by the needs of the workforce and introduction of hybrid working to enhance flexible working. An Employee Assistance Program is available. Training has been secured for staff development relating to wellbeing. Work that needs to progress in all areas is related to promotion of a positive health and wellbeing culture throughout all levels and areas of the organisation, linked to values, behaviours, flexible working, and wellbeing champions. The above evidence illustrates that the organisation has assessed all aspects of the working environment to ensure the health and safety needs of all its employees are met

including around COVID-19. A range of inclusive mechanisms are in place to engage and involve staff. The organisation has considered working arrangements and patterns in the light of the COVID pandemic. Resource to work with wellbeing champions is required to improve staff wellbeing across all services with an EDI lens and evaluate the impact of current initiatives on wellbeing and absence levels.



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