

# ACHIEVING CUSTOMER SERVICE EXCELLENCE 2018-2022

## Equality and Diversity Document Framework

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# Equality and Diversity Document Framework

Welcome to Dartford Borough Council's Equality and Diversity Document Framework. This Framework consists of six sections, which together fulfil the Council's commitment to ensuring that everyone in Dartford can take full part in the social, cultural and economic life of the Borough.

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## **1.0 COMPREHENSIVE EQUALITY POLICY**

### **1.1 Introduction**

1.1.1 This policy was adopted by the General Assembly of the Council on 22 March 2004. It was updated in 2011 to reflect changing legislation and then refreshed in 2015 and then in 2018. This policy details Dartford Borough Council's commitment to achieving equality of opportunity in everything that it does. The policy, before adoption, was subject to widespread consultation with elected Members, employees, community groups, external partners and service users. The adopted policy reflects the responses received to that consultation.

### **1.2 Why we need a policy**

1.2.1 The Council recognises that all its roles and functions will have an impact on different groups and individuals in different ways depending upon their backgrounds, cultures, lifestyles and experiences. This policy demonstrates the Council's commitment to ensuring that everyone in Dartford can take a full part in the social, cultural and economic life of the Borough.

1.2.2 The Council also has a duty to comply with equality legislation, and this policy sets out how the Council does this.

1.2.3 The commitment to improve equality practice will be implemented at both corporate and departmental level. This will be evidenced by the completion of customer access reviews and equality target setting within all departments and service areas.

### **1.3 Policy aims**

1.3.1 The Council wants to achieve equality of opportunity in all its activities, including the delivery of services to the community, as an employer and through various funded activities.

1.3.2 The Council has in place a range of actions to deal with discrimination and victimisation within the communities it serves and its workforce.

1.3.3 An equal opportunities organisation is one which welcomes and manages diversity, using everyone's talents and abilities, and where individual contributions are encouraged and differences valued; it is also responsive to the needs of its employees and the community it serves.

1.3.4 It is important that the Council embraces diversity as a good employer and an effective service provider because:

- A diverse membership reflecting our community results in better informed decision making
- A diverse workforce reflecting our customer base results in a better informed, more adaptable organisation which is closer to the Council's customers
- Improved staff morale helps the Council to retain staff, reducing recruitment costs
- A stable, motivated workforce achieves high productivity and is committed to the Council

## 1.4 Definitions

### 1.4.1 Equal opportunity is:

- Creating a society where everyone can participate and have the opportunity to fulfil their potential
- Tackling all forms of unfair discrimination
- Breaking down barriers for people with protected characteristics<sup>1</sup>

### 1.4.2 Diversity is:

- About individuals and inclusion
- Not treating people less favourably because of obvious differences such as age, race, gender, disability, accent or non-visible differences e.g. beliefs
- Valuing differences
- Harnessing differences to the benefit of both the organisation and the individual, by allowing people with different perspectives and views to use their unique blend of skills and character to improve the quality and performance of the Council
- Aiming to create equality of opportunity for everyone whilst recognising that some people face barriers that others do not
- Better understanding the diverse needs of our customers.

Managing diversity helps to ensure and enhance equality of opportunity and improves the Council's performance by:

- Encouraging Members and employees to maximise their contribution
- Encouraging and supporting Members and employees to develop and improve their skills and abilities
- Valuing and respecting different opinions, styles and perspectives
- Being open to more flexible ways of working for all employees

### 1.4.3 Discrimination is:

The Equality Act 2010 recognises there are six types of discrimination, these are:

- **Direct discrimination:** where someone is treated less favourably than another person because of a protected characteristic
- **Associative discrimination:** this is direct discrimination against someone because they are associated with another person who possesses a protected characteristic
- **Discrimination by perception:** this is direct discrimination against someone because others think that they possess a particular protected characteristic. They do not necessarily have to possess the characteristic, just be perceived to

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<sup>1</sup> The Equality Act 2010 defines what it means by a 'protected characteristic' – see section 1.5.

- **Indirect discrimination:** this can occur when you have a rule or policy that applies to everyone but disadvantages a person with a particular protected characteristic
- **Harassment:** this is behaviour that violates a person's dignity, or creates a hostile, degrading, humiliating or offensive environment.
- **Victimisation:** this occurs when someone is treated badly because they have made or supported a complaint or grievance about discrimination or harassment

1.4.4 A seventh type of discrimination, **harassment by a third party**, where employers are potentially liable for the harassment of their staff by people they do not themselves employ, was repealed on the 1 October 2013.

## 1.5 Legal obligations

### 1.5.1 The Equality Act 2010

The Equality Act 2010 brings together the majority of existing equality legislation into one place so that it is easier to use and strengthens the legislation in some areas. It sets out the protected characteristics that are protected by the law and the behaviour that is unlawful. The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The duty also covers marriage and civil partnership, but not for all aspects of the duty.

### 1.5.2 Public sector equality duty

The Act includes a public sector equality duty which applies to public bodies and others carrying out public functions. Both parts of this duty (the general duty and the specific duties) apply to the Council which has a legal obligation to meet the requirements.

**General duty:** The general duty requires the Council, in the exercise of its functions to have due regard of the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act, through removing or minimising disadvantages suffered by people due to their protected characteristics

- Advance equality of opportunity between people who share a protected characteristic and those who do not. This may involve taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Foster good relations between people who share a protected characteristic and those who do not. This may mean taking steps to meet the needs of people from protected groups where these are different from the needs of other people

**Specific duties:** The purpose of the specific duties is to help certain public bodies comply with the general equality duty, by improving the transparency and focus of activities to meet the duty.

The Council is required to:

- Publish sufficient information at least annually to demonstrate its compliance with the general equality duty across its functions, and include information relating to persons who share a relevant protected characteristic who are employees and other persons affected by its policies and services – this information can be found in [Section 5](#).
- Every four years prepare and publish one or more objectives it thinks it should achieve to meet one or more aims of the general equality duty, which must be specific and measurable – the Council’s equality objectives can be found in [Appendix A](#).

## **1.6 How the Council will meet the Equality Act 2010 duties**

### **1.6.1 Equality monitoring**

The Council carries out equality monitoring, which is the process used to collect, store and analyse data about people’s protected characteristics and how they are affected by a Council’s policies and the services it provides. The Equality Monitoring Policy can be found in [Section 2](#).

### **1.6.2 Translation and alternative formats**

The Council provides customers with information that requires translation or provision in an alternative format so everyone can benefit from Council information and services. The Translation and Alternative Format Policy can be found in [Section 3](#).

### **1.6.3 Customer access reviews**

The Council carries out and publishes customer access reviews. These reviews ensure that policies, services and procedures are examined to ensure the Council meets the three aims of the general duty. Customer access reviews are covered in more detail in [Section 4](#).

#### 1.6.4 Gender pay gap reporting

The Council publishes gender pay gap information on its website on an annual basis to show if there is a difference in the average pay between all men and women in its workforce. This information shows if a gender pay gap exists and helps to identify what action may need to be taken to reduce or eradicate this gap. The information includes:

- the difference between the mean hourly rate of pay of male full-pay relevant employees and that of female full-pay relevant employees;
- the difference between the median hourly rate of pay of male full-pay relevant employees and that of female full-pay relevant employees;
- the difference between the mean bonus pay paid to male relevant employees and that paid to female relevant employees;
- the difference between the median bonus pay paid to male relevant employees and that paid to female relevant employees;
- the proportions of male and female relevant employees who were paid bonus pay; and
- the proportions of male and female full-pay relevant employees in the lower, lower middle, upper middle and upper quartile pay bands.

#### 1.6.5 Complaints

If a member of the public feels that they have been discriminated against in relation to a protected characteristic (see 1.4.3 for definition of discrimination) or treated unfairly, they should report this to the Corporate Complaints Officer or they can download a copy of the form from the Council's [complaints page on the website](#).

The Council will not tolerate any form of discrimination. If, following investigation, there is evidence of discrimination by a Council employee, that employee will be subject to action under the Disciplinary Policy.

#### 1.6.6 Internal complaints

The Council encourages its employees and others with serious concerns about any aspect of malpractice within the organisation, to come forward and voice those concerns through the [Whistleblowing Policy](#).

The main aim of the Whistleblowing Policy is to allow employees and others to speak without fear about very serious wrongdoing/malpractice within the organisation. Complaints by staff will be dealt with under the Grievance or Dignity at Work Policies, as appropriate.

#### 1.6.7 Members of the Council

The Council will strive to ensure that all Members are treated fairly, and are afforded equal access to the facilities and support services of the Council.

The Council will, as far as is practical, endeavour to ensure that Members are not prevented unreasonably from fulfilling their role as elected representatives through unnecessary restriction, such as on the timing of formal meetings.

Members of the Council support this policy and will work towards the promotion of equal opportunities and the elimination of discrimination in all the Council's activities.

#### **1.6.8 Specific resources and actions for improving equality practice**

The Council is committed to providing high quality services, which everyone has access to and will ensure that resources, whether internal or external are provided such that equality issues are taken forward.

Where appropriate, the Council will work through existing partnerships and with other organisations, to provide services which promote equal opportunities to all by:

- Building on our existing good practice
- Systematic consultation, self-assessment, audit and scrutiny, using nationally and locally developed performance indicators
- A commitment to community profiling service delivery and usage
- Monitoring progress and revising targets in all areas of action
- Providing information which is accessible and using appropriate ways of communicating, so that groups within the community can be involved in the consultation processes
- Delivering services which are appropriate to the needs of the community
- Removing barriers which deny people access to our services
- Using our powers to make sure that organisations providing services on our behalf comply with this policy
- Developing a workforce which reflects the community at all levels
- Monitoring recruitment, promotion, training opportunities and take up, pay, grievances and exit from employment
- Making sure that all employees and Members know the effects of this policy and provide appropriate training/workshops
- Making sure that all employees know their rights of protection from discrimination, harassment or bullying
- Developing and promoting policies which give everyone equal access to employment and training opportunities
- Setting performance targets so progress can be measured
- Making sure that all the resident communities know their rights of protection from discrimination, harassment or bullying
- A commitment to workforce profiling

### **1.7 Responsibility for implementing this policy**

- 1.7.1 The Managing Director will have overall responsibility for implementing this policy. Employees must adhere to this policy and take any necessary action where

required. Each Director will take the lead on actions for their Directorate's services. Managers will demonstrate commitment to the policy by incorporating it into their service plans and be responsible for the implementation and monitoring of the policy within their service area.

#### **1.7.2 Management Team**

Dartford Borough Council's Management Team will coordinate the Council's response to the Equality Act 2010.

## **2.0 EQUALITY MONITORING POLICY**

### **2.1 Introduction and purpose**

- 2.1.1 Dartford Borough Council is committed to ensuring that it operates fairly and equitably in both its employment practices and service delivery. The Council will tackle all forms of discrimination and will promote equality and diversity at every opportunity.
- 2.1.2 Effective performance management is critical to the success of the Council in delivering its priorities and the vision for the Borough. Equalities monitoring is a key element of the performance management framework, which is used to continuously improve services the Council delivers and the way they are delivered.
- 2.1.3 Equality monitoring can identify which groups are using the Council's services and how satisfied they are with them. This data can then be used to:
- Highlight possible inequalities
  - Investigate their underlying causes
  - Remove any unfairness or disadvantage
- 2.1.4 This policy aims to ensure a consistent equality monitoring standard across the Council. It covers the reasons for monitoring, taking into account equalities legislation and the Data Protection Act 2018.

### **2.2 What is equality monitoring?**

- 2.2.1 Equality monitoring is the process used to collect, store and analyse data about people's disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation and how people with these protected characteristics are affected by a Council's policies and the services it provides. Broadly speaking, the information collected is used to highlight possible inequalities, investigate their underlying causes, remove adverse impact and promote access to services.

### **2.3 Why collect and monitor equality data?**

- 2.3.1 The adoption of equality monitoring ensures the Council meets the requirements under the equality duty and that its services and employment practices are equitable and appropriate to the needs of the community it serves. Furthermore, equality monitoring is not a one way process being used solely to highlight instances of discrimination. It can also provide effective protection against unfounded allegations of discrimination.
- 2.3.2 Equality data is collected in order to:
- **Ensure effective policies:** unless the Council knows who is, and more importantly who isn't using its services and what people think of them, the Council cannot tell if it is achieving its aims of providing services that are appropriate and accessible to everyone nor whether it is discriminating against certain groups

- **Assist service planning:** monitoring is vital for planning, targeting and measuring development in service provision. It can show inefficiencies in the way the Council organises services and indicates new opportunities to meet people's needs. Monitoring can also help to develop equality objectives which are required as part of the equality duty (see section 1.5) and measure progress of these objectives
- **Value diversity:** ensuring the Council's workforce reflects the community it serves is central to the development of services that respond to local needs
- **Comply with the law:** there is a legal duty to take account of equality issues when planning and delivering services and developing policies (Equality Act 2010)
- **Meet the criteria for accessing financial and other resources from external sources:** many funding organisations now require assurance from bidders that they meet equalities and diversity requirements and standards
- **Provide information for inspections:** the Comprehensive Area Assessment, Local Area Agreement, Strategic Housing etc. inspections all want to know how well the Council is meeting the needs of all sections of its community and want evidence to prove it
- **Improve service quality:** challenging inequality will improve the quality of the Council's services because it ensures the Council is delivering its services in the most appropriate way to meet the needs of all Dartford residents
- **Achieve standards:** the Council is obliged to provide information for performance indicators about the provision of services. It is therefore vital that equality monitoring is embedded in its performance management framework

## 2.4 What to monitor?

2.4.1 It will not always be appropriate to monitor all functions and services provided by the Council, nor is it necessary. However there will be times when it is useful to monitor who is and who is not benefiting from the service provided. The type of data collected should be consistent throughout the Council.

2.4.2 It will be up to individual Directorates to decide what key areas may warrant monitoring. Some suggested examples of what to monitor include:

- Take up or non-take up of services
- Litigation against the organisation
- Customer complaints
- Customer satisfaction
- Impact or outcomes of services
- Whether information about services reaches different groups and is understood by them
- Employment statistics: recruitment, promotion, disciplinaries, grievances, training, and employment tribunal cases

## **2.5 When to monitor?**

2.5.1 Monitoring should be part of an existing process, for example, an application form for recruitment, or as part of an assessment process for access to services. The exact frequency of monitoring can vary according to function or service and may be:

- A one off time limited snapshot exercise
- An ongoing and continuous process with regular review
- Periodically (monthly, quarterly, annually, occasionally, etc.)

2.5.2 It is imperative that equality monitoring information is only gathered if it is going to be analysed and used to inform service design or delivery and/or policy development.

## **2.6 What type of questions to ask?**

2.6.1 The implementation of equality monitoring requires careful preparation. It may have the basis in policy and be linked to a detailed implementation plan. Alternatively, it may be identified as an area for improvement arising out of a customer access review (equality impact assessment) or service review. In implementing equality monitoring, the following key issues need to be addressed on a service by service basis:

- Whether or not to monitor
- If monitoring is to take place then why
- The subject to be monitored
- The policy context
- Who is to collect the information, when, how and from whom
- How the data is to be stored
- How the data is to be analysed, manually or by computer
- Who is responsible for reporting the findings of the equality monitoring
- What format the reports should take
- The purpose of the reports
- How the data will be used to improve services or performance
- Confidentiality and data protection requirements

2.6.2 The Council has a Corporate Equality Monitoring Form, which can be found in [Appendix B](#). This standard form can be used in order to collect equality data. If staff would like more information on how to use this form, this is explained further in the Council's Consultation and Engagement Toolkit.

2.6.3 It is important to note that the usefulness of the monitoring information gathered would still be dependent on being able to get a sufficient number of replies for the results to be meaningful. If a sufficient sample of responses is not possible, other means of consultation (other than a questionnaire) may be more appropriate for gathering the information required, such as focus groups or interviews. The

Council's Consultation and Engagement Toolkit provides more information on the types of consultation and engagement methods available.

2.6.4 In most cases it is not desirable for the length and number of monitoring questions to be greater than the main body of the survey questionnaire. There will be exceptions to this rule if, for example, the questions being asked are crucial to service planning or policy development. An example of this might be where options are being presented to individuals on budget or service priorities.

2.6.5 The questions to ask will be determined by the purpose of the consultation and what the results will be used to inform.

2.6.6 Consideration must be given to:

- Why is the information being asked for and how will the results be used
- How concerns about confidentiality can be addressed
- How to explain the purpose and importance of monitoring to employees and service users
- How to deal with potential prejudice and concerns arising from monitoring the additional equality strands (communication and education are key)
- How reliable will the results be
- How will the Council benchmark the data collected against the data that is available locally or nationally

### 2.6.7 **Questions to monitor protected characteristics**

Equality monitoring covering age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation is the recommended requirement for equality monitoring. The Equality and Human Rights Commission do recognise that information other than age, disability, race and sex, can be more sensitive or difficult to obtain, particularly when a culture of collecting this information has not been established. The Commission recommends that there may be other ways of identifying the issues faced through analysing national or local research and engagement with people from those groups.<sup>2</sup>

## 2.7 **Practical issues**

2.7.1 The following practical issues must be considered when carrying out equality monitoring:

- Do forms need to be redesigned to encourage applicants to answer the equality monitoring questions?
- Is a separate sheet necessary for the equality question?
- How should the question be worded?
- Where application for/provision of a service involves an application form, where should the equality monitoring question be located on the form?

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<sup>2</sup> (2011) Equality and Human Rights Commission. The essential guide to the public sector equality duty pg.19

- 2.7.2 Where the equality monitoring questions are asked verbally, the relevant part of the form or a separate list should be shown to the service user/customer, where possible, so they can make their own choice. This avoids the dangers associated with 'second guessing' e.g. ethnicity.
- 2.7.3 If your response rates to questionnaires and surveys are routinely low, take steps to try and improve them. One way of doing this is to make sure that people are clear about why you are collecting the information. If you are able to demonstrate to your staff and service users that you use this information to improve your performance then they will be more likely to respond.

## **2.8 Acting on the results of equality monitoring**

- 2.8.1 It is important that the data collected is regularly interrogated, and then followed up, any issues identified and tackled. Monitoring is part of analysis, reporting, asking questions, investigation and change.
- 2.8.2 The most important aspect of equality monitoring is to compare the results with the targets set and any baseline data. There are a number of sources for collecting baseline data, such as the Census data, published statistics collected by statutory agencies or departments etc. However, caution needs to be exercised when comparing data as accurate baseline data is not always available. In such cases, it may be advisable to carry out a preliminary mapping to identify communities of interest.
- 2.8.3 A distinction needs to be made between quantitative and qualitative data. The Council will need to assess what the data will tell it about the experiences of individuals as against the characteristics of the population at large.
- 2.8.4 When analysing data, remember that individuals may experience multiple discrimination, (including from within their own communities) where they are "minorities within minorities". For example, disabled people who remain invisible and marginalised can include those who are parents, young, older, asylum seekers or from Black and Minority Ethnic (BME) or faith communities.
- 2.8.5 Any data collected can be used for:
- Setting Specific, Measureable, Attainable, Relevant and Timely (SMART) targets
  - Evaluating service delivery by comparing performance data over time
  - Redesigning or augmenting services
  - Developing positive action programmes
  - Targeting action to reduce identified inequalities

## **2.9 Presenting the data**

- 2.9.1 In presenting data, it is good practice to:
- Concentrate on key indicators
  - Highlight key findings

- Present a mix of statistics, tables and graphics
- Provide relevant explanations
- Include clear recommendations for action
- Produce equality reports on a regular basis together with other management information
- Consider the audience and ensure that the information presented is accessible

2.9.2 One method of providing an overview of equality monitoring is through annual Directorate reports, which should cover the following areas:

- Which services or policies have been monitored in the reporting period and the methods used
- An overview of the main findings following data analysis
- Actions that have been taken or are planned as a result
- Outcomes and positive benefits for communities that changes made have produced
- Future plans for monitoring

## **2.10 Procurement Equality Standard**

2.10.1 The [Procurement Equality Standard](#) seeks to ensure that the Council meets the three objectives of the Equality Act 2010 general duty (see section 1.5) within its procurement arrangements.

## **2.11 Data Protection**

2.11.1 Equalities monitoring can involve asking for and recording personal data about individuals. The Data Protection Act 2018 (DPA) protects individuals against the misuse of that data, and all records whether manual or computerised will need to meet the requirements of the DPA.

2.11.2 Data that is gathered for the purpose of equalities monitoring will often fall within the special categories of data under the General Data Protection Regulation (GDPR), i.e. where it relates to 'racial or ethnic origin, religious or philosophical beliefs, health or sexual orientation'. The Data Protection Act 2018, which supplements the provisions of the GDPR, explicitly provides that equalities monitoring is a lawful reason to justify the holding and processing of such special category data.

The Council has a Data Protection Policy setting out the safeguards it has implemented for processing special category data.

2.11.3 The Data Protection Officer's advice is that equality monitoring forms should be designed for anonymous completion and should be capable of being detached from application forms, complaints forms etc. Equality monitoring information should not be available to Officers involved in decision making on the provision of services, complaints or recruitment selection. At no time should the Council be placed in a position that could be considered or perceived as discriminatory.

2.11.4 Depending on the nature of an equality monitoring exercise, personal data should be anonymised and provided that there is no way of identifying an individual to whom the data relates, the GDPR will not apply. Total anonymisation when gathering equality data may not always be possible for a monitoring programme where it is necessary to track individuals, for example ongoing monitoring of data on resignations with reference to race.

2.11.5 The Council's Corporate and service specific Privacy Notices explain how it processes personal information and individuals' additional rights. Service users, complainants and prospective employees should always be signposted to the Corporate and relevant service specific Privacy Notices (as applicable) which can be viewed at [Dartford Borough Council's website](#).

## **3.0 TRANSLATION AND ALTERNATIVE FORMAT POLICY**

### **3.1 Introduction**

- 3.1.1 Dartford Borough Council is keen to ensure that customers can receive and understand any information provided to them.
- 3.1.2 This policy outlines how employees can provide customers with information that requires translation or provision in an alternative format.
- 3.1.3 When processing a request, it is important to try and clarify the particular needs of the individual concerned, to ensure that they are accessing the correct information.

### **3.2 Interpreting**

#### **3.2.1 Telephone interpreting**

Telephone interpreting connects the customer to an interpreter over the telephone. This is recommended when you require interpretation immediately or at short notice and for relatively straight forward conversations.

Once you provide the operator with the language required, the call is connected to an interpreter. Explain the situation and pass the telephone to the person who requires the translation or ask to begin a three way call.

#### **3.2.2 Face-to-face interpreting**

Face-to-face interpreting is where an interpreter attends in person to directly translate a conversation. This is recommended for more complex conversations and requires booking in advance.

#### **3.2.3 British Sign Language interpreting**

British Sign Language (BSL) is a visual means of communicating using gestures, facial expression, and body language. BSL is used mainly by people who are Deaf or have hearing impairments.

### **3.3 Translation of published material**

- 3.3.1 The Council provides six translation options for published material, which are currently Punjabi, Tamil, Polish, Czech, Mandarin and French. These will be reviewed annually to ensure that they are still the most commonly required. However, translation of published material will be provided for any language requested in addition to the languages listed above.
- 3.3.2 Council publications that will be viewed by customers (leaflets, newsletters, surveys, service information etc) must carry the straplines (see below). The straplines must be included within the main body of the text and should not be separated out at the end of a document.

<b>ਪੰਜਾਬੀ</b>	<b>தமிழ்</b>	<b>Polski</b>	<b>česky</b>	<b>简体中文</b>	<b>Français</b>
Punjabi	Tamil	Polish	Czech	Mandarin	French
01322 343610	01322 343611	01322 343612	01322 343613	01322 343614	01322 343615

- 3.3.3 Each strapline provides a telephone number for the customer who requires the translation to call, with the facility to leave a message. Customer Services will regularly check the answerphone messages and contact Medway's Community Interpreting Service when a translation is required.
- 3.3.4 The cost of each translated answerphone message will be allocated to the department that the customer is attempting to communicate with.

### **3.4 Other formats**

- 3.4.1 Council publications that will be viewed by customers (leaflets, newsletters, surveys, service information etc) should also carry the following strapline explaining that alternative formats such as Braille, large print and audio tape can be provided.

**If you or anybody you know requires this or any other council information in another language please contact us and we will do our best to provide this for you. Braille, Audio tape and large print versions of this document are available upon request.**

**Tel: 01322 343434**

**Calls are welcome via NGT Relay**

### **3.5 Use of colours**

- 3.5.1 Avoid having text in green, red or pink as people who are colour blind may find these difficult to read. The best colour to use is black text against a white background.

### **3.6 Dealing with requests**

- 3.6.1 The Council uses an external provider for interpreting, translation and alternative format services. Any requests by a customer to a department for these services should be forwarded to Customer Services, who will book the request with the service provider (aside from Housing Services who will book their own requests for their customers).
- 3.6.2 Any requests to a department for these services are to be paid for by the department that the customer is attempting to communicate with. Customer Services can advise on the charges for each request.
- 3.6.3 Service Managers should allow for the possibility of such requests and take this into account when planning budgets.
- 3.6.4 If you need further advice, please contact Customer Services or Policy & Corporate Support.

## 4.0 CUSTOMER ACCESS REVIEWS

### 4.1 Aim of customer access reviews

- 4.1.1 A customer access review (also known as an equality impact assessment) is a tool used for assessing the Council's work instructions, projects, policies, strategies and services to determine their impact on people. A customer access review aims to identify areas where equality of opportunity is advanced, but also where discrimination may exist. Any improvements that will mitigate or remove any identified negative equality impacts are then incorporated into an action plan, which is monitored by the Council.
- 4.1.2 Customer access reviews ensure that the Council publishes sufficient information to demonstrate its compliance with the general duty across its functions (see section 1.5).
- 4.1.3 Customer access reviews should be carried out before particular decisions are made and at the time of making decisions. Assessing impact on equality should also not be a one-off exercise. This is because the public sector equality duty is a continuing duty and policy contexts and other circumstances will change over time.
- 4.1.4 The service area responsible for the work instruction, project, policy, strategy or service, is responsible for carrying out the customer access review. The review is carried out in two stages:
- **Stage 1: Initial assessment:** this formally considers if a full customer access review is required. The assessment looks at the relevance to equality in so far as whether the activity or proposal will either affect people with protected characteristics, that it is relevant to any of the aims of the public sector equality duty, or both.
  - **Stage 2: Full assessment:** this is an in-depth assessment of the impact on equality. This considers the information there is on affected groups, including how they have been consulted and whether there are any gaps in information; the likely equality impact in relation to the protected characteristics against each relevant aim of the general equality duty; and, actions to mitigate or remove any negative equality impacts identified.
- 4.1.5 Customer access reviews are published on the Council's [customer access review page on the website](#) or are available in alternative formats on request.
- 4.1.6 The forms needed in order to complete a customer access review, can be found in [Appendix C](#).

## **5.0 DIVERSITY INFORMATION**

5.1 The detailed equality and diversity profile of Dartford can be found on [Kent County Council's website](#). Below is a summary of the main information about the population of Dartford.

### **5.2 Population**

5.2.1 Dartford's population is 109,700. Dartford is Kent's most densely populated local authority district with 15.1 people per hectare. Dartford has seen the largest population increase both in absolute and percentage terms, increasing by an additional 2,200 people (+2.04%) between 2017 and 2018 (Source: 2018 Mid Year Populations Estimate, ONS).

### **5.3 Age**

5.3.1 The mean age in Dartford is 37.7 years, which is slightly lower than the overall Kent mean age of 41.4 years. (Source: 2018 Mid Year Populations Estimate, ONS).

### **5.4 Gender**

5.4.1 There are slightly more female residents than male residents in Dartford where 50.7% people are female and 49.3% people are male. The male/female ratio changes with age. Generally, there are more males compared to females in the younger age groups. As age increases there becomes more females to males. (Source: 2018 Mid Year Populations Estimate, ONS).

### **5.5 Disability**

5.5.1 15.1% of Dartford residents consider themselves to have a long-term health problem or disability which limits their day-to-day activities. This is lower than the Kent average of 17.6% (Source: 2011 Census, ONS). DWP data shows that 6.5% of Dartford residents were claiming a disability benefit as at November 2018, which equates to 6,974 claimants.

### **5.6 Ethnicity**

5.6.1 The largest ethnic group in Dartford is White (87.4%) whilst the remaining 12.6% of Dartford's residents are from a Black Minority Ethnic (BME) group made up of four broad groups (Asian/Asian British; Black/African/Caribbean/Black British; Mixed/Multiple Ethnic Group and Other Ethnic Group). The Asian/Asian British group is the largest BME group in Dartford (6.0%). Dartford has the highest BME population in Kent after Gravesham (Source: 2011 Census, ONS).

### **5.7 Religion or belief**

5.7.1 Almost three quarters of Dartford residents follow a religion. Christianity is the largest religion (60.64%) followed by the Muslim religion (1.61%). 27.20% of residents have no religion and 6.56% did not state a religion (Source: 2011 Census, ONS).

## 5.8 Marriage and civil partnership

5.8.1 47.1% of Dartford's residents over 16 years old are married. This is lower than the Kent average of 48.8%. 0.2% of Dartford's residents are in a registered same-sex civil partnership (Source: 2011 Census, ONS).

## 5.9 Sexual orientation

5.9.1 The "count" of people in registered same-sex civil partnerships, as covered in 5.8, is about marital status and not sexual identity, therefore it does not count all people who identify themselves as lesbian, gay or bisexual. Currently there is no single source of data that provides a measure of sexual orientation.

## 5.10 Gender reassignment

5.10.1 At present, there is no single source of data that provides a measure of the number of people who are going through or have gone through gender reassignment.

## 5.11 Pregnancy and maternity

5.11.1 In 2018, there were a total of 1,668 births in Dartford. This is 15.2 births per 1,000 population of all ages, which is higher than the Kent figure of 10.9. (source: Vital Statistics, ONS).

## 5.2 Dartford Borough Council employees

- 62.8% of employees are women and 37.2% are male
- 10.10% of employees are from a BME community
- 14.80% of employees have a disability
- 9.39% of employees are aged under 25
- 29.97% of employees are aged between 26 and 45
- 57.04% of employees are aged between 46 and 64
- 3.61% of employees are aged over 65

### Dartford Borough Council employees by age

Band	Number	Percentage
<25	26	9.39%
26-30	7	2.53%
31-35	16	5.78%
36-40	23	8.30%
41-45	37	13.36%
46-50	41	14.80%
51-55	45	16.25%
56-60	44	15.88%
61-64	28	10.11%
>65	10	3.61%
Total	277	100%

## 6.0 APPENDICES

### APPENDIX A – Equality Objectives

**Objective 1: Our services are accessible to everyone and do not discriminate on any unjustifiable ground**

<b>ACTION</b>	<b>REASON FOR ACTION</b>	<b>TARGET DATE</b>	<b>LEAD OFFICER</b>
Provide customers with access to a translation and alternative format service	Equality of opportunity is advanced when accessing Council information and services	Ongoing	Policy & Projects Officer
Include the translation and alternative format strapline on all publications relating to information and services provided by the Council, and review the translation options in this strapline annually	All customers can benefit from Council information and services	Ongoing	Designer / Policy & Projects Officer
Monitor the use of translation and alternative format services	A better understanding is obtained of the communication needs of customers	Annually	Policy & Projects Officer
A continuous programme of Customer Access Reviews of all services is undertaken, including for new policy or service delivery proposals	Identifies areas where equality of opportunity is advanced, but also where discrimination may exist and how negative impacts can be addressed	Ongoing	Policy & Projects Officer
The results of Customer Access Reviews are fed into relevant Service Plans	Ensures that equality issues identified in Customer Access Reviews are dealt with by the relevant service	Ongoing	Service Managers
Where appropriate carry out equality monitoring of our customer's protected characteristics and how they are affected by the Council's policies and the services it provides	Helps to inform the design and delivery of services by providing an understanding of our customers and possible inequalities they encounter	Ongoing	Service Managers

**Objective 2: Our services seek to meet the needs of our customers and local communities can influence our services**

<b>ACTION</b>	<b>REASON FOR ACTION</b>	<b>TARGET DATE</b>	<b>LEAD OFFICER</b>
Involve the Elders Forum and the Youth Council in the development of Council services	The Council receives a wide range of feedback on its services and proposals for service developments	Ongoing	Projects & Events Officer
Continue to develop the Council's information base in terms of the socio economic profile of the Borough and publish this information annually in the Equality & Diversity Document Framework	The Council has a robust knowledge of the socio economic breakdown of the Borough which can be used to underpin service and policy development	Annually	Policy & Projects Officer
A central database of local community groups is reviewed annually for officers to access when planning consultation activity	The Council receives a wide range of feedback on its services and proposals for service and policy developments	Annually	Policy & Projects Officer
Clearly publish and promote our comments, compliments and complaints process and positively encourage our customers to use the system	Customers have awareness and a means of raising equality issues through this process	Ongoing	Corporate Complaints Officer

**Objective 3: Equality and diversity is championed within the Council and our workforce, at all levels, is representative of the local community**

<b>ACTION</b>	<b>REASON FOR ACTION</b>	<b>TARGET DATE</b>	<b>LEAD OFFICER</b>
Carry out an annual workforce analysis	The Council has up to date information on its workforce profile	Annually	HR Manager
Publish the HR policies that have been subject to a Customer Access Review	Council HR policies are not discriminatory	April 2018	HR Manager
Publish gender pay gap information on the website	Shows if there is a difference in the average pay between all men and women in the Council's workforce and identifies if action needs to be taken to reduce or eradicate this	Annually from 30 March 2018	HR Manager
All staff complete Diversity, Equality and Discrimination awareness training as part of their induction process	Staff understand the concept of equality and diversity, the protected characteristic groups, different forms of prohibited conduct and discrimination, and the duties under the Equality Act 2010	Ongoing	HR Manager
Training on the Equality Act 2010 and the Council's approach to equalities is provided to Members	Members are aware of their responsibilities under the Equality Act 2010	June 2018	Member Services Manager
All Committee reports demonstrate that the equalities duties have been considered	Members and Managers are informed about the equality impacts of the decisions they are being asked to make	Ongoing	Service Managers
Report annually on overall performance of the Council including progress with the Equality Action Plan and Customer Access Reviews	Ensures that senior management of the Council are aware of the equality issues in the Council	Annually	Policy & Corporate Support Manager

## APPENDIX B – Corporate Equality Monitoring Form

### Monitoring our Comprehensive Equality Policy

We want to find out if we are giving as good a service as we can to all service users. To help us do this, please fill in this section. The information we get from all replies will help us review and decide how we can assist as many people as possible. This information will not be sent to any service department and will not affect the way you receive services from us. If you would rather not answer some or all of these questions, you do not have to.

#### Data Protection Statement

Your personal information may be converted ("anonymised") into statistical or aggregated data in such a way that ensures that you cannot be identified from it. Aggregated data cannot, by definition, be linked back to you as an individual and may be used to conduct research and analysis, including the preparation of statistics for use in our reports.

Please refer to our Corporate Privacy Notice at [www.dartford.gov.uk](http://www.dartford.gov.uk) for further details of how we process your personal information and for details on your additional rights.

#### 1. What is your ethnic group?

Choose one section from A to E, then tick one box to best describe your ethnic group or background. *Note: Ethnic groups are not about nationality, place of birth or citizenship. They are about culture and cultural background.*

##### A: White

- English/Welsh/Scottish/Northern Irish/British
- Irish
- Gypsy or Irish Traveller
- Any other white background, write in .....

##### B: Mixed/multiple ethnic groups

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other mixed background, write in .....

##### C: Asian/Asian British

- Indian
- Pakistani
- Bangladeshi
- Chinese
- Any other Asian background, write in .....

##### D: Black/African/Caribbean/Black British

- African
- Caribbean
- Any other Black/African/Caribbean background, write in .....

##### E: Other ethnic group

- Arab
- Any other ethnic group, write in .....
- Prefer not to say

#### 2. What is your age?

- |                                   |  |
|-----------------------------------|--|
| <input type="checkbox"/> Under 16 | <input type="checkbox"/> 60-64             |
| <input type="checkbox"/> 16-24    | <input type="checkbox"/> 65-74             |
| <input type="checkbox"/> 25-34    | <input type="checkbox"/> 75-84             |
| <input type="checkbox"/> 35-49    | <input type="checkbox"/> 85 and above      |
| <input type="checkbox"/> 50-59    | <input type="checkbox"/> Prefer not to say |

#### 3. Do you consider yourself to be disabled?

- Yes
- No
- Prefer not to say

If yes, please tick the box(es) that best describes your disability

- |  |  |
|--|--|
| <input type="checkbox"/> Mental health       | <input type="checkbox"/> Physical disability   |
| <input type="checkbox"/> Learning disability | <input type="checkbox"/> Other, write in ..... |
| <input type="checkbox"/> Sight impairment    | <input type="checkbox"/> Prefer not to say     |
| <input type="checkbox"/> Hearing impairment  |  |

#### 4. What is your gender?

- Male
- Female
- Prefer not to say

Is your gender identity the same as the gender you were assigned at birth?

- Yes
- No
- Prefer not to say

#### 5. What is your religion or belief?

- |                                    |  |
|------------------------------------|--|
| <input type="checkbox"/> None      | <input type="checkbox"/> Muslim                |
| <input type="checkbox"/> Christian | <input type="checkbox"/> Sikh                  |
| <input type="checkbox"/> Buddhist  | <input type="checkbox"/> Other, write in ..... |
| <input type="checkbox"/> Hindu     | <input type="checkbox"/> Prefer not to say     |
| <input type="checkbox"/> Jewish    |  |

#### 6. What is your sexual orientation?

- |  |  |
|--|--|
| <input type="checkbox"/> Heterosexual/straight | <input type="checkbox"/> Other, write in ..... |
| <input type="checkbox"/> Gay woman/lesbian     | <input type="checkbox"/> Prefer not to say     |
| <input type="checkbox"/> Gay man               |  |
| <input type="checkbox"/> Bisexual              |  |

## APPENDIX C – Customer Access Review Templates

### Initial Screening

SECTION 1: SCREENING DETAILS	
Assessment area	
Date of screening	
Directorate and Service	
Manager	
Officer conducting screening	

  

SECTION 2: CUSTOMER ACCES REVIEW SCREENING	
<b>1. What are the aims and objectives of the activity or proposal?</b>	
<b>2. Who will be affected by the activity or proposal?</b>	
<b>3. Is there any indication that different groups of people have or will have different needs, experiences, issues or priorities in relation to the activity or proposal?</b> (Consider this in relation to the protected characteristics of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)  <input type="checkbox"/> Yes <input type="checkbox"/> No  Please explain:	
<b>4. Please indicate which aims of the Public Sector Equality Duty the activity or proposal is relevant to:</b>  a) To eliminate unlawful discrimination and victimisation and other conduct prohibited by the Equality Act 2010?  <input type="checkbox"/> Yes <input type="checkbox"/> No  Please explain:  b) To advance equality of opportunity between those who share a protected characteristic and those who do not?  <input type="checkbox"/> Yes <input type="checkbox"/> No  Please explain:  c) To foster good relations between the people who share a protected characteristic and those who do not?  <input type="checkbox"/> Yes <input type="checkbox"/> No	

## SECTION 2: CUSTOMER ACCES REVIEW SCREENING

Please explain:

### 5. Please identify the degree to which the activity or proposal has been assessed as relevant to equality

- High** – The activity or proposal shows a high degree of relevance to one or more protected characteristic and / or one or more aim of the Public Sector Equality Duty
- Medium** – The activity or proposal shows a moderate degree of relevance to one or more protected characteristic and / or one or more aim of the Public Sector Equality Duty
- Low** – The activity or proposal is not relevant to any protected characteristic and / or any aim of the Public Sector Equality Duty

If the Section 2 has identified a **high** or **medium** ranking, a full **Customer Access Review** is required. If a **low** ranking has been identified, a full **Customer Access Review** is not required.

## SECTION 2: SCREENING OUTCOME

### 6. As a result of this Section 2 of this Initial Screening, is a full Customer Access Review required?

- Yes** (Send this Initial Screening to the Policy & Projects Officer AND complete a full Customer Access Review using the Customer Access Review Assessment Template)
- No** (Send this Initial Screening to the Policy & Projects Officer)

## Full Customer Access Review

<b>Assessment details</b>	
<b>Assessment area</b>	
<b>Date of assessment</b>	
<b>Directorate and Service</b>	
<b>Manager</b>	
<b>Officer conducting assessment</b>	
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	
<b>2. Who will be affected?</b>	
<b>3. How does the activity or proposal contribute to:</b> a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	
<b>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</b>	
<b>Step 2: Information collection</b>	
<b>5. What do you know about the groups of people who will be affected?</b> (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)	
<b>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b>	
<b>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</b>	

<b>Step 3: Assessing the equality impact</b>	
<p><b>8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:</b></p> <p><b>a) tackling unlawful discrimination</b>  <b>b) promoting equality of opportunity</b>  <b>c) promoting good relations</b></p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> <li>• The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration</li> <li>• For existing activities, consider how they are working in practice for each relevant protected group</li> <li>• For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group</li> <li>• If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9</li> <li>• If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9</li> </ul>	

<b>Step 3: Assessing the equality impact</b>				
<b>PROTECTED CHARACTERISTIC</b>	<b>POSITIVE IMPACTS</b>	<b>NEGATIVE IMPACTS</b>	<b>NO IMPACT</b>	<b>UNKNOWN</b>
<b>Age</b>			<input type="checkbox"/>	<input type="checkbox"/>
<b>Disability</b>			<input type="checkbox"/>	<input type="checkbox"/>
<b>Sex</b>			<input type="checkbox"/>	<input type="checkbox"/>
<b>Gender reassignment</b>			<input type="checkbox"/>	<input type="checkbox"/>
<b>Race</b>			<input type="checkbox"/>	<input type="checkbox"/>
<b>Religion/Belief</b>			<input type="checkbox"/>	<input type="checkbox"/>
<b>Sexual Orientation</b>			<input type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy/Maternity</b>			<input type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership*</b>			<input type="checkbox"/>	<input type="checkbox"/>

\* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

<b>Step 3: Assessing the equality impact</b>	
<b>9. If 'no impact' or 'unknown' was selected, please explain</b>	
<b>10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups</b>	
<b>11. Any other comments</b>	

<b>Step 4: Action plan</b>	
<b>12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:</b> a) any gaps in information and consultation b) how any negative impacts on equality will be mitigated or eradicated	

**a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?**

<b>Information needs</b>	<b>Action</b>	<b>Intended outcome</b>	<b>Date for completion</b>	<b>How this will be monitored</b>	<b>Responsible officer</b>

**b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?**

<b>Identified impacts (and who is affected)</b>	<b>Action</b>	<b>Intended outcome</b>	<b>Date for completion</b>	<b>How this will be monitored</b>	<b>Responsible officer</b>

<b>Step 5: Decision making and future monitoring</b>	
<b>13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?</b>	
<b>14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>15. How will you continue to monitor the activity or proposal on the equality groups?</b>	
<b>16. When will you review this Customer Access Review?</b>	

<b>Step 6: Final steps</b>	
<b>17. Once this Customer Access Review has been approved, send this assessment to the Policy &amp; Projects Officer</b>	
<b>18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded</b>	