

Internal consultation feedback received in relation to Equality, Diversity and Inclusion Policy  
issued for consultation between December 2018 to January 2019

ID no	Section	Feedback	Response to feedback
		<ul style="list-style-type: none"> <li>• Sent to EDI Group and Leadership Group for feedback 05.12.18</li> <li>• Presented to joint consultation forum 28.11.18 and taken back 17.01.19</li> <li>• Published on iDrive for wider feedback 10.12.18 to 09.01.19</li> <li>• Presented to BTB 24.01.19</li> <li>• Presented to Strategic Management Board 12 February 2019</li> <li>• Presented to Overview and Audit 13 March 2019</li> </ul>	
1.		<p>The only comment I have is that the document makes no mention of the EDI Advisory Group that was initially established in March 2017 and who's 'Core Function', as detailed in its TORs, includes 'working with all colleagues to develop a working environment where individual diversity is valued' and 'creating an inclusive workplace free from discrimination'.</p> <p>As such, I feel the EDI Advisory Group needs to be referenced within the policy, either at Paragraph 3 ('Roles and Responsibilities') or Paragraph 5 ('How the Authority will demonstrate its commitment')</p>	<p>S.5. - an additional bullet has been added 'Establish structured groups to include managers, employees, trade union and staff representatives throughout the Service, which will support and promote inclusion and engagement'</p>
2.		<p>This policy is ok for me. However, I have a question that links section 5 and section 7.</p> <p>We are in a position where we, all the way through the document, talk about our commitment and what we corporately will do and how we will report etc., but it does not address what staff should be doing to helping us achieve this. Specifically, it misses what should be a simple piece of work for everyone to do on iTrent, that we need people to put their gender, religion or ethnicity into the system so that we can actually report accurately and truly enable us to build plans to achieve equality of understanding so that we can demonstrate clearly what we do and how we do it against the policy.</p> <p>We know this is a knowledge gap in iTrent, so how can we achieve this aspect and get accurate reporting and build plans to overcome diversity barriers, because at the moment some of our work is guesswork?</p>	<p>S.7. - on monitoring has been amended, from 'Diversity information ... identification of any barriers' has been removed and replaced with;</p> <p>'Whist submitting sensitive personal information is optional, it is encouraged, as this data is an important component to identifying inequality, initiating activity and evaluating progress as required to meet legislation under the Equality Act (2010).'</p>

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<p><b>3.</b></p>	<p><b>S.1</b> <b>S.4</b></p>	<p>1 - 'By embracing diversity, the ....' Should these read something along the lines of '..acknowledges the full breadth of people we serve and seek to reflect that variety within the workforce'</p> <p>4 - (bullet points) 'Built' to 'build' &amp; 'Exceed the minimum legal requirements' - It is not clear what this means</p> <p>Following considerations also made:</p> <ul style="list-style-type: none"> <li>• Would it aid understanding if we were to include details of 'protected characteristics' - I think we are assuming that those bound to this policy understand what these are and this won't always be the case.</li> <li>• Within Paragraph 3.0 (Roles and Responsibilities) we state 'Members of the Authority will review and approve publication of its corporate, equality, diversity and inclusion objectives and monitor progress against these objectives on an annual basis.' - In line with this, there may be benefit in stating how we will demonstrate a clear link between meeting our equality objectives and achieving positive outcomes for our communities (as per the Fire &amp; Rescue Service Equalities Framework - FRS' will need to demonstrate a clear link between meeting our equality objectives and positive outcomes for its communities).</li> </ul>	<p>S.1. - sentence amended to say 'By embracing diversity ... within the community and seeks to reflect that variety within its workforce.'</p> <p>S.4. - bullet points - Grammatical amendment made and further wording added to legal requirements</p> <p>S.4. - Wording added on protected characteristics</p> <p>Stating how we demonstrate a clear link - noted</p>
<p><b>4.</b></p>	<p><b>S.1</b></p>	<p>If we want people to engage with EDI we need documentation to be attractive and appealing. I am asking myself whether the policy itself discriminates against people with learning disabilities e.g. dyslexia, dyspraxia, people whose first language may not be English, people who are visually impaired etc.</p> <p>Would it be worth including a definition of the separate words - equality, diversity, inclusion? I think it can be confusing - and I am not sure whether the information below really clarifies what we mean.</p> <p>S.1. In 'By embracing diversity' section - 'the Authority acknowledges the full</p>	<p>S.1 - Sentence amended to say 'By embracing diversity .. within the community and seeks to reflect that variety within its workforce.'</p> <p>S.1 - Alternate approaches - noted</p> <p>S.1. - 'instances of ...' - noted</p> <p>S.4. - Different backgrounds replaced with 'everyone'</p>

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	<p>breadth of people who work for the Service and seeks to reflect that variety within its workforce' - I'm not sure this sentence makes sense, do you mean the Authority acknowledges the full breadth of people in the community and seeks to reflect that variety within its workforce?</p> <p><b>S.3</b> S.1. Alternative approaches – to what?</p> <p><b>S.4</b> S.1. Last bullet point, sub bullet 'instances of' to discrimination, any perceived problems and potential discrimination</p> <p>S.4. I wonder about the wording of "different backgrounds" in the previous sentence, I do not think it describes what we mean. Two people could have the same background, lived next door to each other, similar financial status, employment etc. but one may have a disability and one may not. Not sure whether I am making sense, happy to try to clarify verbally.</p> <p>S.4. Third bullet point – retention is already mentioned in the point above, if this point remains, consider moving up to sit under the first bullet point</p> <p><b>S.5</b> S.5. In the bullet points. Point 5 - Less able – not sure about the wording Point 7 – is this a duplication of point 4 Point 9 – duplication again</p> <p><b>S.6</b> S.6. Second paragraph – 'The Director of People and Organisational Development has delegated responsibility from the Authority for overseeing the implementation, consistent application of, and continuing effectiveness of this policy.' I think the previous sentence needs to be reworded to make a little more sense.</p> <p><b>S.7</b> S.7. Earlier in the policy there is mention of respecting privacy. There may always be under-representation or perceived under-representation of certain</p>	<p>S.4. - Third bullet point removed S.5. - 'less able' removed and 'where appropriate' added Duplications of points 7 noted (this has been removed in S.4) Duplication of point 9 noted</p> <p>S.6. - Noted, not amended</p> <p>S.7. - Amended to state that submitting diversity data is optional</p>
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		groups due to people maintaining their privacy. This will be reflected across staff in the Service and service users. Whilst we may try to collect 'diversity' information from service users, our ability to do so effectively will always impact on data. Should this be acknowledged as it could affect performance data?	
<b>5.</b>		The policy looks sound to me. Just wondering whether we want to make reference to the existing diversity pledge we have signed-up too as an example of our commitment to this policy?	Noted
<b>6.</b>	<b>S.6</b> <b>S.7</b>	<p>S.6. Delegated responsibility – I do not think this is completely accurate – probably should lose delegated from the Authority.</p> <p>S.7. Monitoring – this does not explain the collection of data. I think this policy could easily include a privacy statement, as it is a key facet of respect and equality to respect an individual's privacy.</p> <p>I am looking to separate the integrated impact assessment as the requirements of the Data Protection Impact Assessment are more onerous than previously (It may be possible to reintegrate at a future point). There does not appear to be mention of the process in the document.</p> <p>Monitoring – it is unclear how this data will be collected and anonymised. There is nothing specific to EDI in the retention schedule and the details of access to different areas of iTRENT. Although positioned as a policy it feels like a hybrid – cross between a policy and procedure</p> <p>It does not have an Integrated Impact Assessment</p>	<p>S.6 – noted</p> <p>S.7 - amended to state collection of data is optional and reference is made to information being held in strictest confidence and only used for anonymised monitoring and reporting purposes</p> <p>Delegated authority – noted</p> <p>Privacy statement – noted</p>
<b>7.</b>	<b>S.1</b>	S.1. (in second paragraph) 'aspirational for all employees' this should include everyone, i.e. also FA members	This paragraph has been amended