


# LGA Bespoke Equality Peer Support

City of Bradford Metropolitan District  
Council

15<sup>th</sup> – 16<sup>th</sup> November 2022

Feedback report





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# 1. Executive summary

This peer challenge is a follow-up to the bespoke Equality Peer Challenge held in November 2021. City of Bradford Metropolitan District Council (CBMDC) asked the LGA to examine areas that it felt were most important, and this repeat visit has followed the same structure. The Interim Feedback Paper (2021) is included in this report as an appendix. From this interim feedback, CBMDC developed a live action plan which is continuously updated.

There is considerable leadership on Equality, Diversity and Inclusion (EDI) from the Leader and the Chief Executive. The team only spoke to a small number of councillors from a council membership of 90 and saw no records of Member training. It is not possible therefore to give a judgement on Councillors' knowledge and experience about EDI. Those councillors that the team did speak to in 2022 had considerably improved their understanding since the 2021 peer challenge.

Community representatives, staff and councillors all recognise that there has been significant progress since last year. The discussions held in 2022 were more developed and there was a considerable increase in understanding about the broad equality agenda. Challenging conversations, with councillors as well as staff, are happening a lot more at all levels of the organisations. This includes challenging inappropriate behaviour by Members and staff.

Staff networks have developed considerably. Largely staff-led, they are developing in different ways, at the needs of their members. Clear parameters will help to minimise raising expectations about what is possible and what isn't.

There are still some workforce issues: management of reasonable adjustments for disabled staff is inconsistent, and in some cases, worsened, due to assumptions being made about new technology and software. There have been some improvements to the informal reporting process for grievances, with staff networks able to support individuals in a way that was not possible before. However, the formal grievance process is still very long, and cases remain high

There is significant ambition for improvements in the workforce, but HR lacks the capacity to take much of this work on. This includes improvements to the grievance casework and reasonable adjustments processes, as well as proactive measures to

support staff, and action taken about how representative the workforce is of local communities.

There is a lot of good work being done, aimed at behaviour change and improved understanding by those within the council and the wider public. However, it is important to be more specific in the outcomes you want to achieve from the work you are doing. Projects are designed to improve situations for different communities (for example, apprenticeships recruitment being targeted), but the council is not always explicit about what it is aiming for

## 2. Key recommendations

There are several observations and suggestions within the main section of the report. The following are the peer team's key recommendations to the council:

### **2.1. Consider holding a council-wide health-check to see how well Equality, Diversity and Inclusion is embedded.**

Bradford's own officers, as well as the peers, suggested this to demonstrate how well EDI is understood, embedded and achieving outcomes. This would offer the council an opportunity to highlight some of the work it has done in partnership with others and consider how service areas are maximising their impact on different communities. The last LGA Corporate Peer Challenge was in 2017; EDI could be part of the next CPC's focus.

### **2.2. CBMDC needs to be clearer about how it uses its rich data sources to identify and deliver outcomes**

CBMDC has worked hard with its partners to establish rich data sources. This is used to understand who different communities are, and where they are based in the city, but not always used to direct or influence service planning. This is also true of participation in development programmes, including Respect, Allyship training and apprenticeships.

### **2.3. Establish a public Member training record on the website in the interests of transparency and openness.**

This would demonstrate to the communities that councillors serve that they are actively involved in maintaining and developing their skills and knowledge and ensuring that they are up to date with all developments in Local Government. It would help to ensure that the public had widespread confidence in their elected members. This training record could then demonstrate how councillors are keeping up to date with changes in equality good practice and legislation. The team recommend that the ED&I (Equality, Diversity, and Inclusion) training received by members is the same as staff training where possible to maintain a consistent council-wide approach.

**2.4. Consider allyship and bystander training to ensure there is an inclusive approach when challenging all forms of discrimination so that people understand what an effective anti-racist, feminist and inclusive ally looks like.**

This could build on the work of the Respect Campaign and ensure that an increasing number of people understand what being an inclusive means in practice, and how that changes the culture of an organisation.

**2.5. Reduce the timescales for formal grievances.**

The Council has worked hard and made progress in reducing numbers of grievances. There has been increased support and coaching to managers about conducting the processes and improving informal methods of resolution. However, manager pressure is resulting in formal investigations taking a long time. The current aim is to close 75% of grievances within 140 days. The team recommend creating additional temporary resource to further reduce the time investigations take. It is also important to understand the equality impacts of the investigation period. Reducing the timescales was discussed when on site (three months was mentioned as an aim) and it would help to maintain and improve staff morale and workforce inclusion.

## 3. Summary of the peer challenge approach

### 3.1. The peer team

Peer challenges are delivered by experienced elected member and officer peers. The make-up of the peer team reflected the focus of the peer challenge and peers were selected because of their relevant expertise. The peers were:

- Member Peer – Muhammed Butt, Leader, LB Brent
- Officer Peer – Minakshee Patel, Rugby Borough Council
- Officer Peer – Arif Sain, LGA Associate
- LGA Peer Challenge Manager – Becca Singh

### 3.2. Scope and focus

The peer team considered the following themes

1. **Leadership, accountability and visibility**
2. **Workforce**
3. **Communities**
4. **Service design**
5. **Equality Objectives and Action Plan**

### 3.3. The peer challenge process

Peer challenges are improvement focused; it is important to stress that this was not an inspection. The process is not designed to provide an in-depth or technical assessment of plans and proposals. The peer team used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material that they read.

The peer team prepared by reviewing a range of documents and information to ensure they were familiar with the council and the challenges it is facing. The team then spent two days on site in Bradford, during which they:

- Gathered information and views from around 20 meetings, in addition to further research and reading.

- Spoke to around 40 people including a range of council staff together with members and external stakeholders.

This report provides a summary of the peer team's findings. In presenting feedback, they have done so as fellow local government officers and members.

## 4. Feedback

### 4.1. Leadership, accountability and visibility

The strategic links between Council plans, and district-wide partnership plans have been strengthened. Partners explained how they work with the council, and recent successful funding bids with partners demonstrate this commitment to action in partnership with other district wide organisations. In addition, working with the West Yorkshire Combined Authority (WYCA) and the West Yorkshire Mayor, has strengthened CBMDC's strategic position in the district.

Faith is important to a high proportion of the population of the district. CBMDC recognises this and respects this. However, it is still important to ensure that the EDI agenda becomes fully inclusive. This includes disabled people and people from LGBTQ+ communities. Although there have been improvements in the last 12 months, the team, and officers, felt that there is still an unofficial hierarchy of inequality and discrimination. Experience of historic discrimination must not be dismissed, but instead should embrace the broad inclusive agenda.

Mandatory Member training is currently limited to the quasi-judicial roles of Planning and Licencing. The peer team recommend that the council considers how other member development could be made mandatory, such as specific EDI sessions, or ensuring that all Members have regular updates on changes in local government, and that EDI is embedded in those updates. There has been a recent survey of Members on what training they would like; it is also important to consider what training or development may be needed. The team suggest that the council explore how to include EDI in Member Development, either as a separate compulsory session, or built into other mandatory training.

The reporting template to support Member decision-making now includes an EDI section that must be completed. Officers recognise that this could be superficial, and

steps are being taken to improve understanding of the issues so that this part of all reports is meaningful.

Senior Managers demonstrate a commitment to addressing inequalities and discrimination. Staff generally have confidence in them and could give examples of how things had improved in the last 12 months. As a result, staff feel more empowered to challenge a colleague or manager if they witness or experience inappropriate behaviour. They report an increase in confidence that senior managers will support them for speaking out.

The Respect campaign is a great example of a staff initiative that has led to widespread engagement with the EDI agenda. There are plans to deliver the Respect Allyship training to Members as well as officers soon. The team recommends that the training for Members is the same as that for officers to maintain the standard and consistency across the council, ensuring a 'one council' approach to EDI. It would be good practice to monitor and review who is getting involved with the programme and encourage staff from all service areas and all levels of the organisation to attend. Currently, although there are high levels of engagement, this information is not analysed in depth to understand whether it is one particular group of staff, for example, whether it's all office-based staff, or all disabled or BAME (Black, Asian and Minority Ethnic) staff.

It should be noted, however, that the peer team saw very few councillors, and therefore cannot comment on how well councillors understand widespread EDI issues or take them into account in decision-making processes.

#### **4.2. Workforce**

Over the last 12 months, the staff networks that were very new in 2021 have developed and been strengthened. The council now has seven networks: LGBTQ+, Disability, Race, BAME Women, Women, Younger people and Working Carers. They are providing support to particular groups of staff and are also helping the council identify areas where work still needs to be done.

The workforce dashboards now available on the intranet are an excellent reporting mechanism on appraisals and training attendance, as well as workforce demographic data. It was not clear, however, what work was being done to improve disclosure



rates, for example of being disabled or LGBTQ+.

Bradford's use of individuals' life experience in training videos for Respect e-learning and Respect Allyship training is good practice. It is important to remember that equality professionals often have a broader knowledge base than individuals, so BMDC (Bradford Metropolitan District Council) should make sure that there is a balance.

There are examples of successful and popular programmes that could help to diversify the workforce, such as targeted encouragement on the leadership programme, varied use of the apprenticeship levy, high numbers on the Kickstart programme and diverse participation in the National Graduate Development Programme. However, there has been no analysis on how those participants progress once the initial programme is over. For example, in 2021, the peer team congratulated CBMDC on the high (and diverse) numbers going through the Kickstart programme but highlighted the need to identify where they went on to after the programme was over. In 2022, this information was still not being collected or analysed by different demographics. The team urge CBMDC to collect progression data and analyse the data to be able to identify if the council is meeting its aim of developing the skills and aspirations of all communities in the district.

There are examples of going back to recruitment agencies to ask for a more diverse pool of candidates for senior posts, but no analysis on whether this has resulted in a more diverse workforce at different levels of the organisation. The peer team encourage CBMDC to identify what success would look like and take active steps to monitor progress.

Since 2021, there is increased manager understanding that processes (such as recruitment) need to be consistent, but this is not always applied in a manner that offers equality of opportunity. Examples were given where some managers treated all applicants the same, rather than supporting all shortlisted applicants to have the same level of opportunity of success. The processes for supporting neuro-diverse applicants exists but is not always appropriately applied.

The appraisal process is being used to identify and embed the council's equality goals. Managers get support in understanding what an equality goal is, and how staff in different work areas might be able to deliver them.

There has been a greater compliance with statutory training and the new training management software enables HR to be able to monitor who has attended training. It is not clear, however, what consequences there are if officers do not attend mandatory training. The peer team recommends that HR identify what outcomes CBMDC wants from officers (and Members) attending training.

The grievance process delays have improved, but it is important to continue to improve that process and have a target for resolution. Long processes have a detrimental effect on the individuals concerned, but also on teams and the council as a whole. The team suggest the council explore ways that the backlog could be cleared so that any new cases do not get held up and the whole process can be speeded up.

CBMDC needs to improve its time addressing reasonable adjustments for new starters in particular. For many staff appointed, reasonable adjustments should be made to be in place for that person to start work, and not be left until the person is in post. There are inconsistencies in managers' approach to reasonable adjustments, and also between levels of managers.

The Respect programme has been very well received, and the peers felt that this was a good programme to widen the conversations about values, behaviours, and language etc. However, like many of the great initiatives in the council, there are no outcomes being considered. The team suggest that CBMDC considers what success would look like across all the various workforce initiatives and monitor progress towards that success.

The peer team would have expected an increase in complaints, grievances etc with the increased awareness and knowledge that the Respect programme has brought. This has not happened. The team suggest that CBMDC explores why this is and takes appropriate steps if needs be.

#### **4.3. Communities**

Since the peer challenge in 2021, Bradford has been awarded the City of Culture for 2025. The council and its strategic partners are seizing this opportunity to highlight cultural activities from across the diverse population of the district. So far, BD25 (as the programme is known) is a great example of inclusive working.

There are excellent examples of involving stakeholder groups and communities in the appointment of public facing roles, and other key positions, such as the Head of HR. this was highlighted in 2021, although there were questions about ensuring that individuals and organisations were compensated for their time and expertise.

The Health Inequalities Alliance is becoming effective and is welcomed by partners. The pandemic highlighted inequalities in health, and the causes of those inequalities, and that information is being used to address wider inequalities. Co-production was key to tackling covid. Bradford is learning from that to build 'A Bradford for Everyone'. An example of this is the district-wide Anti-Poverty Strategy, which is in its early stages, but already has good traction.

There has been significant improvement in community engagement around strategic plans, both for the Council and the district more widely. This includes involvement in the capital of culture work (BD25), work with the Safer Communities Partnership Board, Systems-wide work ('systems' wide is across the public sector in the District), and work with the voluntary and community sector.

There is more work to do around to improve understanding of what a hate crime is, how it can be reported, and how to work to prevent them. The peer team was unable to establish what work was being done to improve reporting of LGBTQ+ hate crimes, although the Hate Crime Alliance has nearly 30 Hate Crime reporting centres across the district.

#### **4.4. Service design**

There is a Local Area structure for service delivery and for partnership planning. However, information that is known in a local area is not yet being used across all services. For example, in waste, the delivery service knows which residents need support to put out their bins. This information could be used to help identify residents who may need support in other areas of their lives. Information on recycling may need to be provided in different ways in different parts of the district; how is the Waste and Recycling Service addressing this? This shows that equality outcomes are not yet clearly identified for some council services.

The links between policy and service design needs to be clearer. Working in Local Areas offers an opportunity to be directly connected to specific communities.

CBMDC has such rich data sources, with more on the horizon, there is the potential for all services to use this data to ensure that services are tailored to those that need them the most or would benefit the most from them. Evaluation appears to be largely about numbers participating in programmes and projects; unpick these important numbers to ensure the council is meeting the outcomes it would like to achieve.

#### **4.5. Equality Objectives and Action Plan**

This has been revised since the 2021 peer challenge and is now more robust and outcomes focused.

Staff and community representatives acknowledge that here have been positive changes in the last 12 months.

However, it is not yet clear how all services understand the equality agenda and how that applies to individual services. It is important to recognise the risks to the council of getting things wrong in different services (for example, Housing).

## **5. Next steps**

LGA recognises that senior political and managerial leadership will want to consider, discuss and reflect on these findings.

Both the peer team and LGA are keen to build on the relationships formed through the peer challenge.

In the meantime, Mark Edgell, Principal Adviser for Yorkshire and Humber, is the main contact between your authority and the Local Government Association. Mark is available to discuss any further support the council requires.

[Mark.Edgell@local.gov.uk](mailto:Mark.Edgell@local.gov.uk) 07747 636910.

## 6. Appendix: Interim paper November 2021

### 1. Introduction

City of Bradford Metropolitan District Council (CBMDC) asked the LGA to deliver a bespoke Equality Peer Challenge, based on CBMDC's own *Equality Objectives and Action Plan*. The peer team therefore considered each of the themes in the Action Plan and gave specific feedback on the Plan itself. They therefore considered the following themes:

**Theme 1** Leadership

**Theme 2** Workforce

**Theme 3** Service Delivery

**Theme 4** Communities

**Theme 5** Equality Objectives and Action Plan

This peer challenge forms the first part of longer-term support on the Equality, Diversity, and Inclusion (EDI) agenda. As such, this is an interim feedback paper only, based on the verbal feedback given on site in November 2021. The team plans to return to Bradford in September 2022 or soon afterwards, to discuss progress and developments. After that second visit, there will be a formal report.

Peer challenges are delivered by experienced elected member and officer peers. The make-up of the peer team reflected the focus of the peer challenge and peers were selected because of their relevant expertise. The peers were:

- Councillor Muhammed Butt, Leader, London Borough of Brent
- Carol Trachonitis, Head of Information Compliance and Equality, Herefordshire Council
- Shammi Jalota, Head of Equalities and Partnerships, Essex County Council
- Becca Singh, Local Government Support, Local Government Association

The peer team used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material that they read. They prepared by reviewing a range of documents and

information to ensure they were familiar with the council and the challenges it is facing. The team then spent three days on site in Bradford, during which they:

- Gathered information and views from around 30 meetings, in addition to further research and reading.
- Spoke to more than 70 people including a range of council staff together with Councillors and external stakeholders.
- The team spent collectively around 180 hours working on this review (plus travel), the equivalent of one person spending over five weeks in the council.

This paper provides a summary of the peer team's findings. In presenting feedback, they have done so as fellow local government officers and members, not as inspectors.

## 2. Feedback

### 1. Leadership

Partners particularly recognise and welcome the leadership that the Leader has demonstrated on the equality and diversity agenda. She is highly visible and engaged as part of her community leadership role. This includes attendance at community events and memorials, which communities find valuable. Within the Council she has ensured the adoption of the Equality Action Plan and committed resources to it.

Similarly, the Chief Executive's knowledge of and commitment to equality is also clear, recognised and respected by staff and partners. This gives the council an ideal opportunity to embed the agenda throughout the organisation and indeed the district.

### 2. Workforce

Staff demonstrated high levels of commitment, enthusiasm, and passion for the District. Staff networks feel that their voice is beginning to be heard again.

There are some good initiatives, such as the significant numbers of young people on the Kickstart programme, but work needs to take place to determine what proportion will be successful in securing a permanent role.

More generally most grievances are around management behaviour. Managers are inconsistent in applying workforce policies and procedures; the team heard that there can be a lack of compassionate leadership and flexibility in management. Personal equality objectives are not fully understood as they are not always negotiated or discussed between employee and manager.

There is no compulsion for people that manage staff to understand equality issues such as reasonable adjustments. CBMDC provides some good training and support packages however data shows that these are not universally accessed. This includes mandatory training, such as Data Protection and Information Governance which both relate directly to work around EDI.

CBMDC needs assurance that it can reflect the communities it serves, in particular disability and LGBTQ+. Actions are needed to address this across all EDI characteristics. Workforce data is published, but it would be more useful if the council linked this to the local population, and identifies what measures are in place to close any gaps that exist. It is also important that the council considers how people experience discrimination or inequality for multiple reasons, for example, as a disabled African-Caribbean woman.

CBMDC needs to recognise the corporate risks of officers, staff and members not being up to date on mandatory training, and the risk that this, and the other workforce practices referred to, presents in terms of demonstrating consistent compliance across aspects of the legislation.

### **3. Service Delivery**

There are some excellent projects that support work around equality including Active Bradford, JUMP, and the bid for City of Culture. However, the council could be clearer with its narrative about how these projects will improve outcomes for residents in the district. CBMDC is not always explicit when it has funded or led work, so the council does not always get credit where it is due.

The team recognise that directorate service planning will be more directly focused on inequalities than the high-level Corporate Plan, but the plans do not appear to be clearly connected.

Community groups reported that information is not shared across departments.

“Born in Bradford” in a partnership initiative which is clear on its narrative, purpose, and impact.

#### **4. Communities**

The ‘Behind the mask’ campaign was seen as very positive with good impacts.

There are excellent examples of involving community representatives in the recruitment of key staff, for example the Head of Communications. This has been cited in work with other councils.

Community organisations are well engaged with the council’s work, but there is a risk of taking advantage of the goodwill and commitment of Voluntary and Community Sector (VCS) organisations with their limited resources. If more CBMDC staff understood community needs better, whilst still maintaining good relationships with VCS organisations, this capacity could be less stretched.

Several VCS organisations are at risk due to reliance on short-term funding. This can affect their ability to take on property leases, where landlords may want longer-term contracts. CBMDC could consider imaginatively how it could help support VCS organisations, such as how it uses its own property for meetings or offices.

There are strong relationships with strategic partnerships such as health and police. However, strategic partners and VCS partners say that the council is disproportionately focused on race and faith issues. The Council needs to counter this perception and ensure it is seen to be focussed on and emphasising all equality characteristics. The peer team did not meet any LGBTQ+ or disability groups, to test this out fully because the relevant invited contacts did not come to the stakeholder focus group.

The Council also needs to ensure that as much emphasis, if not more, is placed on community actions and outcomes as on the workforce.

#### **5. Equality Objectives and Action Plan**

The current document makes little reference to delivering better community outcomes. As a result, the team suggest that it is redefined as an internally focused document.

The Council Plan sets out objectives and targets that could address the requirements



in the Public Sector Equality Duty (PSED). However, links could be made explicit. Equality Objectives could be extracted from the Corporate Plan and their delivery demonstrated in a new Action Plan. If the Leader and Chief Executive introduced this new, externally focused document it would speak volumes publicly.

These equality objectives should form an integral part of the council's performance management framework. CBMDC needs to recognise the corporate risk if it is not able to assure itself that it is fully legally compliant. The lack of clear equality objectives and monitoring progress towards them makes it harder to demonstrate.

However, any new Action Plan (and other documentation) would benefit from a greater balance between workforce and community and between race/faith and the other protected characteristics.

Likewise, the Council has said that it wants to ensure that, in addition to the protected characteristics, Council staff should consider the impact of decisions on low-income groups. Awareness of this seems low but such a focus would clearly be consistent with the intersectional nature of inequality.

The Council should look to improve the overall narrative around its activity and intended outcomes to ensure it gets the credit where it is due.

### 3. Recommendations

#### **Recommendation 1**

Develop a more balanced narrative around equality, particularly improving the council's approach to equality on sexual orientation, gender, disability, and other characteristics that may or may not be legal protected, including low income. This will provide explicit recognition of the intersectional nature of inequality. It should also ensure you can provide a clearer narrative and set of actions and outcomes, feeding into decision-making and service design.

#### **Recommendation 2**

Consider the Equality Lead reporting directly to the Chief Executive to demonstrate the importance and commitment to the agenda.

#### **Recommendation 3**

Refresh the current “Equality Objectives and Equality Plan” document to focus explicitly on the internal corporate equality health of the organisation.

#### **Recommendation 4**

Publish Equality Objectives and Action Plan that directly link to each Corporate Plan priority and include community-focused outcomes. Link the Corporate Plan explicitly to Service Delivery Plans, Team plans and Personal Development Plans. Ensure that it is clear how equality objectives will be delivered, by whom and how they will be resourced. This should be done as a matter of urgency.

#### **Recommendation 5**

Increase the capacity of the council to work on the EDI agenda by explicitly expanding policy officers’ remits to include equality (in the broad way defined in recommendation 1).

#### **Recommendation 6**

All people managers to attend mandatory equality training, particularly about making reasonable adjustments for disabled staff.

#### **Recommendation 7**

Publish workforce equality data, referring to how the workforce reflects local communities, particularly LGBTQ+ and disabled communities.

## **4. Next steps**

The peer team have agreed that this is an interim position for CBMDC and have agreed to return around September 2022 and will set a date as soon as possible.

Becca Singh [Becca.singh@local.gov.uk](mailto:Becca.singh@local.gov.uk) will remain in contact for the duration of the bespoke equality peer challenge programme. She will work directly with the Equality Co-ordinator to support delivery of the recommendations. Other support may be identified in the meantime.

Mark Edgell, [Mark.edgell@local.gov.uk](mailto:Mark.edgell@local.gov.uk) is your Principal Adviser for the Yorkshire & Humber region.