



NORWICH
City Council



equality
for all



Equalities monitoring guidance



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1 What is equality monitoring?

Equality monitoring is the process the council uses to collect information about service users and (potentially) non-users, as well as information on residents.

This is not a bureaucratic data gathering exercise, but a tool for the council to analyse the use and experience of services by different groups of people, where necessary taking appropriate action to improve these.

Analysing equalities data can show:

- whether the service is being used by a specific group
- if different groups of people have specific needs
- under or over use of a service by different groups
- direct or indirect discrimination
- evidence that services are not discriminatory
- service effectiveness
- how to shape new and existing services around customer needs
- how a service should be changed.

It also allows the council to show:

- our services are delivered in a fair and equal way to all customers
- that customers who use our services are not disadvantaged because of the way we deliver our services
- increasing understanding of customer needs
- whether satisfaction rates vary between different groups of people.

In summary, we need to collect equality monitoring data in order to:

- highlight inequalities
- investigate the causes of inequality
- take action to reduce and remove barriers for people accessing services.

2 Critical drivers

- The Race Relations Amendment Act 2000 placed a duty on public authorities to collect ethnicity data about its workforce. The council also has a duty to promote race, gender and disability equality.
- The council is committed to attaining the achieving level of the Equalities Framework for Local Government, in order to reach this we need to demonstrate an understanding of our customer base.
- There is a statutory requirement to demonstrate that services comply with 'general duties' such as promoting equality of opportunity. This is through carrying out diversity impact assessments of our policies and functions. It is difficult, if not impossible, to prove that equalities duties have been met if monitoring data is not available. Monitoring results will provide us with a benchmark for future planning against which progress can be measured.
- The Equality and Human Rights Commission's code of practice on the gender duty states that '...you will need to set up systems for ensuring that you have the right data to determine gender equality priorities and monitor progress towards gender equality goals. This data should include data on the gender profile of your service users and potential service users....'
- The strongest driver for equalities monitoring is performance. If the council is not meeting the needs of all its customers then it fails to meet local and national targets and overall performance will suffer.

3 Equality monitoring at Norwich City Council

The customer contact team collects equalities data on customers at a corporate level.

The team have been trained in how to ask for the information and are able to explain to customers why the council is collecting equalities data. Customers are asked for information relating to their ethnicity, gender, age and disability (yes or no) either by phone or face to face. This information is stored in the council's corporate data management and workflow system (Civica). This data is collated and analysed in order to inform the statutory equality schemes which must be published regularly to demonstrate our knowledge, commitment and adherence to the equalities duties.

Equality monitoring at service level

- Equality monitoring is not an end in itself. It is a useful tool to help service areas plan, improve or change services. This will be achieved through the analysis and interpretation of the information collected through equalities monitoring.
- Consideration should be given to the time and resources needed to collect data, against how useful the data will be and what benefits it will bring in terms of service planning/improvement.

Is the data relevant? Is the time required to collect and analyse it proportionate to need?

- Equality monitoring should not take place in isolation, but be part of an overall strategy of consultation, auditing, training and planning.
- All monitoring information is classed as personal/sensitive data under the Data Protection Act and must be treated as confidential. Monitoring data should never be published in any way that makes it possible to identify individuals. It must be kept secure and up to date.
- Service areas may choose to include equalities monitoring questions in correspondence with customers, for example customer satisfaction surveys. This type of monitoring should be anonymous if possible, however, if the monitoring is not anonymous please refer to the council's data protection guidance for officers and the council's guidance on protective marking. This guidance can be found on e-grapevine.



4 An example monitoring form

We believe everyone should have equal and fair access to services and facilities. We aim to prevent anyone being discriminated against. To help us make sure we are meeting these aims please complete the section below.

You do not have to answer these questions. If you choose not to answer these questions it will not make any difference to the service you receive.

The information you provide will be only used for monitoring and is strictly confidential.

Date of birth _____

Gender Male Female

First part of postcode eg NRI _____

Ethnic group

White

- British
- Irish
- Any other white background

Mixed

- White and black Caribbean
- White and black African
- Any other mixed background

Asian and Asian British

- Indian
- Pakistani
- Bangladeshi
- Any other Asian background

Any other

Please specify _____

Black and black British

- Caribbean
- African
- Any other black background

Chinese

- Chinese
- Chinese other

Gypsy/Traveller

- Romany Gypsy
- Traveller – Irish origin
- Traveller – other

Do you consider yourself as having a disability? Yes No

5 What other information might your service area need to collect?

Disability

The council collects information at a corporate level on disability. When a customer contacts the authority they are asked if they have a disability. However, this information alone does not tell us anything about the customer's needs. We cannot make assumptions about a person's needs based on information provided on an equalities monitoring form.

So, if you need to find out about specific needs eg physical access, ask if there are any access requirements and what they might be.

An example question relating to access needs:

Do you have any physical or sensory access requirements? eg working loop system, large font, wheelchair accessible

Sexual orientation

Although sexual orientation is often seen as a more sensitive area to monitor, the reasons for doing so are the same as for other equality areas. Once again, unless there is a clearly stated reason not to, this information must always be collected anonymously.

There are a number of key issues to consider when monitoring sexual orientation:

- Some lesbians, gay men and bisexual people may not feel safe declaring their sexuality. If the information is not anonymous you must ensure it is collected, collated and stored confidentially.
- This information is sensitive personal data and must be treated as such, for detailed guidance on the collection and maintenance of this type of information, please refer to the council's data protection guidance for officers and the council's

protective markings guidance. For further guidance contact the council's data protection officer.

- People of different generations may use different language to define their sexuality. For example some older people may define themselves as homosexual rather than lesbian or gay.
- It is important to include heterosexual to ensure all orientations are covered.
- Sexual orientation monitoring should not be asked on surveys of people under 16.
- There must always be the option not to participate, it should not be a mandatory question.

An example sexual orientation monitoring question:

Sexual orientation:

- Heterosexual
- Lesbian/gay woman
- Gay man
- Bisexual
- Prefer not to say

Gender identity

Questions on gender identity should always be in their own section on a monitoring form and should only be included if the information is anonymous. Requesting information on sensitive personal information should always be where it is relevant and useful information which helps to shape services.

Press for Change, the main UK organisation lobbying on behalf of trans people, suggests the following equality monitoring question if there is a clearly identified need to include trans monitoring:

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

- Yes
- No

For more information see the Press for Change website: www.pfc.org.uk

Religion and belief

As with sexual orientation, religion and belief is often seen as a sensitive area to monitor and again, unless there is a clearly stated reason not to, this information should always be collected anonymously. The issues to consider when monitoring religion and belief are as follows:

- If the information is not anonymous you must ensure it is collected, collated and stored confidentially.
- This information is sensitive personal data and must be treated as such, for detailed guidance on the collection and maintenance of this type of data please refer to the council's data protection guidance for officers and the council's protective markings guidance. For further guidance contact the council's data protection officer.
- You must never make an assumption about a person's religious background based on race or appearance. To avoid making assumptions always ensure it is the customer who selects the category they feel defines their identity.
- More information on religion and belief issue can be found on the Equality and Human Rights Commission website: www.equalityhumanrights.com

An example religion/belief monitoring question:

Please tick the appropriate box to describe your religion or belief:

- | | |
|---|------------------------------------|
| <input type="checkbox"/> Buddhist | <input type="checkbox"/> Christian |
| <input type="checkbox"/> Muslim | <input type="checkbox"/> Hindu |
| <input type="checkbox"/> Jewish | <input type="checkbox"/> Sikh |
| <input type="checkbox"/> No religion | |
| <input type="checkbox"/> Other (please specify) | |
| <hr/> | |
| <input type="checkbox"/> Prefer not to say | |

6 Key points to remember

- Always explain to customers why equalities information is being collected and what it will be used for. Remember to let people know that the information given is confidential.
- Successful equalities monitoring relies on an individual's perception of their own personal identification. To ensure consistency of data quality, services need to adhere to this principle and not prompt or attempt to classify people yourself.
- It is important to understand why additional data is being collected, what are you trying to achieve?
- Who will collect and analyse the data and how will the data be fed back into service planning?
- All anonymous equalities data collected by service areas must be stored in the following shared folder under the correct service area heading: **Equality Monitoring Data** to ensure other services can access the information where necessary.
- Where a service area has collected data on age, gender, disability or ethnicity linked to individual customers the following procedures must be followed: `<\\Sfil2\Shared folders\ICT\System\Projects\Project Links\Corporate monitoring links\Procedure for inputting equalities data into civica vs.l.doc>`
- Where a service area has collected data on sexuality and/or religion/belief linked to individual customers the council's guidance on data protection and protective marking must be followed, this guidance can be found on e grapevine. For further guidance contact the council's data protection officer.

7 Service area reporting requirements

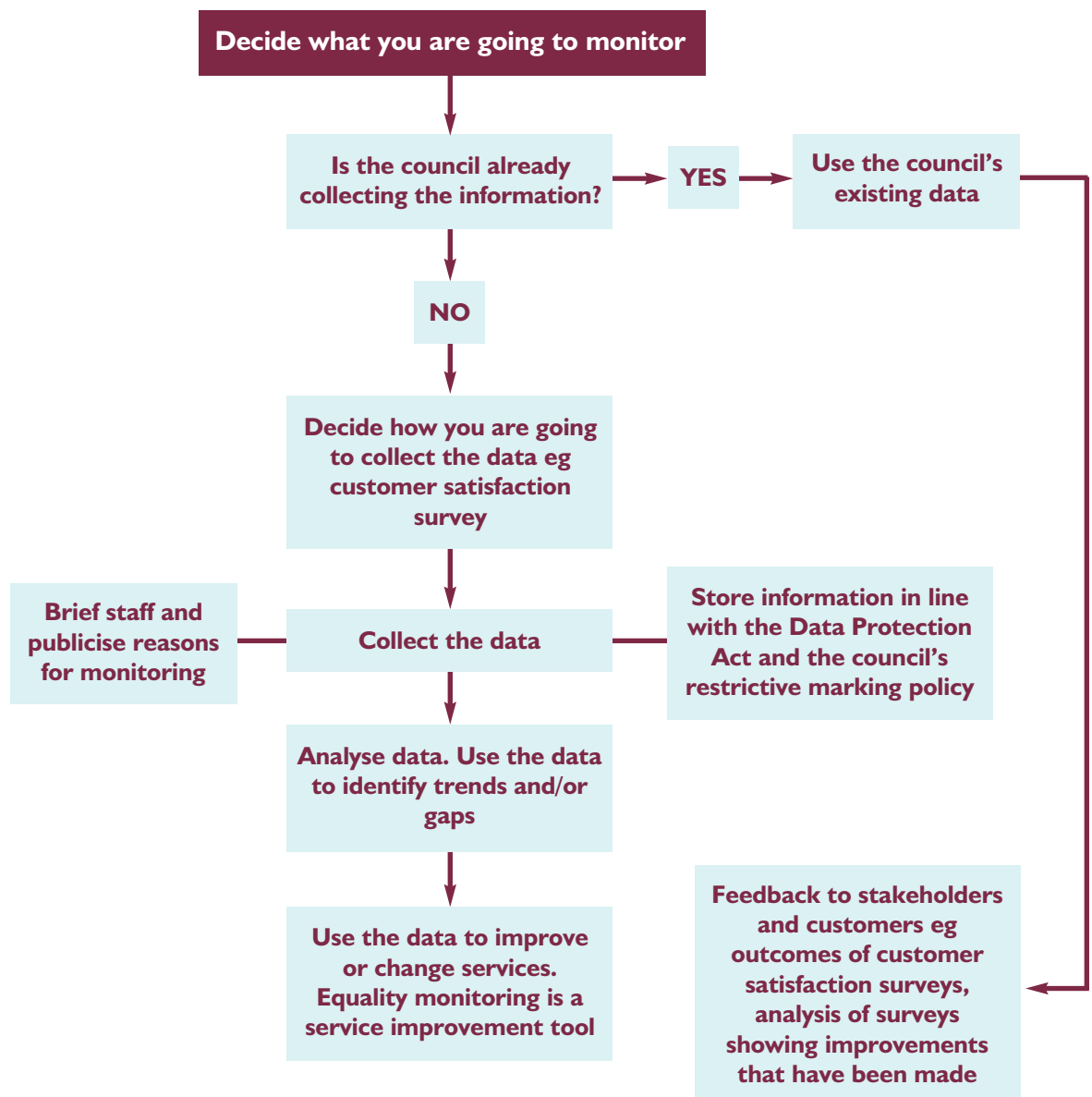
Where a service is holding anonymous equalities information in the shared area the service area will be responsible for analysing and maintaining the data.

Reports can be provided in hard copy or electronically; on the profile of our customer base using the information that is stored in the corporate customer contact and management system (Civica).

These reports can be refined to specific service areas and correlated against other relevant data such as numbers of complaints received. All reporting requests should be made using the appropriate form held on the intranet.

Once the report has been built it is the responsibility of the service area to run the reports, monitor them and address any issues that may be identified.

Appendix I The equality monitoring journey



Appendix 2 Top tips for equalities data analysis

Why use statistics?

Using statistics allows us to draw conclusions from limited amounts of information, through estimating likely results rather than having to ask every person the same question.

The following guidance applies regardless of whether we are counting local council tenants survey responses, looking at event satisfaction results, or reviewing national census data.

Who or what are we counting?

100 per cent accuracy only comes from asking 100 per cent of the population the same questions and receiving a 100 per cent response rate. Since everyone would have to respond, this is unlikely to ever happen, even with the national census, so any survey undertaken regardless of size is a **'sample'** of the population.

Wherever possible samples should be representative of the total population you want to find out about. For example if one in three residents is aged between 16 and 30, avoid having a sample where this group makes up one in four of the sample.

The devil is in the detail

'Confidence intervals' help ascertain the margin of error. The most commonly used calculation is based on the probability that 95 out of 100 times (95 per cent) the people sampled are likely to give the same result when asked the same questions. Put simply, the confidence interval is the range within which we expect the results to fall.

56 per cent of the employees of Norwich City Council responded to the staff survey of 2010. Their views give us a general idea of job satisfaction, shared characteristics and management of the organisation, which can be applied to all employees with **95 per cent** confidence.

It cannot be assumed that views expressed by a sample represent all groups within the population. The **'weighting'** of data in order to try and ensure responses reflect the general population is applied to counter bias, since some groups are more likely to respond to a survey than others.

In the previous example if we know one in three of the population is aged 16 to 30 but only one in four respondents were in this group, we would need to weight the answers of those who did respond to more accurately reflect the size of this group in the overall population.

Top tips for equalities data analysis

Tip 1 – It’s all about context

Use methods which ensure good quality data and analysis of that data:

- Be thorough about what the data may be telling you.
- Ensure that each statistic used is explained in context.
- Make comparisons and cross reference data.
- Note that hard data does not equal absolute truth.

Saying “**30% of employees who were unhappy with their manager were from a BAME background**” may or may not be particularly noteworthy.

If we had said “**30% of employees who were unhappy with their manager were from a BAME background compared with 10% of all employees belonging to BAME groups**”, then we are alerted to a potential issue.

However we may also want to consider how many responses we actually received from this group. If it was only ten then it is possible that this reflects only the views of a small number of a small number.

This is not an example from the staff survey (2010), as we didn’t have enough responses from BAME employees to come to robust conclusions about any of the questions asked.

Tip 2 – Avoid making assumptions

- Consider how many people responded to a survey, and how many people may have responded from a sub-group.
- The fewer people who respond, the more difficult it is to be confident that the group view is represented.
- The larger the sample, the more confidence we can have with the data.

In the staff survey (2010), the confidence interval for the transformation directorate was + or – 21.9 per cent. There were 20 responses from the transformation directorate out of a total of 575 across the organisation, which is 4 per cent of respondents.

So we are 95 per cent confident that the results for the transformation team are within a 21.9 per cent range.

This is a very wide error margin, so we can conclude that the spread of responses is too great for us to be confident about the results for this sub group.

Tip 3 – Check how reliable it is likely to be

- Data for a group with 10 or less people is statistically unreliable, and could identify individuals.
- If the majority of people from a particular group answered in a certain way do not assume that those views therefore represent that entire group, particularly when dealing in particular with smaller population groups.

Much of the data on religion or belief collected in the staff survey (2010) involves numbers of 10 or less people. It is therefore not possible to analyse data on any groups other than **Christian (42%), No religion (41%) and those who prefer not to say (14%)**. This is because a response made by a handful of people is not going to represent the whole of a sub group, and also may identify individuals in that group.

Tip 4 – Collect personal data for a reason

Where we have an option, rather than a statutory requirement, we should only ask for personal information in order to:

- find out whether people are satisfied or not with our services and how they might be improved
- identify potential patterns of identifiable discrimination or inequality
- highlight potential gaps in services and take up of services, or whether there are any groups overlooked.

All projects collecting, maintaining and storing personal data must have a privacy impact assessment undertaken.

In the staff survey 2010, **61 per cent of respondents who were female in comparison to 31 per cent of respondents who were male said that they would not feel able to report bullying/harassment without worrying that they would be treated in a negative way.**

We also know:

1. **that there are fewer male respondents (41%), than female (53%),** indicating that the amount of data available is quite reliable.
2. from the researchers that the general pattern across local authorities who used their surveys and from our own results that negative responses are predominantly from the male sub-group.

This discrepancy in figures is interesting. And we can conclude that the data will help HR target its attention on how women perceive the support tools available to them, and management of bullying and harassment in the organisation.

Tip 5 – Avoid data protection breaches

When collecting personal information, the Data Protection Act applies:

Principle 2 Personal data must be obtained for lawful and specific purpose.

Principle 3 Personal data collected must be adequate, relevant and not excessive.

A local authority undertakes a consultation on car parks in the town centre. They ask people to complete monitoring forms. These forms include questions on gender, age, disability, sexual orientation and religion or belief; once completed the forms are stored away, and the personal information is not used.

Is this in compliance or in breach of the Data Protection Act bearing in mind the above principles?

If you don't know why you are asking, or what exactly the data will be used for, you probably shouldn't be asking.

It is advisable to ask for personal information anonymously through a separate monitoring form. All surveys should adhere to this policy unless it is a requirement for the service, such as some housing related forms.

Tip 6 – Why bother

Collecting personal data can help build a customer profile, knowing what matters most to residents and how to target services. Ensuring this data can be compared with regional and national data can help shape a picture of what characteristics define respondent groups.

Contrary to popular belief, Norwich does not have an ageing population. The largest age group were aged 16 to 29 years old at **30 per cent of the population** in the mid-year estimates by the Office of National Statistics for 2008, as opposed to only 16.5 per cent in Norfolk as a whole.

But relying on statistics alone to inform us is not advisable, and it is important to gather qualitative data by engaging with residents, voluntary and community sector agencies and private sector companies as relevant to our research.

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