

## Equal Opportunity Policy

***Making a difference  
Make equality of opportunity a reality.***

### Introduction.

Equality of opportunity underpins all that we do as a local authority from the way we provide services to the way we employ our staff.

We intend to mainstream equalities considerations into everything that we do through:

- ❖ A clear statement of intent – our vision and LA corporate priorities make clear that Harrow is striving for a community that is cohesive and strong, which strengthens Harrow's local community by valuing the rich diversity of our local community
- ❖ 'equality proofing': to ensure that our policies and practices are not inherently discriminatory and to prevent disadvantage in their application
- ❖ Communication and consultation
- ❖ Clear allocation of accountability
- ❖ Identification, promotion and implementation of best practice
- ❖ Taking action to eliminate unlawful discrimination
- ❖ Monitoring, evaluation and adjustment of policies, practices and services.

### General statement

We believe in the need to eliminate unlawful discrimination and to promote equality of opportunity in all that we do. We recognise the rich diversity of Harrow's population as a strength and we aim to treat all people with dignity and respect whilst recognising the value of each individual and the positive contribution they make to Harrow's diverse community and workforce. ***(Article 2: Right whatever their ethnicity, gender, religion, abilities, whatever they think or say, no matter what type of family they come from).***

We aim to ensure that all groups and individuals within the community and the workforce are given the full opportunity to benefit from the services and employment opportunities we provide. No service user or potential service user, employee or potential employee will be unlawfully discriminated against because of age, being a gay man, lesbian or transsexual, colour, disability, race, ethnic or national origin, gender, marital status, political or religious beliefs, trade union activities.

This is not an exhaustive list and the Council recognises that there are other groups who may face unlawful discrimination.

### Scope of the Policy

This policy applies to all Council employees and services, and services delivered by third parties on behalf of the Council. School governing bodies control their own policy development processes and are strongly recommended to formally adopt this document.

## **Our Principles and Values.**

These are to: -

- ❖ Implement Harrow's equality policies to ensure its employment policies and service delivery policies address the needs of Harrow's diverse communities.
- ❖ Ensure services are responsive and truly accessible to customer needs.
- ❖ Plan develop and maintain effective communication and information solutions in the way we work that will enable the Council in partnership with trade unions and workforce to deliver cost effective and accessible services in the context of an appropriate work life balance.
- ❖ Ensure that workforce has the skills and competencies required to deliver a high quality service through effective recruitment and selection and development of staff.
- ❖ Encourage partnership and participation in the development and application of the Council's services, policy and practices.
- ❖ Work actively to eliminate all forms of unlawful discrimination both direct and indirect.

## **Putting Policy into Practice.**

Harrow Council will: -

- ❖ Ensure that all policies and practices are in the line with relevant employment legislation and good practice guides. Currently these are the Race Relations Act 1976, Race Relations (Amendment) Act 2000, the Commission of Racial Equality's Statutory Code of Practice on the Duty to Promote Race Equality, Sex Discrimination Act 1975, the Equal Opportunities Commission's Code of Practice, the Equal Pay Act 1970, Disability Discrimination Act 1995, the Disability Rights' Commission Code of Practice, Human Rights Act 1998, Immigration Asylum Act 1998 and the Code of Practice on Age Diversity. It will work towards the highest level of achievement as set out in the Equality Standard for Local Government. It will also plan to implement the European Community Employment and Race Directives.

Where there is no legal sanction against discrimination the Council will consult with people who are discriminated against to eliminate such discrimination.

## **Employment**

- ❖ Integrate equality of opportunity into all our functions and policies.
- ❖ Recruit and value a workforce that reflects the diverse makeup of Harrow's communities.
- ❖ Take positive action where there is under-representation in our workforce
- ❖ Ensure all employees understand the vision and corporate priorities of the Council and the standards of behaviour both towards colleagues and members of the public that we expect from them.
- ❖ Make clear the action an employee or potential employee may take if s/he feels unfairly treated
- ❖ Provide training to relevant employees so that they can actively put this policy into practice.

## Service delivery

- ❖ Provide equal access to service users and potential service users
- ❖ Provide services that recognise and are sensitive to the cultural needs of our diverse communities
- ❖ Encourage the participation of service users so that they can influence the way their needs are met.
- ❖ Seek to influence partner organisations in a collective commitment to Equality of Opportunity.

## Partners

- ❖ Require that those who provide services on behalf of the Council should have policies in place that result in services that are sensitive to the needs of Harrow's communities and demonstrate commitment to equality in terms of their employment policies and practices.
- ❖ Require voluntary organisations that receive funding from the Council to provide evidence of their commitment to equality in terms of their Personnel Policies and in the delivery of their services as a criterion in determining award of grant aid from the Council.

## Taking Action

The Council's Corporate Equality Plan will co-ordinate activity and ensures action on all aspects of this policy. It will be supported by departmental equality action plans and other policy and procedural documents that will extend certain areas of this policy document e.g. the Council's Race Equality Scheme. The Corporate Equality Plan will incorporate and be consistent with, the authority's statutory Race Equality Scheme.

The Council's Corporate Equality Plan and departmental equality action plans will: -

- ❖ Provide a systematic framework for mainstreaming equalities issues across all departments and services.
- ❖ Clearly identify the structure of responsibility for the delivery of equality
- ❖ Include the development of systems for monitoring and evaluating services as standard procedure.
- ❖ Include the mechanisms to be used to consult with staff, trade unions and service users and community organisations to establish needs and satisfaction levels and assess the equality implications on policies and practices it is considering.
- ❖ Involve Elected Members in the development and review of the Council's action plans and the development of appropriate performance indicators to ensure progress
- ❖ Ensure that information gained from the analysis of equality data is fed into departmental service planning processes
- ❖ Provide a self-assessment, audit and scrutiny framework for departments/service areas
- ❖ Identify when there is a need for equality training and ensure its delivery.

Directors and Heads of Services will be responsible for ensuring overall progress against their department's equality action plan and in ensuring it contributes fully to a co-ordinated Council Equality strategy.

Equality performance indicators (to measure both service delivery and employment) will be developed as part of the strategy for implementing these policies. Progress made in relation to these will be reported to Elected Members in the form of an annual equal opportunities report. Consultation on progress will take place at least annually with representatives of the community trade unions and staff.

### **Communicating this Policy**

All Council employees will be informed of this policy and of their responsibilities in relation to it.

All managers will be responsible for ensuring that those they manage are made aware of this policy and that it is brought to the attention of all those who join the Council as part of employee induction processes.

The policy will be made widely available to members of the community.

All those who provide services on behalf of the Council will be made aware of the Council's policy and the need for them to comply with its provisions.

### **Responsibilities for Implementing the Policy**

Providing fair and equal access to Council Services and Employment and Development Opportunities is the responsibility of the following: -

#### **❖ Council Members**

Elected Members will be responsible for ensuring that the Council fulfils its duties under the relevant equality legislation and the overall implementation of this policy.

Elected Members on a regular basis will consider progress against equality performance indicators.

#### **❖ Directors and Heads of Service**

Directors and Heads of Service will be responsible for ensuring overall progress against their department's equality action plan and in ensuring it contributes fully to a co-ordinated Council strategy.

#### **❖ Managers**

All those with management duties have a responsibility for implementing, monitoring and actively promoting this policy. Managers must ensure that those they manage are fully aware of it and their responsibilities in relation to it including the identification of development opportunities to enable staff to put this policy into practice in their work.

Every manager of services to the public is responsible for making those services equally accessible to all and for taking an active role in implementing their department's action plan.

All Managers are expected to take measures to address inequality and promote equal opportunities for all.

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Managers of Council employees have a responsibility to treat employees fairly and with respect and to take action to help and encourage employees achieve their full potential. They also have a responsibility to deal promptly and effectively with concerns expressed by staff in relation to their treatment in the workplace.

❖ **Employees**

Each employee plays an integral part in making this policy effective and should put it into practice in all aspects of their work. If they see unlawful discrimination occurring, they have a duty to report it to a relevant manager so that appropriate action can be taken to remedy the situation.

❖ **Trade Unions**

Trade unions make a positive contribution and have an important role in developing and implementing the Council's commitment to equality in both employment and service delivery

The Trade Unions have given the following commitment:

- They will work to achieve equal access to public services for all and to ensure that all users and providers of services are treated with dignity and respect, irrespective of their race, gender disability, age, sexual orientation or political beliefs.
- They are committed to participatory democracy and a belief that collective involvement is essential for the creation of effective, efficient services that are free of discrimination.
- They will provide support; advice and guidance to their members were they feel they are being treated unfairly within the workplace.

**Review of this policy**

Implementation of this policy will be monitored and regularly reviewed and assessed as part of a regular cycle of equality planning. Such reviews will take into account the views of all relevant stakeholders, both inside and outside the authority as well as elected members, trade unions and other staff groups.

**EQUALITY IN EMPLOYMENT**

**Introduction**

The Council recognises the value of a workforce in which people from differing backgrounds are encouraged to bring fresh ideas and perceptions, enabling us to deliver high quality services to all members of the community. We therefore seek to recruit a workforce which reflects, at all levels of the organisation, Harrow's diversity and we will take action to eliminate any unlawful discrimination in all our policies, practices and procedures. We will provide a safe, secure and accessible working environment that values the identities and cultures of all our employees.

We will provide equality of opportunity in all areas of employment, including recruitment selection, promotion, training and development and the retention of staff. We will ensure that all employment procedures operate in a fair and non-discriminatory way so that those best able to do the job are appointed.

Those seeking employment, training and promotion will be considered solely on the basis of their competencies and relevant experience, qualifications and skills. Employees will be treated fairly in relation to redundancy and the operation of the grievance and disciplinary processes and any performance assessment procedures.

### **Consultation – Employment**

Employees will be asked for their views on a wide range of issues and regular staff attitude surveys will be conducted with the results reported to Elected Members.

Worker support networks are supported and encouraged. A Disabled Employees' Group and Black Workers' Support Groups are established within the Council.

The trade unions will be fully consulted within the development of all Council policies on employment issues. The Employees' Consultative Forum meets four times a year to provide the opportunity for Council Members and officials of the trade unions to meet to discuss industrial relations, equality, health and safety and other employment and policy matters.

Council employment policies and practices will be regularly reviewed and consultation will take place with employees, trade unions and community representatives to evaluate their effectiveness.

### **Monitoring of Employment**

The Council will monitor by age, ethnicity, disability and gender the following:

- ❖ Recruitment and selection
- ❖ Profile of the workforce
- ❖ Training and development opportunities
- ❖ Promotion
- ❖ Incidents of harassment
- ❖ Disciplinary and grievance cases and Employment Tribunal cases
- ❖ Effects of performance assessment procedures on staff
- ❖ The number of employees who leave the Council and their reasons for leaving

Where such monitoring does not currently take place, realistic targets will be set to implement this. Regular reports will be produced from this monitoring process. The information gained will be taken into account in the development of policies, practices and procedures and in consultation with departments, trade unions, Harrow Council for Racial Equality, Harrow Association of Disabled People and other relevant organisation on the development of equality employment performance indicators. Results of monitoring will be published annually to the Employees' Consultative Forum.

### **Recruitment and Selection Practices**

Those involved in recruitment and selection will be required to follow the Council's policy guidelines as set out in the Council's recruitment and selection procedure. The Personnel Department will regularly review and monitor the implementation of this policy in consultation with trade unions.



## The Policy stipulates:

- ❖ A job description and person specification must be drawn up for every vacancy and provided to all prospective employees.
- ❖ Information about job vacancies must be made available to all sections of the community (except in situations where, in line with relevant employment legislation and the Council's Redundancy & Redeployment Policy external advertising of vacancies is restricted to protect existing employees whose jobs are potentially at risk).
- ❖ All job applications should be given details of the selection process in advance.
- ❖ All shortlisting criteria must be based on the person specification.
- ❖ All selection decisions must be made on the basis of merit.
- ❖ All those involved in recruitment and selection should receive training in the Council's recruitment and selection procedures.

## Training and Development Opportunities

The Council is committed to the personal development of every employee.

A range of opportunities are available for continuous learning and development to improve career prospects including training, planning work experience and work shadowing.

Learning and development opportunities will be targeted as part of positive action measures where certain groups are underrepresented in the workforce.

Where employees with disabilities undertaken training and development, appropriate arrangements will be made as necessary, to ensure that all opportunities are equally accessible.

We will ensure that those working part time or irregular hours, have equal access to training and development opportunities as for those on full-time standard, hours.

## Use of Genuine Occupational Qualifications (GOQs) and Positive Action

### GOQs

We will use the powers available under the Race Relations Act and the Sex Discrimination Act to appoint a person of a particular gender or from a particular racial group where gender or race is a genuine occupational qualification for the job.

### Positive action

Subject to appointment being made on merit, we will take action to achieve and maintain at all levels a workforce that reflects the diversity of Harrow's communities. We will use, where appropriate, the powers available under the provisions of the Race Relations Act 1976 and (Amendment) Act 2000, the Sex Discrimination Act 1975 and the Disability Discrimination Act 1995 to take positive action.

This will include: -

- ❖ The development of strategies to ensure that positive messages of encouragement to apply for posts are given to underrepresented groups.

Action to ensure that all employees have equal opportunities to training, development and career opportunities.

- ❖ The incorporation of diversity awareness into all management development programmes.
- ❖ Action to remedy the under representation of particular groups at particular levels within the workforce, for example developing and

offering targeted training, development and career opportunities to those groups, where appropriate.

## Harassment Policy

The Council is committed to creating a working environment where every employee is treated with dignity and respect and where each person's individually and sense of self-worth within the workplace is maintained.

Harassment or bullying within the workplace is unacceptable and any employee who feels s/he is being harassed can complain without fear of being victimised or isolated. The Council's Harassment Procedure provides a clear and effective process for handling complaints and provides for support to those making a complaint.

## Disciplinary and Grievance Procedures

The Council's Disciplinary and Grievance Procedures have been developed in consultation with the trade unions. Under the Disciplinary Procedures, unlawful discrimination against employees, clients or members of the public can amount to gross misconduct and could lead to dismissal.

## EQUALITY IN DELIVERY OF SERVICES

### Introduction

The services the Council provides are essential to the prosperity, development and daily life of our local communities. We are committed to providing quality services based on the principles of equality and taking action to ensure that our services are equally accessible to all people and appropriate and sensitive to the differing needs of all sections of Harrow's communities. We will work actively and positively in partnership with other agencies, communities and the voluntary sector with the aim of ensuring that all services are provided fairly.

### Monitoring Service Delivery

The Council will make arrangements for monitoring service delivery and usage of the services it provides to Harrow's community as well as the regulatory and enforcement functions. The Council will monitor by age, ethnicity, disability and gender:

- ❖ How often and why these groups use a service, how often they experience enforcement or legal action, how often they make complaints and why, and whether they face disadvantage or find that their needs are not met.
- ❖ Whether people from all groups are equally satisfied with the way they are treated
- ❖ Whether services are provided effectively to all communities
- ❖ Whether services are suitable and designed to meet varied needs of the community.



## Assessing the use and impact of services

Every department will be responsible for developing and implementing an action plan for equality.

Within each department's equality action planning process, priorities will be identified to monitor services by age, disability, ethnicity and gender in order to: -

- ❖ Improve service provision to all users and potential users including ethnic minority and disabled people
- ❖ Identify where changes can be made
- ❖ Target better budgets and other resources to address need
- ❖ Feed equality data analysis into the departmental service planning process
- ❖ Recognise, celebrate and disseminate information on improvements and best practice
- ❖ Assess the impact of policies and functions on different groups
- ❖ Assess how different groups are affected by the function or policy, as employees and users or possible users of services

## Consultation – Service Delivery

We will actively develop effective partnerships and consultation mechanisms with community representatives, staff and trade unions to enable use to:

- ❖ Establish the needs and satisfaction levels of those using our services
- ❖ Identify users needs in relation to access to information, for example translation and interpretation requirements, providing information in alternative formats, providing hearing loops etc
- ❖ Take into account the needs of service users when new services are planned.
- ❖ Evaluate and review progress
- ❖ Provide community groups with the knowledge and understanding of how the Council operates to enable participation in the service development and improvement
- ❖ Remove barriers to participation and develop improved ways of consulting
- ❖ Consult community groups annually on progress made against the service delivery equality performance indicators

## Publishing results of assessment, consultation and monitoring

Arrangements will be made to publish the results of relevant assessment, consultation and monitoring to identify any adverse impact on different groups by age, disability, ethnicity and gender. Publication will be made available in a variety of formats e.g. translation of information into languages other than English and in formats that people with disabilities can use e.g. Braille, large print or audio tape.



## **Access to information and services**

Arrangements will be made to ensure that the public have equal access to information and services the Council provides whatever their race, disability, age and gender. A variety of formats and methods will be used to make information and services accessible to everyone.

## **Complaints Procedures**

- ❖ Each department will make its complaints procedures available in a variety of formats and languages so that it is accessible to all.
- ❖ Complaints will be monitored by age, disability, ethnicity and gender.

## **Service Planning Processes**

Mechanisms will be developed for feeding the results of equality data analysis into the departmental service planning process. Targeted, measurable and relevant equality performance indicators, taking into account the information obtained through analysis of equality data, will be set and reported to Elected Members on an annual basis.

## **IDENTIFICATION OF TARGET GROUPS**

### **Introduction**

In seeking to overcome all forms of unlawful discrimination and prejudice, the Council recognises that it can take many forms and that certain groups of people in our society are particularly at risk or vulnerable.

We are committed to making equality of opportunity a reality for all people, both in the areas of employment and in provision of services. In particular, we will be targeting the following (recognising that many people will be in more than one of the following target groups and therefore likely to face further unlawful discrimination);

### **Target Groups**

#### **Age Discrimination**

Age discrimination can affect both younger and older people, who often have their abilities stereotyped because of their age, particularly in the area of employment. Subject to the normal age of retirement being 65, the Council will ensure that applicants for jobs are selected solely on the basis of their competencies and relevant experience, qualifications and skills and that training and development opportunities and the application of other employment opportunities are equally accessible to all employees, regardless of their age. Development of services will take into account and be sensitive to the needs of particular age groups of service users.

#### **Disabled People**

Discrimination against disabled people takes many forms, and barriers are often created within society which make it more difficult for them to reach their full potential or to have equal access to the services they need. The Disability Discrimination Act 1995 recognises that there are many different types of disability, many of which are not immediately apparent and that many people who may not have thought of themselves as having a disability in the past are now protected under the Act.

The Council will take all necessary steps to ensure that the needs of people with disabilities are taken into account in all areas of its activities.



We will seek the views of disabled service users and disabled employees and take all reasonable steps to ensure that services and employment opportunities are fully accessible to them. When barriers to access are identified we will take action to overcome them.

Disabled people are underrepresented in our workforce and we will take action to encourage disabled people to apply for vacancies within the Council.

## **Minority Ethnic Groups**

The Council recognises that people may be discriminated against because of their colour, race, ethnicity, nationality or religion. We acknowledge that racism in an organisation can show itself in subtle ways by means of processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people. We are committed to challenging all forms of racial discrimination, whether it be overt or in its more subtle, but equally damaging guises. We will develop policies, procedures and practices to give people from minority ethnic groups far and equal access to Council services and employment and development opportunities.

We will seek the views of minority ethnic services users and employees in order to identify where there are gaps in service provision, information provided or equality of access to employment opportunities and we will take all reasonable steps to overcome the barriers identified.

We want our workforce to reflect the diverse make up of the population of Harrow. We will take action to encourage people from minority ethnic groups to apply for jobs within the Council and will seek to ensure that employees from these groups are proportionately represented across all grades and salary levels. We aim to ensure that minority ethnic needs, experiences and perspectives are fairly reflected within the strategic development of all-Council programmes, policies and services.

The Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2000, gives public authorities a general duty and specific duties to promote race equality.

The Commission of Racial Equality's Statutory Code of Practice on the Duty to Promote Race Equality Scheme will be part of our Corporate Equality Plan. It will summarise our strategy and approach to race equality, and to make the necessary changes to deliver our services effectively in a multi-ethnic society.

## **Gender**

The Council acknowledges that women are often discriminated against because of their gender, their responsibility for child care, their marital or economic status and that this may result in them being denied equal access to services and employment and development opportunities.

We recognise that some women may also face additional forms of discrimination because of, for example, their ethnicity, disability or sexual orientation.

We will ensure that access to employment, promotion and development opportunities do not unlawfully discriminate against women and will target opportunities to women in those areas of employment within the Council where they were underrepresented.

It is acknowledged that both women and men can be discriminated against because of their childcare or other caring responsibilities. We will ensure that employment policies, practices and procedures take particular account of the needs of employees with caring responsibilities and will continue to develop and implement family friendly employment policies.



We recognise that service delivery may result in outcomes that are different for men and women and between boys and girls. We will put in place actions to overcome these differences.

Occasionally it may be appropriate to deliver services separately to women and / or men in order to meet the individual and cultural demands.

The Council will work in partnership with other agencies to eliminate sexual harassment domestic violence and other hate crimes by taking preventive measures.

In employment, the Council will not discriminate on grounds of gender or limit women's opportunities for career advancement because of marriage, childbirth or caring responsibilities. The Council recognises that there is still an under representation of women in senior positions and will address this situation. The Council must recognise that staff with caring and domestic responsibilities may need to work part-time, flexible working hours or take a career break in order to cope with all their responsibilities. The Council must also recognise the needs of women in isolated or male dominated areas and ensure that the culture is not perceived as harassing.

### **Lesbians, Gay Men and Transsexuals**

The Council recognises that lesbians, gay men and transsexuals may be discriminated against because of their sexuality and we are committed to providing fair treatment and equal access to Council services and employment and development opportunities.

Homophobic behaviour by staff will not be tolerated. We will take action to ensure that lesbian, gay and transsexual employees are able to work within an environment which values them as individuals and is free from discrimination and harassment.

### **Religious and Political Beliefs**

The Council upholds and respects the rights of its employees, individuals and groups within the community not to be discriminated against because of their religious or political beliefs, as long as the expression of those beliefs does not impinge on the legitimate rights of others.

We will seek to ensure that where employees or members of the community have particular religious' needs, all reasonable and practicable steps will be taken to accommodate them.

### **Trade Union Activities**

The Council upholds the rights of all employees not be discriminated against for being a member or activist or a Trade Union.

The Council supports the Trade Union's right to organise within the workplace and seeks to encourage employees to participate in Trade Union activity.

**This Policy has been adopted by the Governing Body of Kenmore Park Infant & Nursery School – LA Equal Opportunity Policy and is supplemented by the schools Equal Opportunities Policy.**

**Adopted by the Governing Body: 11<sup>th</sup> October 2017**

**To be reviewed annually.**