

New Norfolk evidence based on equality, diversity, and inclusion

Introduction and background to the review

Why did you decide to carry out a review?

A key equality, diversity, and inclusion objective for Norfolk County Council in 2020/23 is to conduct a whole-Council review of how the Council works and communicates to identify any evidence of bias in the system. This is part of our continued commitment to ensuring fair and inclusive services and workplaces. The aim is to enable the Council to understand where it is operating well, and where there may be a need for change.

During the last 18 months, new issues have emerged which have brought this objective into a sharper focus – the Covid-19 pandemic, which has impacted disproportionately on people with protected characteristics, and the debate on structural racism, triggered by the death of George Floyd in America.

The Council is not aware of any other large organisations or public bodies carrying out reviews of this nature so there is no standard or best practice guidance that we can follow, making this an important and courageous step for the Council to take.

What is unconscious and structural bias?

Unconscious biases are learned stereotypes that are automatic, unintentional, deeply ingrained, and able to influence behaviour.

Structural bias is a collective practice that exists in workplaces and in wider society that creates disadvantage or indirect discrimination, in the form of attitudes, behaviours, actions and processes.

A more detailed definition of unconscious and structural bias is available in the [report to Corporate Select Committee on 14 September 2020](#) which also sets out the full scope of the review.

What did the review cover?

The review aimed to look across the whole of the County Council with two main themes of activity: workforce and service delivery.

Who carried out the review?

The lead for the review was the Chief Fire Officer (CFO), supported by the Council's Head of Equality, Diversity and Inclusion. The review was carried out by an independent consultant. External challenge was sought from expert race and disability equality advisors to provide assurance that the approach was robust and comprehensive.

What did you look at during the review?

The independent consultant was given access, in a secure way, to all relevant data sets. Open access was also given to staff across the Council. More than 500 local and national data sets were considered. Discussions were held with numerous officer experts across the Council to help analyse and obtain insight into this data and what might drive data findings.

The analysis focused on understanding whether people with protected characteristics (as defined by the Equality Act 2010) living and working in Norfolk experience the same outcomes as people who do not share these characteristics.

What were the findings?

As anticipated, the review identified positive outcomes as well as disparities (any areas where the outcomes for people with protected characteristics are different to others). It identified where:

- The Council is performing strongly
- There are disparities in Norfolk, and these reflect the national picture
- There are disparities in Norfolk, and these are unique to Norfolk (or there was no national comparator data)
- There are gaps in data sets

Can the Council address all issues?

Whilst the Council has a key role to play in the services and outcomes that people living and working in Norfolk experience, these outcomes are not solely for us to own and address.

We will take whatever steps we reasonably can to address identified disparities and build on our areas of strong performance, but we are clear that others cannot support or contribute to improvements if they are not aware of where there are potential issues. Therefore, we feel it is important to share the findings widely so that our partners are aware of the issues and collectively we can all play our part.

Is the review complete?

No, the review is not complete, but we are progressing along our journey. We planned the review in three phases:

- Phase 1 Data gathering and analysis
- Phase 2 Formulation of initial findings and potential actions based on this data/evidence
- Phase 3 Recommendations and proposed action plan for taking forward the findings of the review

Phase 1 is complete, and we are part-way through Phase 2. Phase 2 focuses on understanding the picture from the data (including sense checking and testing initial findings).

What are you going to do next?

We have carried out some limited sense checking internally, and we are now ready to share the initial findings and sense check them more widely. This includes:

Internally Departmental Leadership Teams
 Staff groups
 Union representatives

Externally Ethnically diverse communities
 Lesbian, gay, bisexual and transgender groups
 Disabled groups
 Groups representing people from other protected groups (as defined by the Equality Act 2010)

We are interested in hearing from any other groups who want to share their views and experiences with us.

Will you do another review?

Carrying out a review of this type is a significant exercise which is not yet completed. We will want to carry out a further review in the future to help us to understand whether there have been any changes because of actions we have put in place, although these actions may take some time to embed. We anticipate considering whether a further review will be appropriate in the next 4-5 years.

Who will oversee any actions from the review?

Key actions arising from the review will be added to the action plan supporting the delivery of the equality and diversity objectives agreed by the Council. The Cabinet reviews progress against these objectives annually.

In addition, the Cabinet Member for Communities and Partnerships chairs a regular Performance Board which oversees work to progress and deliver these actions.

Our progress against service specific elements of equality, diversity and inclusion are also 'tested' as part of external inspections. This includes inspections by Ofsted in Children's Services and Adult Learning, as well as inspections of the Fire and Rescue Service by the HMICFRS.

Summary findings

Headline findings

The review **did not identify any significant concerns or issues that would require immediate or urgent attention to address.**

The review identified positive areas where we appear to be performing strongly as well as disparities.

Many of the disparities identified by the review are not unique to Norfolk and are mirrored across the UK. In many cases, the Council already has plans in place to address these disparities.

The review also highlighted however that some of these disparities are persistent, and that at the current rate of change, there is a risk that the gap may not narrow. This is particularly the case for outcomes for Gypsy, Roma and Traveller Children and for Black children

Importantly, the review noted that “...*unconscious/structural biases are not always immediately obvious, and the root causes of inequalities may often be as a result of multiple factors coming into play*”. This highlights the importance of sense checking and testing the findings with others so that we have the best chance of understanding what these findings are telling us and what we could do to address disparities and to build on the areas where we are already performing strongly.

There are many areas where we were already aware of the disparities Norfolk people face and work is underway to address these. For example, Children’s Services already has a plan in place to address disparities in educational attainment. We have not included details of this activity as we do not wish to give the perception of defensiveness – we want to take an honest and open look at the findings.

Areas where we appear to be performing strongly

The review identified several areas where Norfolk is performing strongly with good outcomes for people living and working in Norfolk which are improving and/or better than the national average. These include:

In our services

1. **Children and young people from diverse ethnic backgrounds are doing better educationally than in previous years**, and the attainment gap has narrowed
2. **Gypsy, Roma and Traveller pupils in Norfolk are doing significantly better than the national average** (Key Stage 4). Note that in the UK, Gypsies, Roma and Travellers have the worst educational outcomes of any ethnic group, so this is a significant area of strength.

3. **Special Education Needs (SEN) and Education and Health Care Plan (EHCP) pupils perform better than nationally at Early Years Foundation Stage.**
4. **SEN students in Norfolk are more likely to enter sustained employment in Norfolk than SEN students nationally**
5. Adult Education evidenced **significant positive outcomes for their learners from diverse ethnic backgrounds** during 2020/21, particularly disabled learners, and this has been recognised by a national award.
6. Norfolk Library and Information Service **continues to attract a highly diverse range of service users** - disabled people and people from Black, Asian and Arabic backgrounds are active library users.
7. There is **no evidence to indicate that people from Black, Asian or Arabic backgrounds are over-represented in road traffic collisions** (which is important to note, as people from these backgrounds are over-represented in road traffic collisions in other parts of the country).

In our workforce

8. **The Council's workforce has become increasingly diverse since 2018**, employing more people from a range of ages, backgrounds and experiences. Employees from diverse ethnic backgrounds are particularly well represented in Childrens and Adults social care.
9. **The Council is employing/retaining more older people (over the age of 65) than in previous years. Rates of pay for younger employees appear to have increased** since 2017.
10. Recruitment data shows that **positive action for disabled applicants appears to be effective** in ensuring disabled people have the same opportunities to achieve employment as non-disabled applicants
11. The **gender pay gap at the Council is less than the pay gap in the UK**, which is critical given the predominance of women in the workforce, particularly working in part-time roles.

Summary findings against the key lines of enquiry

Below is a summary of key findings, set against the seven key lines of enquiry for the review. These are summaries only and it is important that they are read alongside the full report. In many cases, further work and consideration is needed to fully understand, sense check and test the findings. It is important that we do not make any assumptions, particularly where the review has identified that data is limited or incomplete.

Workforce

A. Does the Council's workforce reflect the demographics of Norfolk's working age population?

- The Council's workforce appears to be broadly representative of the ethnic diversity of Norfolk's economically active population. The workforce has become increasingly diverse since 2018.

However, a large proportion of staff do not currently declare some or all of their protected characteristics, meaning that there may be a higher level of diversity in the workforce than is currently recorded.

- Whilst the workforce in some places is particularly ethnically diverse – for example Adult Social Care, in which employees from diverse ethnic backgrounds are well represented – other services have more to do to ensure that they reflect their local populations, such as Norfolk Fire and Rescue.
- Broadly speaking, recruitment data indicates that there is no evidence of bias in relation to gender, disability, sexual orientation and gender identity. It is possible that there may be some limited racial bias in recruitment (because lower numbers of people from diverse ethnic backgrounds are appointed compared to numbers of applicants) but further analysis is needed.
- Data suggests that there is likely not bias in staff promotions by gender, disability or racial bias. However, female and disabled staff appear to be under-represented in some management positions.

B. Is the 'employee experience' for Council staff broadly similar for all employees, regardless of whether they have protected characteristics?

- In the most recent staff survey, a higher number of staff identifying as non-binary expressed dissatisfaction, compared to staff who identified as male or female.
- The data suggests overall that older female employees are more likely to raise formal grievances. The number of formal grievances raised by employees are low and have been steadily declining.
- There are higher proportions of staff voluntarily leaving the Council compared to the workforce make-up for young people (24 years and younger), social care staff, staff in lower pay grades (scale A-I) and part-time staff.
- The data for staff dismissed from the Council appears to show that there is no structural/unconscious bias as data reflects the make-up of the workforce, except for younger employees where the proportion of dismissals has increased.

Service delivery

C. Do children and young people with protected characteristics in Norfolk experience the same lifelong outcomes as people without these protected characteristics?

- Girls achieve better outcomes overall than boys (2019 at Early Years Foundation Stage, Key Stage 2 and Key Stage 4 (in line with the national picture).
- Levels of achievement of pupils from Black, Asian and minority ethnic (BAMEⁱ) backgrounds were below those for White British pupils in Norfolk and below the level of Black, Asian and minority ethnic pupils nationally (Early Years Foundation Stage).
- Black/Black British pupils have the lowest achievement rate (Key Stage 2) and achieved less well than Norfolk pupils overall at Key Stage 4. Black pupils in Norfolk perform below levels of achievement for White British pupils in Norfolk and below the level of Black pupils nationally.
- Pupils from 'Other' ethnic backgrounds achieved the lowest percentage pass rates (Key Stage 4).
- At Key Stage 4, BAME pupils in Norfolk performed at broadly the same level to BAME pupils nationally with respect to average GCSE attainment.
- Chinese and Asian/Asian British pupils in Norfolk achieved significantly better percentage pass rates at GCSE than White British and Mixed pupils. Nationally Chinese and Asian/Asian British pupils have the best BCSE outcomes.
- At Early Years Foundation Stage and Key Stage 2, the level of achievement for Gypsy/Roma/Traveller pupils was significantly below the Norfolk average (although some data was missing due to the small size of these pupil cohorts). At Key Stage 4 Gypsy/Roma pupils achieved percentage pass rates in line with White British pupils, however Irish Traveller pupils achieved significantly below this.
- In 2021, no young people from Black or Asian backgrounds were identified to be apprentices.
- In 2021, post-16 years of age, Black Caribbean young people are most likely to **not** be in education, employment or training (NEET).
- In 2019, pupils in receipt of SEN Support or an Education and Health Care Plan were more likely to be absent from school than non-SEN pupils and more likely to experience permanent exclusions than other pupil cohorts. SEN students in Norfolk were also less likely to progress to Higher Education than SEN students nationally.

- Gypsy/Roma pupils had the highest rates of permanent exclusions in secondary schools in 2019. Pupils from Gypsy/Roma/Traveller backgrounds were also significantly more likely to be absent from schools in 2019.
- No Norfolk children and young people from Asian or Other ethnic backgrounds appear to have been referred for Early Help.
- Children and young people from Black, Mixed and Other diverse ethnic minority groups are over-represented in Looked After Children (LAC), Child Protection and Care leaver cohorts in comparison to Norfolk school population estimates.
- Children and young people from Black/Black British and Mixed/Multiple ethnic backgrounds are over-represented in youth sentencing and cautions in Norfolk.

D. Do adults with protected characteristics in Norfolk experience the same lifelong outcomes as people without these protected characteristics?

- There is under-representation of adults from Asian/Asian British, Mixed/Black/Black British and Gypsy, Roma and Traveller backgrounds receiving short and long-term care support in comparison to adults from white British backgrounds and Norfolk population estimates. Direct national data is not available for comparison, but it is believed that this trend is similar for other rural county areas.
- The number of Norfolk people qualified at NVQ4+ (degree level and above) is lower than the national average, and the number of people with no qualification is slightly higher than the national average.
- The unemployment rate in Norfolk (2020) is higher than in the Eastern Region and nationally.
- Covid-19 has had a significant impact on people in Norfolk. We now understand nationally that age, ethnicity, deprivation, under-lying health conditions, employment and location have all been factors contributing to poorer health outcomes. Significant work is being carried out by Public Health to understand and address health inequalities.

E. Is the proportion of people using Council services broadly in line with Norfolk's demographic profile?

- There was a 63% increase in the use of interpreting services across the Council during the pandemic. The most requested language was Arabic (30% of all bookings), followed by Lithuanian (19%), Polish (10%), Portuguese (5.6%) and Kurdish-Sorani (4%). Ethnic monitoring across service areas does not indicate that there are particularly high numbers of Arabic service users in case-management systems.

- Customer Services does not capture data around service users protected characteristics at the front door (e.g., telephone or online enquiries) but this information is routinely recorded on Adult and Children's Services case recording systems.

F. Is the 'service user experience' for residents broadly similar across all people with protected characteristics?

- Very little monitoring data has been identified with respect to overall satisfaction levels across service users with protected characteristics, so it is not possible to determine across the Council whether service users with protected characteristics have differing levels of satisfaction. Children's Services incorporate diversity monitoring into the '*have your say*' feedback process with service users.
- We do not capture information about complainants protected characteristics for monitoring purposes. Qualitative feedback indicates there have been limited numbers of complaints from people with protected characteristics in respect of discrimination or harassment, but also that disabled service users were most likely proportionately over-represented in complaints received by the Council.
- It would be expected that images published on the Council's website, social media and physical information materials should reflect the local population – e.g., similar numbers of images of women and men; 7% of images to include people from a diverse ethnic background; 20% of images to include disabled people; 3-6% of images to include people who are in a same sex relationship etc. The review identified that prior to 2021, whilst there was a good balance of images on the web and social media of older people, children and young people and disabled people, most images were primarily of White adults and children and heterosexual couples. There was one image of a same sex couple (on the marriage and civil partnerships web page).

G. Does the Council engage proportionately with all communities, and take steps to seek out the views of people who are seldom heard?

- Whilst there is excellent practice in some areas of youth engagement work – e.g., engagement specifically targeted at young disabled people – children from Black, Asian, Arabic and Gypsy, Roma and Traveller (GRT) backgrounds are under-represented in youth participation.
- Whilst there is excellent practice in some areas of adult engagement work – e.g., engagement specifically targeted at people with learning disabilities and people who are on the Autism spectrum – adults from Black, Asian, Arabic and Gypsy, Roma and Traveller backgrounds are under-represented in adult participation.
- There is some evidence of monitoring of protected characteristics in consultations and general expectation that consultations should include some diversity monitoring and take account of differing views and experiences of people from

different backgrounds. However, this does not appear to be monitored strategically.

H. Does the Council's risk management take account of the needs of people with protected characteristics?

- There is evidence to indicate that the Council considers the needs of people with protected characteristics in its risk assessment planning.
- Engagement with diverse ethnic communities during the pandemic has informed targeted interventions to address identified inequalities with respect to the impact of COVID-19, and gaps in information about health inequalities experienced by people from diverse ethnic backgrounds in Norfolk have been identified and work is being undertaken to address these gaps, through strategic multi-agency work led by Public Health.

Full Report

New Norfolk evidence based on equality, diversity and inclusion - July 2021

Executive summary

In December 2019, the Cabinet agreed a set of equality, diversity and inclusion objectives as part of the 'Together, for Norfolk' plan. One of these objectives was to conduct a whole-Council review of how the Council works and communicates, to identify whether there was evidence indicating there might be unconscious or structural bias within the system.

The review set out to explore eight Key Lines of Enquiry to understand more about whether people with protected characteristics living and working in Norfolk experience the same outcomes as people who do not share these characteristics; as well as understanding whether people were over or under-represented as service users because of having protected characteristics.

The Key Lines of Enquiry were:

- A. Does the Council's workforce reflect the demographics of Norfolk's working age population?
- B. Is the 'employee experience' for Council staff broadly similar for all employees, regarding of whether they have protected characteristics?
- C. Do children & young people with protected characteristics in Norfolk experience the same lifelong outcomes as people without these protected characteristics?
- D. Do adults with protected characteristics in Norfolk experience the same lifelong outcomes as people without these protected characteristics?
- E. Is the proportion of people using Council services broadly in line with Norfolk's demographic profile?
- F. Is the 'service user experience' for residents broadly similar across all people with protected characteristics?
- G. Does the Council engage proportionately with all communities, and take steps to seek out the views of people who are seldom heard?
- H. Does the Council's risk management take account of the needs of people with protected characteristics?

During the course of the review, more than 500 local or national datasets were analysed and experts across the Council were spoken with to help build the narrative, giving invaluable insight into what might be driving data findings.

Where possible the available data was broken down by age, gender/sex, disability, ethnicity, sexual orientation and religion/fait h/belief, and trends were tracked over a period of three years. Other driving factors, such as deprivation, were also considered where this was deemed likely to have impact (for example, in education and health).

The review identified areas where Norfolk appears to be performing strongly compared to other local authorities or nationally. For example, attainment rates of Gypsy, Roma and Traveller pupils at Key Stage 4 in Norfolk are now significantly better than nationally, and in some areas in-line with the attainment of other pupil groups in-county. This is a huge achievement, as in the UK, Gypsies, Roma and Travellers have the poorest educational outcomes of any ethnic group. It is also the case that students with special educational needs in Norfolk are more likely to enter sustained employment in Norfolk than SEN students nationally.

It is clear the Council's workforce has become increasingly diverse since 2018 and employees from diverse ethnic backgrounds appear to be well represented in some areas of the Council, particularly in social care. The gender pay gap at the Council is also less than the pay gap in the UK. In Norfolk, employment rates generally for some diverse ethnic minorities have improved significantly since 2018.

Examples of good practice have been identified through the review. The Council is leading innovative work nationally to promote equality through the work of the Norfolk Fire & Rescue Service to enable it to target recruitment campaigns for a diverse workforce as effectively as possible. Children's Services have made strides in improving ethnicity data collection, and managers are able to evidence how the data is being used to support service improvements through focused anti-racist practice work. Adult Education have been recognised nationally for their work engaging and supporting disabled adult learners. Public Health are leading on multi-agency work to improve understanding of health inequalities across Norfolk, and the Council has also evidenced how it has used monitoring data to inform targeted interventions for communities hardest hit by the pandemic.

At the same time, it should be remembered that the purpose of the review was to provide independent analysis of where there may be bias to be addressed, to continue to inform the Council's equality, diversity and inclusion strategies.

From a service delivery perspective, the key theme to emerge is that in Norfolk, as in most other parts of the country, some young Black children tend to do less well in education, are less likely to be in further education, employment or training, be over-represented in social care cohorts and youth offending and be less likely to be referred to early help. This is also true for some Gypsy, Roma or Traveller children. From a workforce perspective, the key theme to emerge is that there is still work to be done with respect to improving data collection and monitoring around employees' "protected characteristics", which will give the Council far greater insight into employee experience in future.

What has become clear during the course of the review is that unconscious/structural biases are not always immediately obvious, and the root causes of inequalities may often be as a result of multiple factors coming into play. Where the evidence shows that inequalities exist, there needs to be consideration of how joined-up solutions across services could be developed to support meaningful long-term change.

Norfolk County Council should be commended for commissioning this review – to my knowledge it is the first local authority in the country to now fully understand where it is excelling and where there is opportunity for improvement. This means that it can target action where it is needed, and not waste time or resources on irrelevant issues. This transparent, evidence-led approach to tackling inequality is strongly recommended by central Government and offers the only genuine means to promote fair and just chances for all.

It is important to reflect that there are still significant gaps in the existing datasets, and there are likely to be aspects of the review findings which will require further exploration as a result. It is hoped that this report will provide a starting point for wider conversations and provide a solid evidence base to support future targeted interventions to reduce inequality and improve outcomes for everyone in Norfolk.

Claire Charlwood, Independent Consultant (July 2021)

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Chapter 1: The Council's workforce

As of 2020, 26% of employees' ethnicity, 43% of employees' disability status, 58% of employees' sexual orientation, 56% of employees' religion/faith and 85% of employee's marital status were unknown. There has been an increase in recording of sexual orientation and religion/faith over the past 3 years, but a decrease in capture of ethnicity, marital status, and disability data.

As a result of the gaps in the workforce, some findings with regards employee "protected characteristics", should be treated cautiously (this has been indicated below where relevant).

It should be understood that there may likely be more employees with different characteristics than the workforce data identifies, and it is important to reflect that many employees will self-define as having multiple "protected characteristics" which may impact on how they identify themselves, and more importantly how they wish and/or need to be treated by the Council as their employer.

There is no dataset available to identify whether employees have caring responsibilities for either dependent children or other family members. Although this is not a "protected characteristic" such information could provide the Council with valuable insight when considering how best to support the diverse workforce to work more flexibly in future.

Diversity monitoring in recruitment is particularly robust with less than 1% of applicants declining to provide information about their "protected characteristics".

The available workforce data includes non-schools' employees and all Adult Education sessional workers. It does not include positions that are casual. It does not include those on the NCC temporary register, employees of partner organisations or non-employees, such as agency workers and interim staff.

Key line of enquiry (A) – Does the Council's workforce reflect the demographics of Norfolk's working age population?

Does the Council's workforce broadly reflect the demographics of the working age population of Norfolk, in relation to age, gender, disability, ethnicity, sexual orientation and religion and belief?

The 2018 baseline report¹ identified from analysis of the workforce 2017 data: "NCC's workforce is more heavily skewed towards female employees than is represented in the general Norfolk population... There are far fewer younger (aged 16 to 24) people in NCC's workforce than in the economically active population, with heavier reliance on those aged 35 to 64. NCC's workforce is not quite as

¹ Lifelong outcomes of Black, Asian and minority ethnic people and disabled people in Norfolk – NCC Intelligence and Analytics Team 2018

representative as the ethnic diversity seen in Norfolk’s working age population... In terms of disability, NCC’s workforce is not nearly as representative as Norfolk’s economically active population.”

From December 2018 to December 2020 the Council’s workforce increased by **1380** employees. In this period there was around a **10%** increase in recording/declarations of employees’ sexual orientation, and religious belief, and around a **3%** decrease in recording/declarations of ethnicity, disability and marital status.

As of December 2020, **26%** of employees’ ethnicity was unknown, **43%** of employees’ disability status was unknown, **58%** of employees’ sexual orientation was unknown, **56%** of employees’ religious beliefs were unknown and **85%** of employee’s marital status were unknown.²

There is no dataset available to identify whether employees have caring responsibilities for either dependent children or for other family members. Whilst not a “protected characteristic”, this information might be useful in future to underpin other analysis (particularly with regards to gender).

The workforce – age

The December 2020 workforce dataset (used as standard) shows that there is still a picture of fewer younger people (aged 16-34) in the Council’s workforce than in the economically active population and a heavier reliance on those aged 35 – 64. This picture has not changed significantly since 2017. The latest data also shows that there has been an increase in the % of over 65s employed in the Council.

Age group	% Workforce (2017)	% Workforce (2020)	% Norfolk economically active population
16-24	3.6	4.6	12.7
25-34	16.2	17.9	22.3
35-49	38.4	35.6	31.6
50-64	39.3	37.6	33.2
65+	2.6	4.2	7.1

The workforce – gender

The latest population estimates show there are around 423,900 economically active people in Norfolk aged 16-64 years. Of these around 49% are female and 51% are male.

Within the Council, **71%** of employees are female and **29%** are male (from 68% and 32% respectively in 2017), demonstrating that the Council’s workforce continues to be heavily skewed towards female employees.

According to the latest population data, in Norfolk, 89% of males in employment are in full-time employment in comparison to 55% of females.³

² [NCC Workforce data 2020](#)

³ ONS APS - % in full time employment 2020-12

Within the Council **80%** of all male employees are working full-time in comparison to **53%** of all female employees. Female employees made up **85%** of all part-time employees in the Council as of December 2020.

The NHS SALT dataset for September 2020 shows that female employees make up **75%** of social care employees in Norfolk.⁴

Currently there is no data available to identify whether there are employees of the Council who are living as a different gender to that which they were assigned at birth. While this data is captured in Council recruitment processes, this information is not available for the general workforce.

The workforce – disability

The workforce dataset identifies whether an employee considers themselves to have a disability. Latest figures suggest that the self-defined disability status for around **43%** of the workforce is unknown (an increase from 40% in 2018).

Of the Council's employees whose disability status is known in 2020, around **three** per cent (228 employees) consider themselves to be disabled (down from five percent in 2017).

By comparison around 20% of Norfolk's economically active population are EA (Equality Act) core or work-limiting disabled (up from 14% in 2017) and around 46% of economically active people in Norfolk identify that they have a health condition or illness lasting 12+ months.⁵ This suggests that disabled people may potentially be substantially under-represented in the Council's workforce.

It is important to reflect that some employees may be hesitant to disclose a disability or long health condition, therefore there may well be more disabled employees working for the Council than are known about. It should also be noted that comparisons of workforce disability data may not always be robust as a result of different definitions being used for data capture at source.

Reasonable adjustments for disabled employees are considered on a case-by case basis. There is no over-arching monitoring mechanism to identify the numbers/types of reasonable adjustments put in place for individual employees. As additional insight, from August 2020 **132** employees submitted requests via My ICT for support with assistive technology (before this date, such requests were not monitored or collated). this would equate to 50% of all known disabled employees.

The workforce – ethnicity

The below table shows how the Council's workforce (those whose ethnicity is known, rather than the total workforce) compares with the general Norfolk working age population.⁶

⁴ [NHS Digital - Counts by Local Authority September 2020](#)

⁵ ONS APS - % EA core or work limited disabled 2020-12

⁶ ONS APS – employment rate ethnic groups 2020-12

Broad ethnic group	% Workforce (2017)	% Workforce (2020)	% Norfolk economically active pop
White	96.6	95.8	97
Asian	0.5	0.7	0.5 ⁷
Black	1.1	1.3	0.7 ⁸
Mixed	1.0	1.1	0.8
Other	0.8	1.0	1.0

While the available data indicates that the Council’s workforce appears to be broadly representative of the ethnic diversity of Norfolk’s economically active population, a quarter of the Council’s employees’ ethnicity was unknown in 2020, and therefore it should be considered that there may be potentially be a higher degree of ethnic diversity within the workforce.

The NHS SALT dataset - September 2020⁹ showed that in Norfolk:

- **95.7%** of social care jobs were held by employees defined as “White”
- **1.5%** were held by employees defined as “Black/African/Caribbean/Black British,
- **1.3%** were held by employees who defined as “Other”
- **1.1%** were held by employees who defined as “Mixed/Multiple ethnicity”
- **0.3%** were held by employees who defined as Asian/Asian British.

Ethnic minority employees in social care (all groups excluding the “White” group) make up around **42%** of all employees whose ethnicity was known/declared to the Council in 2020.

It should be considered that there may be a number of Council employees within these broad groups (including in the “White” groups) who will identify as belonging to a more defined ethnic group because of their nationality, language spoken at home, skin colour (an aspect for consideration for some and not for others), national/geographical origin and/or because of their religion.

The workforce – sexual orientation

There has been a 10% increase in recording/declarations of sexual orientation by employees since 2018, however **58%** of employees’ sexual orientation was still unknown in 2020.

The below table shows the breakdown of employees who have provided information (including those who have stated a preference not to disclose).

⁷ Data must be treated cautiously as ONS APS data estimates not available for this period

⁸ Data must be treated cautiously as ONS APS data estimates not available for this period

⁹ [NHS Digital - Counts by Local Authority September 2020](#)

Sexual orientation	% Workforce (2017)	% Workforce (2020)
Bisexual	0.9	1.9
Gay man/Lesbian woman	2.5	3.1
Heterosexual	92	90
Prefer not to disclose	4.5	4.6

There are no accurate local estimates for LGB people living and working in Norfolk for comparison, however in 2018 ONS stated that in the UK “the proportion identifying as lesbian, gay or bisexual (LGB) increased from 1.6% in 2014 to 2.2% in 2018. In 2018, there were an estimated 1.2 million people aged 16 years and over identifying as LGB.”¹⁰

The current workforce data is suggestive that there may have been a small increase in employee confidence to declare their sexual orientation.

The workforce – faith/religious belief

56% of employees’ religion was unknown in 2020. There has been a **10%** increase in employee recording/declarations of their religion from 2018/19.

The below table shows the breakdown of employees who have provided information (including those who have stated a preference not to disclose).

Religion	% Workforce (2020)	Norfolk %¹¹
Christian	38.4	62
Muslim	0.3	0.6
Buddhist	0.5	0.3
Hindu	0.3	0.3
Jewish	0.2	0.1
Sikh	0	0.1
Any other religion	3.3	0.5
None	52.2	29.6
Prefer not to disclose	4.9	N/A

The % of employees who are Christian would appear to be considerably lower than the overall Norfolk population, however these figures are taken from the 2011 Census and include people who are economically inactive. It should be noted that the % of employees who state they do not have a religion is considerably higher than the Norfolk population.

Recruitment at NCC

To further understand the make-up of the workforce, recruitment data from 2020 was analysed and compared with 2018/19 data where it was available/possible to do so.

The Council’s recruitment data is likely very robust, given that every applicant is asked to complete a diversity monitoring form as part of the application process.

¹⁰ [ONS - Sexual orientation in the UK - 2018.](#)

¹¹ [2011 Census - Norfolk Insight](#)

Less than 1% of applicants did not answer any questions about their “protected characteristics” in 2019/20.

It is important to note that monitoring data is not included when applications are passed to managers for shortlisting, (although managers are advised if applicants have declared a disability or are a veteran). Where disabled applicants meet the minimum essential criteria in their application, they should automatically be shortlisted for interview by the recruiting manager.

Recruitment – gender

The recruitment dataset includes more sensitive monitoring of gender identity and includes data about people who identify as “living in a different gender to the one assigned at birth”.

In 2020, **66%** of all applicants were female in comparison to **33%** male applicants. Less than 1% of applicants identified as living as a different gender to the one assigned at birth. In 2018/19 63% were female in comparison to 37% of male. Again, less than 1% identified as living as a different gender to the one assigned at birth.

In 2020, **33%** of all female applicants were shortlisted and **12%** were appointed. This compares to **25%** of all male applicants who were shortlisted and **8%** appointed. The percentages were in line with 2018/19.

It is worth noting, (taking into account the very small numbers in this cohort) that **34%** of applicants living as a different gender to the one assigned at birth were shortlisted in 2019/2020 while **7.5%** were appointed.

This recruitment pattern is in keeping with the predominance of females in the Council’s workforce and may indicate some biases driving recruitment of female employees.

Recruitment – disability

In 2020, applicants declaring a disability made up **8%** of all applicants. **36%** of all applicants declaring a disability were shortlisted and **10.6%** were appointed. By comparison **29%** of applicants who did not declare a disability were shortlisted and **10.9%** were appointed.

This is suggestive that the shortlisting process for disabled applicants at the Council is effective and not subject to bias.

Recruitment – ethnicity

In 2020, **91.3%** of all applicants identified as “White”. “Black, African, Caribbean/Black British” made up **2.8%** of all applicants and “Asian/Asian British” made up **2.2%** of all applicants.

In 2020, **29%** of all White British applicants were shortlisted and **11%** were appointed. By comparison **23%** of all Black/Black British applicants were shortlisted and **8%** were appointed and **19%** of all Asian applicants were shortlisted and **4%** were appointed.

Interestingly of those applicants who stated that they “preferred not to disclose”, (1.3% of all applicants), **35%** were shortlisted and **14%** were appointed.

In 2018/19 the ethnicity data was aggregated to “BME”, “White” and “Undisclosed” so it is difficult to draw statistical comparisons. Having said that **92%** of all candidates identified as “White”, and **6%** as “BME”.

In 2018/19 **39%** of White candidates were shortlisted and **12%** were appointed, in comparison to **31%** of BME candidates shortlisted and **8%** appointed.

This analysis is worth further monitoring and exploration as it may indicate that unconscious racial biases may come into play in recruitment processes within the Council (given in some instances fewer people from particular ethnic backgrounds are being appointed by comparison to the percentages of people submitting applications).

Recruitment – sexual orientation

In 2020, **86.8%** of all applicants stated they were heterosexual, **3.6%** stated they were bisexual and **3%** a gay man/lesbian woman. **6.5%** stated they “preferred not to disclose”.

28% of gay men/lesbian women were shortlisted in comparison to **26%** of heterosexual applicants and **22%** of bisexual applicants.

13% of gay men/lesbian women were appointed in comparison to **11%** of heterosexual applicants, and **7%** of bisexual applicants.

31.5% of those who preferred not to disclose were shortlisted and **9.6%** were appointed.

In 2018/19 the percentages of applicants in each cohort shortlisted were similar (at around **36%**) and appointment rates were also more similar at around **12%**.

This analysis indicates that there is likely no evidence of unconscious bias in recruitment in relation to sexual orientation, and there may be more employees within the workforce who identify as gay or lesbian than currently known.

Recruitment – Norfolk Fire & Rescue Service

In May 2021 the Eastern Region Fire & Rescue Equality, Diversity & Inclusion Forum held a workshop on diverse recruitment to inform action planning around increasing diverse recruitment. Outcomes from the workshop, included leaders recognising there was a need to establish a “collaborative eastern region team of fire and rescue staff from diverse backgrounds for community outreach, education and engagement... to conduct targeted work” visiting communities to challenge preconceptions about roles in the service and encourage a greater diversity of applicants. The workshop also identified that there was a need to consider how to effectively support diverse employees who represent a minority in their team (which

psychologists highlight is a risk factor for “cognitive overload”), through wellbeing plans, staff networks and mentoring.¹²

Are employees with protected characteristics proportionately represented across pay grades/internal promotions?

Statistical findings about pay bands should be treated cautiously due to the percentages of employees whose ethnicity, disability and sexual orientation is unknown. There were 394 internal promotions in 2020 in comparison to 557 in 2018/19.

Pay grades – age

As would likely be expected, analysis of the latest published data on pay-bands (December 2020 workforce dataset) shows trends of progression across the Council’s pay bands by age. Potentially, as a result of career experience accrued, older Council employees generally appear more likely to be in higher pay bands.

According to the 2020 dataset, the 50-64 age group is more likely to be receipt of £50k plus than any other age group.

35% of employees aged 16-24 years and **39%** of employees aged 65+ years were in receipt of under £14k to £19k in December 2020. This is in comparison to just under **9%** of the 35-49 age group.

Similar percentages of employees aged 16-24 and employees aged 25-34 (around **52%** of these groups) were in receipt of £20-29k.

Similar percentages of employees aged 25-34 and 35-49 (around **28%**) were in receipt of £30-39k. Similar percentages of employees aged 35-49 and 50-64 years (around **13%**) were in receipt of £40-49k.

A comparison of 2018/19 workforce dataset with the 2020 dataset shows that employees aged 16-24 are now more likely to be in receipt of higher pay; with a reduction from **56%** in the under £14k - £19k band in 2018 to **35%** in 2020; and an increase from **37%** in the £20-29k band in 2018/19 to **52%** in 2020.

Given the age profile of the Council’s workforce it is important to reflect that the analysis of pay data suggests that more younger employees are now able to access higher pay than in previous years.

Internal promotions – age

The 2020 dataset shows the percentage of internal promotions increases fairly steadily by age to the 45-49 age group, and then falls off from 50 – 65+ years. Again, this might be expected when considering experience accrued in employment.

It should be noted that **8%** of the 20-24 years group were promoted in 2020 in comparison to **4%** of 60-64 years group. Both of these age cohorts are most likely to be in receipt of £20-29k (around **40%** of each age group).

¹² Recommendations from diverse recruitment workshop 19 May 2021 and literature review of research into fire fighter personality types

Pay grades – gender

Female employees of the Council appear to be more likely to be in the lower pay bands than male employees. The 2020 dataset shows that almost **50%**, (increasing from 43% in 2018/19), of female employees were in receipt of £20-29k in comparison to **36%** of male employees.

20% of female employees were in receipt of £30-£39k in comparison to **30%** of male employees in 2020. It is noted that the difference is less stark in the £40-49k and £50k plus bands (the latter appears to have remained fairly constant since 2018 at **7%** for male and **4%** for female employees).

In 2018/19 the Council's published equal pay data showed the (mean) equal pay gap was **8.57%**¹³. In 2019/20 this increased to **9%**¹⁴ and the latest figures for 2020 show this increased to **10.25%**¹⁵.

In 2018/19 the (median) pay gap was **9.77%**. In 2019/20 this fell to **5.41%** and in 2020 this increased to **8.15%**.

The 2019/20 unpublished report noted that the reduction in the median pay gap was due NCC having a female Managing Director (at the highest salary) who left the Council's employment in 2018.

The report also notes that the "average mean gender pay gap [for local authorities] was 6.1% in 2018/19" with a variance of -18% and 23.9%, placing the Council in the central range for local authorities.¹⁶

In 2020 the mean gender pay-gap for all employees in the UK stood at 15.5%, down from 17.4% in 2019¹⁷. It could therefore be said that the Council's pay gap compares favourably to the national picture.

The NHS SALT dataset for September 2020 shows that **15.5%** of all females working in social care in Norfolk were professionals in comparison to **8.8%** of all males working in social care.

However, **5.4%** of all females working in social care in Norfolk were in managerial positions, in comparison to **8.3%** of all males.

37.5% of all females were working in direct care roles, in comparison to **15.6%** of all males.¹⁸

Internal promotions – gender

In 2020 **72%** of internal promotions were female in comparison to **69%** in 2018/19. This is suggestive that there has been an improvement in promotion opportunities for female employees of the Council. The promotions data is noted to be reflective of the size of the female workforce overall. While the data suggests that there is likely not

¹³ [Gender Pay Gap Narrative 2018](#)

¹⁴ Gender Pay Gap – Report to Corporate Board 4th February 2020

¹⁵ Note that this data is currently unpublished and without a supporting narrative

¹⁶ Gender Pay Gap – Report to Corporate Board 4th February 2020

¹⁷ [ONS - Gender pay gap in the UK 2020](#).

¹⁸ [NHS Digital - Counts by Local Authority September 2020](#)

bias in promotions by gender, it should be noted that in some service areas females appear to be under-represented in management positions and over-represented elsewhere.

Pay grades – disability

Any analysis of disabled employees pay bands must be considered cautiously on the basis that **43%** of employees (self-defined) disability status is unknown.

Generally, it would appear that similar percentages of employees with and without disability are represented across the highest and lowest pay bands (under £14-19k, £40-£49k and £50k plus) in 2020, and there has not been a significant change in this, compared to the 2018/19 data set.

In 2020, **47%** of employees who declared a disability were in the £20-29k band, in comparison to 2018/19 when **36%** of employees who had declared a disability were in this band.

In 2020, **20%** of employees who declared a disability were in the £30-39k band, in comparison to 2018/19 when **29%** of employees who had declared a disability were in this band.

This analysis indicates that some disabled employees may now be likely to be in lower pay bands than in previous years.

The 2018 baseline report noted that with respect to Norfolk’s economically active population “Norfolk people aged 16 and over who identify as having a long-term health problem or disability are much less likely to be employed in managerial occupations and more likely to be employed in routine occupations, compared with people who do not have a long-term health problem or disability.”¹⁹ The report did not provide any analysis of whether this applied to the Council’s workforce at the time.

Internal promotions – disability

3% of internal promotions were achieved by employees who had declared a disability in 2020, this percentage has not changed from 2018/19 and is in line with the percentage of the workforce who have declared a disability. It is important to reflect that in data about disability status was missing for 48% of internal promotions, so it would be difficult to say with any certainty whether any biases may be driving statistical findings.

Pay grades – ethnicity

The percentages of employees whose ethnicity was been declared in pay bands in 2020 is shown in the below table.

Ethnicity	% £0 - 19K	% £20-29k	% £30 - 39k	% £40 - 49k	% £50k +
Asian	17.5	37.5	40	5	0
Black	4	34	54	4	4

¹⁹ Lifelong outcomes of Black, Asian and minority ethnic people and disabled people in Norfolk – 2018

Ethnicity	% £0 - 19K	% £20-29k	% £30 - 39k	% £40 - 49k	% £50k +
Mixed	9.5	47.5	27	11	5
White	14	47	21	12	6
Other	10	52	19	12	7
Prefer not	14	38	27.5	0	3.5

This analysis shows that in 2020, Asian and Black employees were more likely to sit in the £30-39k pay band, with employees who self-defined as “Other” were more likely to sit in the £20-29k pay band.

There were no Asian employees identified as being in the £50k plus pay band (although the small numbers of identified Asian employees should be considered), otherwise there appears to be a fairly even distribution of ethnicities in the highest bands.

In 2018/19 by comparison the distribution of pay by ethnicity was broadly as follows.

Ethnicity	% £0 - 19K	% £20-29k	% £30 - 39k	% £40 - 49k	% £50k +
Asian	19	43	28.5	9.5	0
Black	13	37	34	16	0
Mixed	15.5	53.5	24	3	3
White	19	43	24	8.5	5
Other	28.5	39	21	7	3.5
Prefer not	16	52	28	4	0

This shows a similar distribution across pay bands to 2020, with less ethnic diversity represented in the highest pay bands at the time. Again, it should be noted this dataset should be treated cautiously as at this time there were fewer employees who had declared their ethnicity, and the Asian group particularly represented only a handful of employees.

The NHS SALT dataset for September 2020 shows that there were no “professionals” working in social care in Norfolk from Asian/Asian British, Mixed/Multiple or Other ethnic groups. **50%** of all Black/African/Caribbean/Black British social care employees were classed as “professionals”. The same dataset shows that there were no “managers” in social care in Norfolk from any ethnic group.²⁰

Internal promotions – ethnicity

In 2020 **67%** of internal promotions were achieved by White employees, and **28%** were achieved by employees whose ethnicity was not recorded.

²⁰ [NHS Digital - Counts by Local Authority September 2020](#)

Of the employees where ethnicity was known, **4%** of internal promotions went to employees who identified as Black, Asian, Arabic or other diverse ethnic backgrounds which is broadly reflective of the % of diverse ethnic minority employees in the workforce. The data is not comparable to the 2018/19 dataset because of the way the data has been aggregated down in previous years.

This finding suggests that there is likely not racial bias in internal promotions generally across the Council, however it is important to reflect that some diverse ethnic minority employees may still not be well represented in some management positions in social care, and this bears further consideration.

Pay grades – sexual orientation

Due to the fact that **58%** of employees' sexual orientation was unknown/undeclared in the 2020, it is risky to draw any significant conclusions from analysis of the data, however it is noted that in the highest pay band (£50k plus) there appeared to be relatively similar percentages of bisexual, gay men/lesbian women and heterosexual employees (around **4-5%** for each group where sexual orientation was declared).

In 2020, **79%** of employees who stated that they preferred not to disclose their sexual orientation were in the £40-49k pay band. This is interesting as it may be suggestive of hesitancy at this pay level within the Council to declare sexual orientation. A helpful question that leadership teams may wish to ask is whether leadership team environments are conducive to senior managers feeling safe and confident to be 'out'.

Internal promotions – sexual orientation

In 2020, **49%** of internal promotions were achieved by heterosexual employees in comparison to **2%** of bisexual and **2%** of gay men/lesbian women. No data was recorded for **47%** of employees achieving promotion.

In 2018/19 **21%** of internal promotions were achieved by heterosexual employees in comparison to **3%** of gay men/lesbian women. No data was recorded for **76%** of employees achieving promotion.

Key line of enquiry (B) – Is the 'employee experience' for Council staff broadly similar for all employees, regarding of whether they have protected characteristics?

In 2021, 55% of employees responded to the employee experience survey (an increase on the response rate in previous years). The overall satisfaction score for employees with respect to "I am satisfied with the employment deal" was **66**, (an increase from 63 in 2019 and benchmarked as a moderate/capable of improvement score). The "balance of the deal" score in 2021 for all employees was **-14**.

The employee experience survey findings indicate that some diverse ethnic minority employees may have been under-represented in the survey sample comparison to the 2020 workforce dataset. This may be because some ethnic minority employees

felt less confident to respond to the survey, possibly because of concerns that they may have been more easily identifiable within their own teams or service area.

Part-time employees also appeared to be under-represented in the survey, although the gender split of the survey sample appeared to be in keeping with the overall workforce data set.

There were more disabled employees in the survey sample than were represented in the 2020 workforce dataset, which is suggestive that there may be more disabled employees in the workforce than are currently known about.

Numbers of formal grievances raised annually are low in comparison to the size of the workforce and have been steadily declining since 2018. Due to the small numbers of grievances recorded, statistical inferences should be treated cautiously. There is no information available about numbers of grievances upheld or whether these achieved a successful resolution of employee concerns.

There is limited evidence of bullying/harassment complaints being raised formally within the Council. In the 2021 employee survey, 82% of employees stated that they had not experienced bullying or abuse in the past 12 months while 10% reported that they had been bullied or harassed by a service user, 4% reported they had experienced such behaviour from a colleague and 4% from a manager. If this was a representative response from the workforce this would equate to around 300+ employees potentially having some experience of bullying or harassment from another employee.

Numbers of formal disciplinarys raised annually are also low in comparison to the size of the workforce and numbers of these have also been in decline.

Are there disparities in the experiences/views of employees with protected characteristics, compared to people who do not share the same characteristics?

In 2021, **55%** of employees responded to the employee experience survey (a key measure of satisfaction). This was an increase on 46% in 2019.²¹

In 2021, the overall score for employees with respect to “I am satisfied with the employment deal” was 66, (an increase from 63 in 2019). This is noted to be benchmarked as a moderate score/capable of improvement. The survey results have been broken down by age, gender identity, disability status, and ethnicity.

The 2021 survey sample comprised **65%** female employees (in comparison to 70% of the workforce in December 2020) and **30%** male employees (30%). 0.36% of the sample identified as non-binary and 1.3% as “other” gender. This is suggestive that the sample is broadly representative of the gender split within the workforce, taking account that the overall workforce data set does not currently capture information about employees who do not identify as male/female.

In 2020, **40%** of employees worked part-time, however only **26%** of the survey sample in 2021 identified as part-time employees, suggesting that part-time employees were under-represented in the survey sample. This is important because

²¹ The Employment Deal – NCC Organisational feedback report 2021

of the predominance of female employees working part-time at the Council, and this may mean that the survey may not have fully captured the views of females in part-time roles.

In terms of ethnicity the survey sample was as follows

- 90.1% White (96.6% in the 2020 workforce where ethnicity was known)
- 2.1% Other and 1.5% European (1% “Other” Dec 2020)
- **0.8% Black (1.3% Dec 2020)**
- **0.7% Mixed (1.1% Dec 2020)**
- **0.5% Asian (0.7% Dec 2020)**

It is important to reflect here that statistical inferences should be treated cautiously due to the different categorisations of ethnicity in the overall workforce dataset so it must be considered that employees may have categorised themselves differently when responding to the survey in comparison to how they are categorised in the workforce data.

Having said that, it appears that the survey sample shows broadly more ethnic diversity in the workforce than is captured in the overall workforce dataset, which would be in keeping with other findings in this report. The survey sample data also indicates that Black and Mixed employees may be slightly under-represented in the survey, by comparison to the overall workforce data set, which is born out by some quantitative feedback provided by some employees.

Disabled employees make up **6.4%** of the sample in comparison to **3%** of the overall workforce data set (where employees disability was declared). This suggests that there may likely be more disabled employees working for the Council than are currently known about, which would be in keeping with other findings in this report.

The survey sample does not show whether employees are lesbian, gay or bisexual, or what their religious beliefs are.

It is important to reflect that the survey sample does show that there were responses from a broad mix of diverse employees, however it should be considered that if some diverse ethnic minority employees were under-represented in the survey, then it would be important to consider why this is may be the case, and what else needs to be done to ensure that their voices are heard.

The “balance of the deal” score in 2021 for all employees was **-14**.

Those aged 24 and younger had the most positive score at **-8**, with those aged 55 and over less positive at **-15**.

Female employees felt only marginally less positive about the “balance of the deal” (**-14**) than male employees (**-13**) and those who classified as “Other-gender” were significantly less positive (**-21**). Female employees were more positive about organisational engagement (79) and perceived organisational support (66) in comparison to male employees - (77) and (63) respectively.

The “balance of the deal” score for disabled employees was **-16** in comparison to **-14** for non-disabled employees, suggesting that they felt slightly less positive about the deal. It is noted that there has been a significant improvement in the score of disabled employees since 2019 when they scored -21.

Disabled employees scored “perceived organisational support” lower (62) than non-disabled employees (65), and “employee capability” much lower (77) than non-disabled employees (81).

Asian/Asian British employees gave a much more positive “balance of the deal” score (**-11**), with employees from “Other (ethnicity)” giving the least positive score of all ethnic groups (**-19**). Black/Black British employees scored **-17**.

Asian/Asian British employees gave a high score for “perceived organisational support” (76), in comparison to “Other (ethnicity)” (57). Mixed/Multiple ethnicity employees gave a lower score for “perceived organisational support” overall (74) but their “balance of the deal” score was more positive overall than employees generally (**-13**).

The 2021 survey included questions around bullying and harassment for the first time. The organisation was benchmarked as having a moderate score/capable of improvement for this question (68). It is noted that **83%** of employees stated that they had not experienced bullying or abuse in the past 12 months, while 10% reported that they had received this from a service user, and 4% from a colleague and 4% from a manager.

The report provides an interesting insight into how employees feel about the psychological contract between employer and employee. Overall, the results appear to indicate that there are likely not significant differences for employees with some protected characteristics.

However, it is important to reflect that people with different protected characteristics may give more weight to different aspects of the “deal” dependent on their needs and experiences, and scores for people with “protected characteristics”, may also be reflective of other factors such as pay and reward, or position within the organisation.

The survey results may help to pinpoint in future where particular groups of employees feel they may be experiencing the impact of bias, but generally, the results would likely not indicate structural/unconscious bias against employees with protected characteristics, particularly where “balance of the deal” score was in line with the overall organisational result.

It is noted that both full and part-time employees scored **-14** for the “balance of the deal” as did managers and non-managers.

Are employees with protected characteristics are more or less likely to raise grievances, and whether a grievance is more or less likely to be resolved informally/at stage 1, stage 2/formal hearings, or be subject to appeal or result in formal hearings?

The numbers of formal grievances raised by employees are low in comparison to the size of the workforce and have been steadily declining since 2018/19.

In December 2020, **16** grievances were recorded for the year, down from 30 in 2018/19. This decline may be because of increased opportunities for flexible/home working, but it should be noted that in 2019/20 only 7 grievances were recorded, so this decline should not immediately be assumed to be as a result of an increase in remote working.

Because the numbers of grievances are so small it is difficult to make statistical inferences about trends year on year.

It is noted that **89%** of grievances over the 3-year period (2018 – 2020) were raised by female employees. It is recognised that the Council workforce is predominately female.

It is noted that **75%** of grievances in this period were raised by White British employees. 7.5% were for “Other” employees and ethnicity was unknown for the remainder.

It is noted that **28%** of grievances were raised by employees aged 50-59 years, with **24%** raised by employees aged 40-49 years and **22%** raised by employees aged 30-39 years. This is suggestive that older employees may feel more confident or experienced to raise concerns formally. No grievances were raised by employees aged 15-19 years in the period.

68% of grievances were raised by employees who stated they did not have a disability, with **30%** being raised by employees whose self-defined disability status was unknown.

There is no data available to identify how many grievances were upheld in the period.

This data suggests overall that older female employees are more likely to raise formal grievances.

Are employees with protected characteristics over or under-represented in bullying and harassment complaints?

It has been deemed likely that any formal bullying and harassment complaints are dealt with through the Council’s grievance procedure and are flagged up to be dealt

with as such by HR Direct. HR have identified that there have been very few bullying and harassment cases in recent years.²²

The Council does not publish or collate data about the reasons for employee grievances and it is noted that due to there likely being very small numbers of such complaints, any such data could potentially identify individual employees.

It is noted that monitoring the reasons driving grievances could be potentially complex because an employee may state multiple issues/concerns in their grievance including bullying, harassment and/or discrimination.

Formal grievances are managed on a case-by-case basis by the responsible manager with support from HR's Advice & Consultancy Team. If bullying and harassment is evidenced as having taken place, it should be noted that this could be seen as a disciplinary issue as well.

The Council states it has a zero-tolerance approach to bullying and harassment of employees. The Council's Bullying and Harassment policy states that "employees are encouraged to discuss their concerns informally with the person concerned as early as possible with the aim to provide an opportunity for the person to recognise and change their behaviour"²³. The policy acknowledges that this may not be appropriate in some circumstances and thus signposts employees to raise complaints in writing to appropriate senior manager. If a proportion of bullying and harassment complaints are being addressed at informal stages (for example through mediation) then it would be very difficult to identify or monitor such complaints.

The TUC survey of safety representatives published in 2018, "showed 45% of safety representatives listed it as one of their top five workplace concerns. Overall, it was the second biggest workplace issue after stress. Bullying/harassment was worst in local and central government, (cited by, respectively, 80% and 71% of respondents from those sectors)."²⁴

The Chartered Institute of Professional Development – UK Working Lives reported stated with respect to relationships at work "Three in ten workers report at least one form of bullying or harassment in the workplace in the last 12 months. For one in seven workers, a case remains unresolved. Forms of conflict at work differ in particular by gender. Women record more cases of being undermined or humiliated and unwanted sexual attention or harassment, and men report more physical threats and false allegations. We also note differences according to race and sexual orientation or gender identity, with BAME and LGBT+ workers more likely to face discrimination or being undermined or humiliated."²⁵

This national evidence should be considered as a key driver for further exploration of Council employees experiences of bullying and harassment, although it is noted that in the employee satisfaction survey (2021) **83%** of employees stated that they had

²² HR Advice and Consultancy

²³ Bullying and Harassment Policy P308

²⁴ [Bullying at Work | TUC](#)

²⁵ [uk-working-lives-summary-2019-v1_tcm18-58584.pdf \(cipd.co.uk\)](#)

not experienced such behaviour in the past 12 months. It should be considered that the percentages of the workforce who stated they had experienced bullying from a colleague or manager, could equate to around 300 employees in the workforce if representative of the views of all employees.

On the basis of the available evidence, it is currently not possible to identify whether Council employees with protected characteristics are more or less likely to experience bullying and/or harassment.

Are employees with protected characteristics more or less likely to be subject to formal disciplinary proceedings?

The numbers of formal disciplinaries recorded are low in comparison to the size of the workforce and have been declining since 2018/19. As of December 2020, only **10** disciplinaries were recorded, down from **43** in 2018/19.

61% of disciplinaries from 2018/19 – 2020 were for female employees, and **79%** were for White British employees. Ethnicity was unknown for the remainder bar 2 which were for “Other” employees. As with grievances, older employees were more likely to be involved in disciplinaries with **31%** involving employees aged 50-59 years.

Are employees with protected characteristics are more or less likely to leave the organisation, and what reasons are expressed for this?

Voluntary leavers

Analysis of leavers and movers in March 2021²⁶ identified that **82%** of all employees leaving the Council in 2019/20 left voluntarily. **26%** of voluntary leavers left within 1 year of service and 12% had 1-2 years of service.

8% of voluntary leavers were 24 years and younger in comparison to 4% of all Council employees.

70% were from Social Care/Business Support. Employees in lower pay grades (A-I = **67%**) were also more identified as being more likely to leave.

The report noted that part-time employees were 50% more likely to leave.

It should be considered, based on the findings in this report, that an overwhelming majority of part-time employees in the Council are female, and therefore it can likely be extrapolated that younger female part-time employees may be more likely to voluntarily leave the Council than other groups.

²⁶ HR Strategic organisational development

It should also be noted with caution that a significant proportion of ethnic minority employees sit within Social Care so the leavers dataset should be interrogated to identify whether voluntary leavers are more likely to be from ethnic minority employee groups.

Dismissals

Of all dismissals from the Council in 2020 (it is noted that dismissals are not necessarily as a result of a formal disciplinary processes, and it must be acknowledged that the datasets for disciplinaries and dismissals do not correlate) **62%** were female in comparison to **37%** of males. Again, the predominance of females in the workforce should be noted as a potential driver for this, and there has been no real change in proportions of male and female dismissals from 2018/19.

Only **2%** of all dismissed employees were identified as being non-White British in 2020. This would not indicate any structural/unconscious racial bias.

13% of all dismissed employees self-identified as having a disability in 2020. This should be noted as it does not appear to be proportionate in comparison to the percentage of the workforce who have defined themselves as having a disability. The percentage of dismissed employees who identified as having a disability has increased from **8.6%** in 2018/19. This bears further consideration as the drivers for these dismissals need to be understood to identify whether structural or unconscious bias is coming into play.

43% of all dismissed employees in 2020 were aged 50-64, a reduction from **55%** in 2018/19. **11%** of all dismissed employees in 2018/19 were aged 15-34. By comparison this increased to **30%** in 2020, suggesting that younger employees are more likely to be dismissed now.

Chapter 2: Lifelong outcomes for children & young people

Key line of enquiry (C) – Do children & young people with protected characteristics in Norfolk experience the same lifelong outcomes as people without these protected characteristics?

In this chapter, Children's Services data (including data from Early Help), youth justice data, data on educational attainment absence & exclusions, young people not in education, employment or training (NEET) and young people in apprenticeships were all reviewed. It is noted below where there were gaps in these datasets. This was because data was not available (not published), or because it was not available at the aggregated local level.

In Norfolk in 2019, at **EYFS** pupils performed in line with national achievement rates at. At **KS2** National achievement rate for pupils reaching the Expected Standard in Read, Writing and Maths was 64% but was lower in Norfolk at 60%. At **KS4** achievement rates in Norfolk (45.3%) for Attainment 8 were in line with national rates. 63% of all pupils in Norfolk achieved grades 9-4 GCSEs in English & Maths in comparison to the national achievement rate for state-funded schools at 64.6%.

In 2019 in Norfolk, the A level APS was 31.18 in comparison to 33.58 in the UK. In Norfolk at KS5 student numbers have grown ahead of national trends and A level performance has improved since 2017, with around 3500 students entered for at least 1 A level. Again, it must be noted that less data is available about post-16 education outcomes for diverse ethnic minority young people in Norfolk.

The percentage of young people aged 16-18 in full-time education increased in Norfolk from 2020 to 2021. Percentages of NEET young people in Norfolk has not changed significantly since 2018 (sitting at around 4%). The numbers of young people in apprenticeships (aged 16-17 years) in Norfolk fell from 2020 to 2021.

Nationally it has been recognised that Black children are more likely to become "Looked After" than White children and Asian children in comparison to the under 18 populations in the UK, and this appears to be the case in Norfolk as well.

In the past 12 months, Children's Services has undertaken a significant amount of data analysis with respect to children and young people's ethnicity, and in 2020 the Service established an Anti-Racist Practice Group as a result of identifying gaps in ethnicity monitoring data, and because it appeared that children from specific ethnic groups were likely to be over-represented in certain cohorts. As a result, ethnicity monitoring data collection has improved, with targets being set and progress monitored by responsible managers. Additionally, an action plan has been developed to enable managers and practitioners to support children & young people more effectively.

It is also recognised that Black children are more likely to be issued with cautions and sentenced in youth justice nationally than other ethnic groups. Again, this

appears to be true in Norfolk, although the numbers of children in this cohort are small and therefore statistical inferences must be treated cautiously. 57% of the young people sentenced or cautioned in Norfolk in 2019/20 were white boys, aged 15-17 years.

Are young people with protected characteristics in Norfolk are more or less likely to achieve the expected standard of attainment/achievement at EYFS, KS2 and KS4?

In **2018** it was reported²⁷: “At EYFS, KS2 and KS4, the proportion of children with a Black heritage who achieve the expected standard is well below the Norfolk average, and for children from a Gypsy or Roma background the proportion is significantly below the Norfolk average. At EYFS, KS2 and KS4, the level of achievement is significantly below the Norfolk average for the vast majority of Norfolk’s SEN children.”

Due to the national COVID-19 pandemic response, the government is not planning on releasing educational attainment data for 2020-21 or 2021-22. This is because of significant changes to the way pupil assessments were undertaken during the pandemic.²⁸ Attainment data from these years will not be comparable with previous years to measure progress or for benchmarking in future.

It has also been reported that there will likely be further changes to assessment frameworks. Therefore, it may be some years before the impact of the pandemic on national, regional and local attainment/standards is fully understood. Monitoring of post-16 destinations will therefore likely be a useful indicator of how the pandemic has impacted on educational attainment for young people, going in forward

While there will likely be challenges in monitoring progress, as a result of the government’s decision to not release data, it has been reported by the Learning and Achievement Team that they have excellent relationships with all schools in Norfolk and have therefore been able to obtain full data on absences, exclusions and headline GCSE results for 2020.

In 2017, qualifications taken at the end of Key Stage 4 were reformed with new numeric grading scales from 0-9 introduced. GCSEs were reformed and the DfE removed many vocational qualifications from performance measures. Therefore, outcomes from 2018 onwards are not comparable with previous years. In Norfolk it was reported that the overall proportion of pupils achieving a standard and/or strong pass in English and Maths in 2019 was very similar to 2017 and 2018.

The Norfolk Learning Board was established in 2021, to bring together representatives of educational establishments along with experts from within the Council to develop strategies to improve educational outcomes across Norfolk. This

²⁷ Lifelong outcomes of Black, Asian and minority ethnic people and disabled people in Norfolk – NCC Intelligence and Analytics Team 2018 (2016/17 educational attainment data)

²⁸ [DfE announcements regarding the release of attainment data](#)

is being chaired by the Assistant Director – Education in the interim until an independent Chair is decided on.

The below analysis regarding differential educational attainment for pupils with protected characteristics could therefore be used to inform the work of the Board.

It is noted that around 50% of primary schools in Norfolk are academies and there is only one LA maintained secondary school in Norfolk. This is important as academies are independent to the Council.

Educational attainment – gender

The below data has been taken from the “Validated Attainment and Pupil Characteristics figures – 2020”.²⁹

Data is only available for male/female attainment, as a result of statutory reporting mechanisms.

The below data shows that boys generally perform less well than girls at key stages (which is in line with national data), and it is important to reflect that there may be structural and unconscious biases coming into play throughout the education system. This is something that is already widely recognised.

Early Years Foundation Stage (EYFS) – gender

In Norfolk in 2019, 73% of pupils achieved a good level of development at EYFS. At this stage, pupils in Norfolk performed slightly better than nationally (72%).

The achievement rate in Norfolk, for boys was **66%** for in comparison to **88%** for girls.

The achievement rate for boys eligible for free school meals (a key indicator of deprivation) was **47%** in comparison to **63%** for girls.

In the Year 1 Phonics Assessment in Norfolk, girls performed better with **83%** achieving the required standard in comparison to **76%** of boys.

Key Stage 2 (KS2) – gender

In Norfolk in 2019, 60% of all pupils achieved the Expected Standard (in reading, writing & maths). At this stage pupils in Norfolk performed slightly worse than nationally (64%).

The achievement rate in Norfolk for boys was **55%** in comparison to **64%** for girls.

Disadvantaged boys performed worse (45%) than girls across the three subjects (50%), although they performed better in Maths (64%) than girls (61%).

Key Stage 4 (KS4) – gender

In Norfolk in 2019, 45.3% of all pupils achieved the standard at Attainment 8 (the achievement of a pupil across 8 qualifications including mathematics and English). This was in line with 44.7% nationally.

²⁹ Supplied by the Learning & Achievement Service

The achievement for boys was **42.8%** in comparison to **47.8%** for girls.

As at other key stages, disadvantaged pupils in Norfolk performed less well, with disadvantaged boys at (32.4%) and girls (38.2%).

63% of all pupils in Norfolk achieved GCSEs in English & Maths at grades 9-4 in 2019. This compares to the national achievement rate for state-funded schools of 64.6%.

The achievement for boys in Norfolk was **59%** in comparison to **67%** for girls.

Disadvantaged pupils in Norfolk performed less well at this level, with **38%** of boys achieving these GCSEs in comparison to **48%** of girls achieving at this level. The national rate for all disadvantaged pupils was 44.7%.

Educational attainment – SEN/EHCP pupils

The DfE national dataset³⁰ identified that in the UK in 2020/21, **12.2%** of pupils in were classified as Special Educational Need (SEN) and **3.7%** of pupils are on Educational Health Care Plan (EHCP). Older 2018 data shows that 15.6% of Norfolk children and young people were identified to have SEN and this trend has remained stable for around 3 years. 80% of SEN pupils are supported in mainstream schools with around 20% under an EHCP – around 3.1% of all Norfolk pupils. It is estimated that around 7.3% of Norfolk children and young people are disabled (around 13,000 children and young people). Around 66% of SEN children and young people are male.³¹

“SEN support” identifies pupils who have a plan in place with the school to support their identified special educational need. This may include support which will be provided in school for mental health, behaviour, specialist teaching (dyslexia), therapists (speech/language support)

“SEN-EHCP” identifies pupils who have been assessed as having SEN needs but require extra support beyond which the school can provide on its own. Outcomes cover education, health and social care, and there may be personal budgets allocated. EHCP pupils likely have higher or more complex needs than SEN pupils.

It is important to note that not all SEN pupils would necessarily self-identify as “disabled” although some would.

The 2019 dataset³² also reflects outcomes achieved through the Virtual Schools in Norfolk (which in some areas is very strong when compared to national results). It is noted that generally SEN Support and SEN EHCP pupils’ achievement rates are in keeping with national outcomes, although lower than Norfolk children’s achievement rates overall.

Again, it should be noted that the data does indicate that there may be structural biases impacting on SEN/EHCP pupils attainment rates, however these may not be

³⁰ [DfE - SEN Data](#)

³¹ [Norfolk Insight - JSNA C&YP with SEN 2019](#).

³² All 2018/19 data was supplied by the Learning & Achievement Service

the only drivers of poorer outcomes, and further analysis and exploration would be needed to fully understand causal factors.

EYFS – SEN/EHCP

In Norfolk in 2019, 73% of pupils achieved a good level of development at EYFS.

77% of non-SEN pupils achieved this level, in comparison to **34%** of SEN Support pupils and **9%** of SEN EHCP pupils.

Norfolk pupils performed better than SEN Support pupils (29%) and SEN-EHCP pupils (5%) nationally

KS2 – SEN/EHCP

In Norfolk in 2019, 60% of pupils achieved the Expected Standard in reading, writing and maths.

69% of non-SEN pupils achieved this level in comparison to **22%** of SEN Support pupils and **9%** of SEN EHCP pupils.

Norfolk pupils performed slightly worse than SEN Support pupils nationally (25%) but at the same level as SEN-EHCP pupils (9%).

KS4 – SEN/EHCP

In Norfolk in 2019, 45.3% of pupils achieved the standard at Attainment 8 (an average of GCSE scores). 48% of non-SEN pupils achieved this level in comparison to **33.5%** of SEN pupils and **15%** of EHCP pupils.

33.2% of SEN Support pupils and 12% of SEN-EHCP pupils achieved GCSEs in English & Maths at grades 9-4. This is in line with national achievement rates for SEN Support pupils (32.3%) and SEN-EHCP pupils (11%).

Educational attainment – ethnicity

Much of the below data has been taken from the Annual Standards Report 2019³³, which provides the most recent analysis of educational attainment in Norfolk. This report puts all ethnic minority pupils into one cohort (under the category of “BAME”) so where possible, further narrative analysis has been added from other sources.

In Norfolk in 2018, **15.6%** of pupils were identified as being from an ethnic minority background in primary schools (33.9% nationally). **13.8%** of pupils in secondary schools were from an ethnic minority background (32.3% nationally). It is noted that this data gives an indication that the ethnic minority population in Norfolk may be larger than has been estimated in other datasets. Around **0.3%** of children aged 17 years and under attending school in Norfolk were from Gypsy/Roma/Irish Traveller groups in 2018.³⁴

Where there are disparities in achievement for particular ethnic minority pupils, this is something that is reflected in national research/data findings. It is important to note

³³ Produced by the Education Achievement Service

³⁴ NCC Spring 2018 School Census

that structural/unconscious bias may be a factor in driving attainment outcomes for some ethnic groups. Further research is required to understand why some diverse ethnic pupil groups consistently perform better or worse than others. Understanding why in Norfolk some pupil groups achieve significantly better outcomes would also be useful in addressing identified persistent inequalities.

EYFS – ethnicity

In 2019, the percentage of BAME pupils achieving a good level of development at EYFS was below the attainment level of White-British pupils in Norfolk. **74%** of White British pupils achieved this level of development, in comparison to **67%** of BAME pupils. There has been an improvement in BAME pupils' attainment overall in Norfolk since 2017, but it is lower than national achievement rates (70% of BAME pupils).³⁵

In Norfolk in 2019³⁶:

- **81%** of pupils from a Mixed/Dual background achieved a good level of development
- **76%** of pupils from a Black/Black British background
- **70%** of pupils from an Asian/Asian British background
- **70%** of pupils from Any other ethnic group achieved a good level of development

Within the Asian/Asian British pupil group, Bangladeshi (52%) and Pakistani (54%) pupil achievement rates were noticeably lower.

Black/Black British pupils achievement rate at this level has improved significantly from 61.6% in 2017³⁷ however in 2019 Black Caribbean pupils' achievement at this level was 40% in 2019³⁸ (falling from 58.3% in 2016/17).³⁹

38% of Gypsy/Roma Children achieved this level of development in Norfolk⁴⁰. Data was not available for Travellers of Irish heritage (likely because of small numbers of pupils in this cohort). The achievement level for Gypsy/Roma children appears to have improved from 36.8% in 2016/17.

In Phonics assessments at the end of Year 1, BAME pupils in Norfolk were slightly less likely (78.4%) to achieve the expected level, in comparison to White-British pupils (79.9%).⁴¹

KS2 – ethnicity

In 2019, a lower proportion of BAME pupils achieved the Expected standard (in reading, writing and maths), compared to White British pupils in Norfolk. This gap

³⁵ Annual Standards Report 2019

³⁶ January 2020 GRT children: Data review and analysis – produced by NCC Intelligence & Analytics Team and Education Achievement Service

³⁷ Lifelong outcomes of BAME and Disabled people in Norfolk 2018 (attainment data 2016/17)

³⁸ January 2020 GRT children:

³⁹ Lifelong outcomes of BAME and Disabled people in Norfolk 2018 (attainment data 2016/17)

⁴⁰ January 2020 GRT children

⁴¹ Annual Standards Report 2019

has closed since 2016/17. **60%** of White-British pupils achieved the Expected standard in 2019 (compared to 64.8% nationally) in comparison to **58.1%** of BAME pupils (compared to 65.4% nationally).⁴²

In Norfolk in 2019 in terms of achieving the expected Standard ⁴³

- **77%** of pupils from an Asian/Asian British background achieved the standard
- **61%** of pupils from a Mixed/Dual background achieved the standard
- **55%** of pupils from a Black/Black British background achieved the standard

Asian/Asian British pupils' achievement levels improved from 2016/17 (70% to 77%) as did Black/Black British pupils (37% to 55%).

Within Asian/Asian British pupil group Pakistani pupils' achievement rates were noticeably lower (57%).

Black Caribbean pupils' achievement was unknown due to the small size of the pupil cohort.

21% of Gypsy/Roma pupils achieved the expected standard at EYFS in Norfolk in 2019.⁴⁴ Data was not available for Travellers of Irish heritage as a result of the small numbers of pupils in this cohort.

KS4 – ethnicity

In Norfolk 2019, the achievement level of BAME pupils (**41.1%**) was slightly higher than for White British pupils (**39.9%**) but slightly below the national average (45.4%) at grades 9-5 in English & Maths.⁴⁵ The standard at this level in Norfolk improved for all pupils from 2016/17.

In Norfolk in 2019, **46.8%** of BAME pupils in Norfolk achieved the Attainment 8 standard, in comparison to **45.1%** of White British pupils. This compares to 46.7% of all pupils nationally.⁴⁶

Nationally pupils from Mixed, Asian and Chinese groups all performed better against this measure than White pupils (46.1%), with the exception of Black pupils who performed slightly worse (44.9%)⁴⁷

In Norfolk in 2019, in terms of achieving a 9-4 pass in English & Maths⁴⁸

- 92% of Chinese pupils achieved this outcome
- 76% of Asian/Asian British pupils achieved this outcome
- 63% of Mixed/Dual background pupils and 63% of White pupils achieved this outcome
- 61% of Black/Black British pupils achieved this

⁴² Annual Standards Report 2019

⁴³ January 2020 GRT children

⁴⁴ January 2020 GRT children

⁴⁵ Annual Standards Report 2019

⁴⁶ Annual Standards Report 2019

⁴⁷ [National KS4 Performance Headlines 2019](#)

⁴⁸ January 2020 GRT children

In 2019, **40%** of Irish Travellers pupils in Norfolk achieved a 9-4 pass in English & Maths in Norfolk and **63%** of Gypsy Roma pupils achieved this outcome. This is noted to be a significant improvement on previous achievement rates and significantly better than national achievement rates (12.5% for Irish Traveller pupils and 18.9% for Gypsy Roma pupils)

It is noted that Irish Traveller pupils and pupils from “Any other black background” (39%) achieved the lowest percentage of passes at this level.⁴⁹

Are young people with protected characteristics more or less likely to be absent from school, have fixed period exclusions or absenteeism?

Absence from school – gender

In 2019 in Norfolk, in primary school the overall absence rate was 4.3 (3.9 nationally). In secondary school the overall absence rate was 5.8 (5.2 nationally).⁵⁰

Boys (4.4) were more likely to be absent than girls (4.2) in primary school. In secondary schools, girls (6.2) were more likely to be absent than boys (5.9).

Absence from school – SEN/EHCP

Pupils with SEN Support (8.3) were considerably more likely than non-SEN (5.6) children to be absent from secondary school in 2019. The rates of SEN-EHCP (9.9) were the highest of all pupil groups (and higher than the national rate of 8.1 for SEN EHCP).

Absence from school – ethnicity

In 2019, there were only marginal differences in overall absence rates for White-British (5.08) and BAME pupils (5.02) in Norfolk.

BAME pupils’ overall absence rates decreased from 2017, while overall absence rates for White-British pupils have increased slightly in the same period.

Persistent absence rates have followed a similar pattern. In Norfolk, BAME pupils are only slightly more likely to be persistently absent (11.97) in comparison to White British pupils (11.62). Rates of persistent absence for BAME pupils have decreased and have increased for White British pupils.⁵¹

In secondary schools, children with English as an Additional Language were less likely to be absent from schools than non-EAL children in 2019.

In 2017/18 Norfolk pupils with Irish Traveller heritage and those from Gypsy/Roma backgrounds were found to most likely to be absent from primary and secondary

⁴⁹ January 2020 GRT children

⁵⁰ 2019 Validated Attainment & 2020 Pupil Characteristics

⁵¹ Annual Standards Report 2019

school, with significantly higher absence levels overall at this time.⁵² This has not changed since 2015/16

Fixed term exclusions – gender/SEN/EHCP

These increased for all pupil groups in Norfolk and nationally in 2019. Data on fixed term exclusions is not available by gender, or for the SEN Support or SEN EHCP cohorts.

Fixed term exclusions – ethnicity

In 2019 in Norfolk, BAME pupils continued to have lower rates of fixed term exclusions than White British pupils although this gap narrowed in the period.

BAME pupils experiencing fixed term exclusions increased from 3.73% in 2017 to **6.07%** in 2019. By comparison White-British pupils experiencing fixed term exclusions increased from 4.82% in 2017 to **6.63%**.⁵³

The fixed term exclusion rate for BAME pupils in Norfolk was significantly higher than the national rate of 3.91%.⁵⁴

According to 2017/18 data, pupils with Irish Traveller Heritage had the highest rates of fixed period exclusions in primary education in Norfolk (29%). In secondary education Gypsy/Roma pupils had the highest level of fixed period exclusions (53.4%). This has not changed since 2015/2016.⁵⁵

Permanent exclusions – gender

In 2019 in Norfolk, the permanent exclusion rate overall in Norfolk was 0.07%. Boys (0.12%) in Norfolk were more likely to be permanently excluded overall than girls (0.02%) and this pattern has not changed since 2017.⁵⁶

Permanent exclusions – SEN/EHCP

SEN-EHCP (0.75%) and SEN Support pupils (0.33%) were the cohort most likely to experience permanent exclusion from school overall in Norfolk in 2019, and this pattern has not changed since 2017.⁵⁷

Permanent exclusions - ethnicity

0.19% of White-British pupils in Norfolk were permanently excluded in 2019 in comparison to 0.13% of BAME pupils. It is noted that the rates of permanent exclusions for BAME pupils decreased since 2017 (from 0.14%).⁵⁸

⁵² January 2020 GRT children

⁵³ Annual Standards Report 2019

⁵⁴ Annual Standards Report 2019

⁵⁵ January 2020 GRT children

⁵⁶ Educational Attainment/Absence & Exclusions Dataset 2015 - 2019

⁵⁷ Educational Attainment/Absence & Exclusions Dataset 2015 - 2019

⁵⁸ Annual Standards Report 2019

In 2017/18 pupils from a mixed White/Black African background had the highest rate of permanent exclusion (0.6%) in primary education by ethnicity. This has not changed from 2015/16.

Pupils from Gypsy or Roma backgrounds had the highest rate of permanent exclusion in secondary education (3.4%) in Norfolk. Overall, the pupils most likely to be excluded from school in Norfolk in any ethnic group in 2018 were pupils from Gypsy/Roma backgrounds, and exclusions for these pupils were higher than the national rates of exclusion for this group (1%)⁵⁹.

Are young people with protected characteristics more or less likely to not be in education, employment or training (NEET)?

The percentage of young people who are not in employment, education and training (NEET) overall in Norfolk has not changed significantly since 2018, sitting at around 4%.⁶⁰ It is noted that the percentages of young people in full-time education increased in Norfolk from 2020 to 2021 overall.

Full time education or NEET – EHCP young people

In 2021 in Norfolk⁶¹, 85% of EHCP SEN young people (aged 16-17 whose destination was known) were in full time education in comparison to 90.2% of all Norfolk young people. 11% of EHCP SEN young people were NEET in comparison to 4.5% of all Norfolk young people.

This has been identified as an area of focused intervention by the Participation & Transition Strategy Team, who have also identified that SEN Support young people are more likely to become NEET as well.

Full time education or NEET – ethnicity

In 2021 in Norfolk⁶², 100% of Asian/Asian British young people and of Arabic young people were in full time education and 98% of Chinese young people in comparison to:

- 94% of young people from White/Asian backgrounds
- 93% of young people from Other ethnic backgrounds
- 92% of Black/African young people
- 91% of young people from White/Black African backgrounds
- 86% of Bangladeshi young people
- 84.9% of White young people
- 80% of Black/Caribbean young people.

⁵⁹ January 2020 GRT children

⁶⁰ Lifelong outcomes of BAME people and Disabled People in Norfolk 2018

⁶¹ EHCP data 2020-21 – produced by Participation & Transition Strategy Team

⁶² Ethnicity data 2020-21 – produced by Participation & Transition Strategy Team

In March 2021, no Chinese young people and only 2% of young people from White/Asian backgrounds were NEET in comparison to

- 4% of young people from White/Black African backgrounds (increase from 1.4% in 2020)
- 4.5% of White young people
- 6% of young people from White/Black Caribbean backgrounds (increase from 0% in 2020)
- 8% of young people from Other Black backgrounds
- 13% of Pakistani young people (increase from 0% in 2020)

No data is available to identify the % of Gypsy/Roma/Irish Travellers or Black/Caribbean young people who are NEET. It is noted that this group were identified to be at greater risk of being NEET in 2018, and it should be considered that destinations may be unknown for a greater proportion of this cohort than any other ethnic group because of their higher rates of absence in secondary education.

Full time education or NEET – Care Leavers

The Bright Spots Survey 2020 identified that of Norfolk Care Leavers surveyed to, 44% of respondents were not in education, employment, or training.⁶³

A Levels

In 2018/19 in the UK, the A level APS (average attainment score) was **33.58** for non-disadvantaged students aged 16-19.⁶⁴ In Norfolk in 2019 the A level APS was **31.18**.⁶⁵

It is noted that currently there is only provisional data for Norfolk in 2018/19 which looks at outcomes and destinations for students and educational establishments. Because much of the data is not available here at Norfolk level, it is not possible to say whether biases are coming into play at this level. It is important to reflect that while national outcomes may not necessarily reflect the Norfolk picture, they may provide a starting point for identifying what may be happening locally.

It is reported that in Norfolk at Key Stage 5 (16-18 years level 2-3 qualifications) student numbers have grown ahead of the national trend (by 4%) and A level performance in Norfolk generally has improved overall from 2017 to 2019. Around 3,500 students were entered for at least 1 A levels in the 2019 academic year.

⁶³ Bright Spots Survey 2020 – Summary Report

⁶⁴ [UK A level and other 16-18 results 2018/19](#)

⁶⁵ Attainment Outcomes for Norfolk for 2018-19 (provisional) end of KS5 – supplied by the Learning & Achievement Service

A Levels – gender

In 2018/19 in the UK, female students achieved a higher APS per entry (34.58 female and 33.31 male), but a higher proportion of male students achieved top grades of AAB+ (15.2% females and 18.1% of males).

In 2018/19 in Norfolk the APS for female students at A level was 32.5 and for males it was 30.64.

In Norfolk, 16.3% of female students achieved AAB+ grades in comparison to 15.9% of males, indicating that female students in Norfolk perform better than nationally, and better than male students locally.

A Levels – SEN students

In 2018/19 in the UK, students with SEN achieved an APS score of 30.7 in comparison to 33 for those with no identified SEN, and 39.7 for those whose SEN status was unknown.⁶⁶

APS scores are not available for Norfolk SEN students.

What is known is that SEN students in Norfolk in 2019 were less likely to progress to Higher Education than SEN students nationally (5% below the national rate) but were more likely to progress to Higher Education than non-SEN students in Norfolk.

34% of SEN students in Norfolk were progressing to Higher Education in comparison to 30% of non-SEN students.

Norfolk SEN students in 2019 were 4% behind Norfolk non-SEN students for sustained employment destinations, but 8% higher than national SEN students. In Norfolk 34% of SEN students were entering sustained employment, in comparison to 38% of non-SEN students. This compares with 26% of SEN students nationally.⁶⁷

A Levels – ethnicity

In the UK in 2018/19 Chinese students performed best overall at A level (across all measures). Black students had the lowest APS (around 27.0), and students whose ethnic group was unknown had the highest APS per entry level for A level (around 39.0).

It is noted that nationally attainment (at age 19 at level 3) for all ethnic groups fell in 2018/19 except for Chinese students. In this academic year, 54.6% of White students achieved outcomes at level 3 in comparison to 85.7% of Chinese students, 68.7% of Asian students, 64.2% of Black students and 59.1% of Mixed/Multiple

⁶⁶ [UK A level and other 16-18 results 2018/19](#)

⁶⁷ Attainment Outcomes for Norfolk for 2018-19 (provisional) at the end of KS5

ethnicity students. It is noted that attainment is better for all ethnic groups at level 2, with White students less likely to achieve than other ethnic groups.⁶⁸

APS scores are not available for ethnic groups in Norfolk; therefore, it is not possible to identify whether the attainment of students in Norfolk follow national trends.

Are young people with protected characteristics are more or less likely to take up and apprenticeship?

The numbers of young people in apprenticeships (aged 16-17 years) in Norfolk fell from 1085 in 2020 to 775 young in 2021.⁶⁹

Apprenticeships – ethnicity

90% identified as White British. 2.1% identified as White Other, and 6% had no ethnicity monitoring information available.

National DfE data suggests that in 2019/20 around 13% of apprenticeships in the UK were filled by BAME young people.⁷⁰

Are children and young people with protected characteristics more or less likely to be referred to Early Help?

Early Help systems have the capacity to collect and collate a significant amount of data about service-users “protected characteristics” however it is recognised that Early Help referrals are often escalated or de-escalated depending on whether the children referred are deemed by practitioners to meet the threshold for social work interventions. The collection of ethnicity monitoring data in Early Help appears to be less robust than in other areas of Children’s Services, but this has been recognised as an area for improvement.

A high proportion of Early Help referrals are dealt with at initial consultation, with advice and guidance given over the phone (including signposting to universal services - Tier 1/Tier 2⁷¹). Very little monitoring data is likely to be captured about children at this stage as often the referrals are for information only.

Children at Tier 3 will likely be allocated to a family practitioner where more robust data is collected, and these cases are now being included in targets for ethnicity monitoring data.

Where it is identified that there is a significant level of need (Tier 4) children are referred to the appropriate social work team and a case record is created on LCS, where self-defined ethnicity data is a required field and data capture is monitored by management.

⁶⁸ Level 3 attainment data – UK (19 years by ethnicity) supplied by Learning & Achievement Service

⁶⁹ Ethnicity data 2020-21 – produced by Participation & Transition Strategy Team

⁷⁰ [Apprenticeships: 'People from BAME backgrounds are not getting through' | Apprenticeships | The Guardian](#)

⁷¹ [NLCJB Threshold Descriptions](#)

It is noted that very little data is captured on either Early Help or LCS systems with respect to gender-identity, faith/belief and sexual orientation, although the fields exist on the system. This is often as a result of the young age of the child or because such information is captured qualitatively within notes to inform case-management. There are not statutory requirements for this data. While it is possible to interrogate data with respect to these protected characteristics the data will most likely not be complete.

In 2018, 95% of referrals to Early Help were deemed to be for White children and 5% for non-White children. At this time, this was deemed comparable to Norfolk's population estimates.⁷²

In 2021, slightly more than **10%** of contacts in Early Help were for children who defined as BAME in LCS, in comparison to over **80%** of children who defined as being White-British. Ethnicity was not recorded for around **7-8%** of referrals.⁷³ This dataset may not include initial contacts where only advice and guidance was given so there may have been more contacts about ethnic minority children than were shown.

A snapshot of Early Help from December 2020, showed there were no children identified in the system at this time from either an Asian or an Other ethnic group.⁷⁴

Given current school pupil population data indicates that around **15%** of pupils are likely from a diverse ethnic minority background, the current data could suggest that some ethnic minority children may be slightly under-represented, however this cannot be stated as a certainty, given that more ethnic minority children may have been referred to the Service than are currently known about.

Are young people with protected characteristics over or under-represented in LAC, Child Protection Plans and Children in Need cohorts?

A significant amount of work has taken place within Children's Services to improve their understanding of the experiences of ethnic minority children in LAC, CP and CIN cohorts.

In 2018, it was identified that in these cohorts there was likely "under-representation of children with a White heritage and an Asian heritage, and over representation of children with a Mixed heritage and with a Black heritage"⁷⁵

⁷² Lifelong outcomes of BAME people and Disabled People in Norfolk 2018

⁷³ Anti-Racist Practice Analysis – BAME Analysis 2021

⁷⁴ ChAT compared to pupils in LA Schools 02/12/2020

⁷⁵ Lifelong outcomes of BAME people and Disabled People in Norfolk 2018

According to the latest analysis of LCSID in 2021⁷⁶ 22% of children in Children's Services have self-identified as BAME, which figure would appear to be potentially disproportionately high in comparison to school population estimates.

BAME children and young people make up:

- 26.8% of care leavers
- 23.9% of LAC & CP cohort
- 22.9% of the Social Work Assessment cohort
- 19.4% of Child Protection cohort
- 18.8% of the Looked After Child cohort
- 18.1% of Open to Social Care

Of all BAME children and young people in the Service:

- 34% were from a White-Other background
- 12.6% were from Any Other ethnic group
- 8.7% were from Any Other Mixed background
- 8.6% were from a Black African background
- 5.9% were from Black – Other background
- 5.1% were from a White/Black Caribbean background.

Around 4% of children had no ethnicity data recorded. All other specific ethnic groups are at less than 4% for each group:

- 2.8% are from an Asian – Other background
- 1.2% are from White-Irish background
- 0.9% are from a Gypsy/Roma background
- 0.1% are from a Black Caribbean background.

The data has also been aggregated to District level. It is noted that in South Norfolk, BAME children (23%) in Children's services are distinctly over-represented in comparison to the local school population (16%).

Around 20% of BAME children in Children's Services are aged 16-17 years and 19% are aged 12-15 years.

A snapshot of the LAC cohort from December 2020⁷⁷ showed that 84% of the cohort was White in comparison to:

- 5.8% Black
- 5.7% Other
- 4.2% Mixed
- 0.6% was Asian.

⁷⁶ Anti-Racist Practice Analysis – BAME Analysis 2021

⁷⁷ ChAT compared to pupils in LA Schools 02/12/2020

At this point in time all ethnic minority groups in the cohort were over-represented (by around 3% in comparison to school population data) with the exception of the Asian group which was under-represented. This snapshot of the cohort also identified that at this point, 59% of Looked After children were boys.

The same snapshot shows a similar trend in the Child Protection and the Child in Need cohorts (although it is noted that in the Child Protection cohort at this time Asian children also appeared to be over-represented in comparison to the school population).

In 2019-2020 Norfolk offered places for a number of Unaccompanied Asylum Seeker Children (UASC) as Looked After Children, a majority of whom were over 12 years old. Of this group a number are now being transitioned as Care Leavers.

Based on the latest figures received⁷⁸ UASC could potentially account for 16.6% of BAME children in Children's Services.

It is known that around 50% of this cohort identified as being from Any other ethnic background and 27% identified as Black-African. Taking these children out of the equation, it would still indicate that BAME children were disproportionately over-represented in Children's Services (19% BAME children in comparison to 15% in Schools).

It is important to note that checks and balances are in place to ensure that all children in these cohorts are there for justifiable reasons. It is also noted that as part of the anti-racist practice action plan, an audit of ethnic minority children's cases has been undertaken to review how these have been managed.

Finally, it should be recognised that the Norfolk data around diverse ethnic minority children, is reflected in the national picture for Looked After Children. Published data from the DfE for March 2020⁷⁹ shows that in England:

- 69% of Looked After Children identified as White-British
- 10% identified as being from Mixed/Multiple backgrounds
- 7% identified as Black/Black British
- 4% identified as Asian/Asian British children
- 4% (for each group) identified as White-Other or Other ethnic background

Very small numbers of children from Irish Traveller or Gypsy/Roma backgrounds or Chinese children were identified in England as being Looked After in this period.

It is understood that in the UK in 2019 "White children were less likely to be in care (74%) and more likely to be adopted (83%) compared with their share of the population of all under-18-year-olds (79%) while. Black children were more likely to

⁷⁸ Children's Services – Quality & Transformation

⁷⁹ Children looked after in England including adoptions, Reporting Year 2020

be in care (8%) and less likely to be adopted (2%) compared with their share of the under-18-year-old population (5%). Asian children were less likely to be in care (4%) and less likely to be adopted (1%) compared with their share of the under-18-year-old population (10%)”⁸⁰.

Educational attainment data also showed that in 2019, 56% of primary-school aged Looked After Children in 2019 were classified SEN Support. Achievement rates for LAC children with SEN Support was lower at primary level in Norfolk although it should be noted that the numbers in this cohort were small⁸¹.

It is important to reflect that while structural/unconscious biases may be coming into play in shaping these data findings, there also needs to be a clear understanding of why children from particular backgrounds may be entering the system. There may also be other factors at play which means that these children and their families have needs which require structured interventions and targeted ongoing support. Exploring risk factors and looking at the effectiveness of early interventions by “protected characteristics” would be useful.

Are young people with protected characteristics likely to be over or under-represented in youth offending?

In 2018 it was reported that “there were 463 young people aged 10 to 17 in Norfolk’s Youth Justice System (YJS), with around 93% being White and the remaining seven per cent non-White, which is a higher rate than... in Norfolk’s general population (4.4% in the 2011 Census)...The ethnicity for around 62% of the NYOT cases... is recorded as White British, with around 30% being Any Other White Background... Overall, ethnicity data in the YJS for Norfolk shows an upward trend for those categorised BAME, although comparator data for the 10 to 17 population in Norfolk is outdated... therefore, caution should be used when drawing conclusions about disproportionality of the numbers of young BAME people involved in the YJS.”⁸²

Data is collected with respect to the ethnicity and gender of children within youth justice locally and nationally.

The latest nationally published data shows in 2019/20 in Norfolk, of the 303 children and young people sentenced or cautioned in the year⁸³:

- 87% were from “White” backgrounds (93% Norfolk Schools)
- 4.6% were of “Unknown” ethnic group
- 4.2% were from “Mixed” backgrounds (3%)
- 3.3% were from “Black” backgrounds (1%)
- 0.3% were from “Asian” backgrounds (2%)

⁸⁰ <https://www.ethnicity-facts-figures.service.gov.uk/health/social-care/adopted-and-looked-after-children/latest>

⁸¹ Validated LAC Achievement in 2019 Report – supplied by the Learning & Achievement Service.

⁸² Lifelong outcomes of BAME and disabled people in Norfolk - Norfolk Youth Offending Team Diversity Audit Report (April 2016 to March 2017)

⁸³ [Youth Justice statistics: 2019 to 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/youth-justice-statistics-2019-to-2020)

Norfolk's overall sentencing and caution rate per 10,000 people was 40.2 in comparison to 31.3 in the Eastern region.

While the number of young people in this cohort is small, it does show that children from Black and Mixed backgrounds appear to be over-represented in comparison to 2018 school population data. There were no children reported to be in the cohort from "Other" ethnic groups. It should be considered that Youth Justice ethnicity data may be aggregated differently to the school population data, and therefore comparisons should be treated cautiously. It should also be recognised that 2011 Census population estimates for ethnic minority children may be outdated

79% of the cohort were boys in comparison to 21% girls. "White" boys aged 15-17 years-old made up 57% of the cohort.

Nationally, Black children accounted for 17% of arrests, (7% higher than ten years ago). The proportions of youth cautions issued have decreased for White children and increased for Black children, while remaining broadly stable for Asian and Other children.

Across the country, all ethnic groups have seen decreases in the volume of youth cautions issued over the course of the decade. There was a smaller decrease for Black children when compared to other ethnic groups leading to an increase in the overall proportion of youth cautions issued to Black children (from 7% to 12% over the last decade).

In the year ending December 2019 nationally, boys comprised 83% of the total First Time Entrants, whilst making up 51% of the general 10-17 years-old population.

It is noted that the disproportionality of children and young people from diverse ethnic minority backgrounds is a key focus for inspections and the NYOT are required to produce an action plan to show how they will tackle issues locally. At the time of writing this report the latest Youth Offending Diversity Report was not yet ready for publication. This report includes an action plan to address identified inequalities as well as data findings with respect to all Youth Justice outcomes and services in Norfolk

The NYOT Diversity Audit Summary report states "The BAME data for Diversion interventions is slightly under-represented for the last four years, using the 2019/20 Public Health Schools Pupils BAME data of 7.5% as a comparison... The BAME Referral Order data for the last four years, in comparison to the Public Health School Pupil data, is under-represented. The NYOTs Youth Rehabilitation Order (YRO) BAME data is significantly higher than the Public Health School Pupil data for the last four years which would suggest BAME young people are over-represented when receiving YRO orders. The BAME data for Detention and Training/Custody Orders has fluctuated over the last four years but overall has shown an upward trend in

BAME young people. It should be noted that this dataset is small, and conclusions taken from a dataset this size should be done with caution.”⁸⁴

It was reported that there were small numbers of children from diverse ethnic minority backgrounds in custody locally and the NYOT has a clear focus on prevention and reducing re-offending, with this accounting for 50-60% of the Service’s activity.⁸⁵

It was reported that referrals from schools and from Early Help are critical to support NYOTs targeted work on prevention and diversion. It is noted that there is possibly under-representation of diverse ethnic minority children being referred in to Early Help, which may also mean that they are not being referred for support from the NYOT at the earliest opportunity. Again, exploring casual factors for entry into the youth justice system, alongside the impact/effectiveness of early intervention through multi-agency work would be useful to build on the narrative and improve understanding of what may be driving the data locally. Some of this information is likely already being captured through the NYOT Diversity Audit.

⁸⁴ Supplied by NYOT Summary findings from Diversity Audit 2019-2021

⁸⁵ Qualitative feedback from the NYOT

Chapter 3: Lifelong outcomes for adults

Key line of enquiry (D) - Do adults with protected characteristics in Norfolk experience the same lifelong outcomes as people without these protected characteristics?

There is only very limited employment data available to understand the experiences of diverse ethnic minority people in employment in Norfolk (note for the reader – this relates to Norfolk as a whole, not the Council, and is included as useful reference information). Again, this is because national source information is either missing or has not been aggregated to the local level.

In 2020 in Norfolk, 34.5% were qualified at NVQ4+ (degree level and above), lower than the UK rate at 43.1%. 7% of people in Norfolk had no qualifications, higher than the UK rate at 6.4%. It is important to reflect how little data is available about employment of people from diverse ethnic minority groups in Norfolk, because such data is not available from national sources.

The picture in terms of understanding health inequalities in Norfolk for people from diverse ethnic minority groups has likely not changed since 2018. It is noted that as of 2021, the gap in health inequalities data has been recognised locally, and steps are being taken by Public Health (working closely with partners including the voluntary and community sector) to develop a multi-agency health inequalities toolkit in Norfolk.

The COVID-19 pandemic has had and is likely to continue to have a substantial impact on people in Norfolk. It is now widely understood nationally that age, ethnicity, deprivation, underlying health conditions, employment (including occupations) and location have all been factors which have contributed to poorer outcomes for some groups.

As a result of having access to a significant amount of monitoring data about the spread of COVID-19 the Council has been able to demonstrate focused targeted interventions in recognition of the potential for some communities to be disproportionately impacted or at greater risk, including focused work to improve the uptake of vaccinations in deprived areas and in some ethnic minority communities in Norfolk.

The most recent Adult Services SALT data shows that some diverse ethnic minority people still do not appear to be accessing short-term support available. Monitoring of adults in receipt of long-term support has improved and shows that there has been an increase in some ethnic minority communities in receipt of services and support.

Are people with protected characteristics more or less likely to be employed, and where are they employed, (for example in managerial occupations or routine occupations)? Are people with protected characteristics more or less likely to be employed in particular occupations e.g., caring and leisure occupations or elementary occupations?

In 2020 in Norfolk, the economic activity rate was 81% for people aged 16-64 (in some form of employment). The employment rate for all people in Norfolk aged 16-64 was 76.4%⁸⁶ (75.1% nationally⁸⁷).

In 2020, the unemployment rate in Norfolk was 5.4%. Norfolk's overall unemployment rate is higher than in the Eastern region (3.8%) and in the UK (4.8%).⁸⁸

Of those who were employed:

- 23.8 % were in administrative/skilled trades occupations
- 17.9% were in professional occupations
- 11.3% were managers or senior officials
- 11% were in caring, leisure or service occupations
- 10.9% were in elementary occupations (labourers, general construction, cleaners etc)
- 4.7% were process plant/machine operatives

71.1% of those in employment (aged 16-64) were working full-time in comparison to 28.3% who worked part-time.

Of the 19.3% who were economically inactive in Norfolk:

- 28.2% were students
- 15.3% were looking after family/home
- 21.9% were long term sick
- 19.7% were retired (in comparison to 13.6% in the UK)

Of those who were economically inactive, 80.6% were deemed to not want a job.

Around 20% of Norfolk's economically active population are EA (Equality Act) core or work-limiting disabled (up from 14% in 2017). Around 46% of economically active people in Norfolk identified that they had a health condition or illness lasting 12+ months.⁸⁹

⁸⁶ NOMIS Labour Market Profile for Norfolk – Annual Population Survey December 2020

⁸⁷ [Employment in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

⁸⁸ Norfolk Insight – Norfolk Area Report

⁸⁹ APS - % EA core or work limited disabled 2020-12

Employment – age

In 2020 in Norfolk⁹⁰:

- 91.3% of people aged 25 to 34 years were economically active
- 87.8% of those aged 35-49 years were economically active
- 76.9% of those aged 50-64 years were economically active
- 39.9% of those aged 16-19 years were economically active
- 13.8% of those aged 65+ years were economically active

75% of those aged 25-49 years were working full-time. 62% of those aged 50+ years were working full-time, while 30% of those aged 16-19 years were working full-time.

Employment – gender

In 2020 in Norfolk, 83.7% of males were economically active. The employment rate for males was 78.3%. 6.4% of males were unemployed.

This compares with 77.8% of females in Norfolk who were economically active. The employment rate for females was 74.5%. 4.2% were unemployed.⁹¹

87.4% of males (aged 16-64) in Norfolk were in full-time employment in comparison to 54.4% of females.

In Norfolk, 30% of males in employment were in professional or associate professional and technical occupations while:⁹²

- 22% were in skilled trade occupations
- 13% were managers/senior officials
- 12% were in elementary occupations
- 10% were process plant/machine operatives
- 5% were in administrative/secretarial occupations
- 3% were in caring, leisure and other service occupations

This compares to 27% of females who were in professional or associate professional and technical occupations while:

- 20% were in caring, leisure and other service occupations
- 19% were in administrative/secretarial occupations
- 9.5% were managers/senior officials
- 10% were in elementary occupations
- 3.3% were in skilled trade occupations
- 1% were process plant/machine operatives

⁹⁰ APS – Dec 2020

⁹¹ Norfolk Insight – Norfolk Area Report

⁹² [Labour Market Profile - NOMIS - Official Labour Market Statistics Norfolk](#)

In Norfolk, the median hourly pay for male full-time employees was **£13.73** (£15.18 in UK) in comparison to female full-time employees at **£12.72** (£14.42 in UK)⁹³.

Employment – ethnicity

Only limited employment data is available from the Annual Population Survey about employment rates and types of occupations for people from different ethnic minority groups in Norfolk.

In 2018 it was reported that “In terms of ethnicity, most recent data shows that of Norfolk’s population aged 16 to 64, around 94.6% is of White ethnicity. The remaining 5.4% is non-White, made up of 1.2% Black, 0.9% Indian, 0.7% Pakistani/Bangladeshi, 0.6% Mixed heritage, and 2.0% from other ethnic groups. In terms of those who are economically active, the data for ethnicity is more limited ... it shows that 95.4% of Norfolk’s economically active 16- to 64-year-olds are White... 4.6% are from non-White ethnic backgrounds... around 76% of White people are employed and around 63% of those from an ethnic minority are employed”⁹⁴.

In 2020 the Norfolk the 16-64 years population was estimated to be 97% White, 1.5% “Other” ethnic group, 1% Indian/Pakistani/Bangladeshi and 0.5% Black/Black British.⁹⁵

In 2020 in Norfolk, the employment rate for ethnic minority people (aged 16-64) was 78.4%⁹⁶ This is higher than the overall employment rate for people in Norfolk at 76.4%. The ethnic minority employment rate in the UK is 66%.⁹⁷ Based on the 2018 report findings it would appear that there has been a significant improvement in ethnic minority employment rates since 2017.

In Norfolk in 2020⁹⁸:

- For the “White” group the employment rate was 76.5%
- For the “Mixed” group the employment rate was 64.3%
- For the “Indian” and “Other” group the employment rate was 100%
- Data was suppressed for “Pakistani/Bangladeshis” and “Black/Black British” because of the small sample size.

In Norfolk, 19.8% of ethnic minority people are economically inactive which is only very marginally higher than overall economic inactivity in Norfolk at 19.6%.⁹⁹

⁹³ [Labour Market Profile - NOMIS - Official Labour Market Statistics Norfolk](#)

⁹⁴ Lifelong outcomes of BAME and disabled people in Norfolk – 2018 (APS 2017)

⁹⁵ Annual Population Survey, Jan 2020 – December 2020

⁹⁶ Norfolk Insight – APS 16-64 employment rate – ethnic minority

⁹⁷ [Employment - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](#)

⁹⁸ APS Ethnic minority employment rates – December 2020

⁹⁹ Norfolk Insight - APS % ethnic minority aged 16-64 economically inactive

The 16+ unemployment rate for ethnic minority people is 5.2% in comparison to 5.4% for Norfolk overall.

Examining the available dataset on a regional basis, in the East of England (taking into account that much of the dataset is blank)¹⁰⁰.

- Black/Black British people are more likely to work in “human health and social work activities” than any other ethnic group
- Similar proportions of Black/Black British, Mixed and Asian-Other people are to be found working in “accommodation and food service activities”.
- Indian people are more likely to work in “information and communication” than any other ethnic group.

Are adults with protected characteristics more or less likely to achieve a higher-level qualification, or no qualification?

In 2020 in Norfolk, of people aged 16-64 years:¹⁰¹

- 34.5% were qualified at NVQ4 (degree level and above) and above (lower than the UK rate at 43.1%)
- 55.5% were qualified at NVQ3 and above
- 75% were qualified at NVQ2 (5 or more GCSEs graded 4-9) and above
- 88.3% were qualified at NVQ1 and above
- 4.7% of people had other qualifications
- 7% of people had no qualifications (higher than the UK rate at 6.4%)

Economic activity and qualifications – gender

In December 2020 in Norfolk, 7.8% of males aged 16-64 had no qualifications in comparison to 6.4% of females.¹⁰²

In Norfolk 5.4% of males with no qualifications were likely to be economically active (4.5% in the UK) in comparison to 4.1% of females with no qualifications (2.9% nationally).¹⁰³

This compares to an overall rate of employment in Norfolk of 6.1% of males and 3.9% of females.

¹⁰⁰ APS 2020 – Ethnicity by Industry

¹⁰¹ NOMIS Labour Market Profile for Norfolk, Jan 2020 – December 2020

¹⁰² APS 2020 – Norfolk Insight

¹⁰³ APS 2020 - % economically active with no qualifications

Economic activity and qualifications – ethnicity

In 2020 in the UK, 4.4% of White people with no qualifications were unemployed¹⁰⁴, in comparison to 1.9% of White people with level 4 qualifications.

By comparison the unemployment rate for people from diverse ethnic minority groups with no qualifications in the UK was:

- 8.7% of all people from a Mixed/Multiple ethnic group
- 7.7% of all Black/Black British people
- 4.8% of all Other than White ethnic group
- 3.8% of all Asian people
- 3.8% of all people from an Other ethnic group

In the UK, White 16-64 years olds were the least likely to be unemployed out of all ethnic groups (2%) regardless of their level of qualifications.

Comparable data does not appear to be available for ethnic minority people in Norfolk.

Are people with protected characteristics more or less likely to experience health inequalities?

The 2018 baseline report stated that “Health data by ethnicity at the sub-national level is very limited. However, the patterns of health inequality for people in BAME groups are likely to be similar locally as they are nationally, in terms of prevalence of risk factors that are known to be associated with conditions such as cancer, heart disease, respiratory disease, diabetes and poor mental health.”¹⁰⁵

Norfolk Insight¹⁰⁶ reports that in Norfolk in 2017, the life expectancy at birth for men (all ages) was **80.1** years (79.8 nationally) in comparison to **84.1** years (83.4) for women.

In 2018/19 in Norfolk, the mortality rate (preventable causes) for men was 231.5 per 100,000 (208.7 nationally) in comparison to 139.7 for women (133.3).

In 2018/19 in Norfolk, the excess winter death rate for males (aged 85+) was 24.2% (16.4% nationally) in comparison to 16.7% for women (19.4%).

In 2018/19 In Norfolk, 48.9% of children and young people were classified as being “physically active” (46.8% nationally).

¹⁰⁴ [Unemployment by qualification level - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://www.gov.uk/evidence/ethnicity-facts-and-figures)

¹⁰⁵ Lifelong outcomes of Black, Asian and minority ethnic people and disabled people in Norfolk – NCC Intelligence and Analytics Team 2018

¹⁰⁶ [Health and social care - Area reports - Norfolk Insight](#)

In 2019/20 33% of 10–11-year-olds were classified as overweight/obese (35.2%). 62.7% of adults were classified as being “overweight or obese” in Norfolk. (62.3% nationally) and 21.2% of adults were classified as being “physically inactive” in Norfolk (21.4% nationally).

It is noted that smoking prevalence in adults in Norfolk was in line with national figures at around 15%

It is likely that with respect to understanding potential health inequalities for people from diverse ethnic minority groups in Norfolk, this picture has not changed since 2018, and there is still only limited data available. As of 2021 this gap has been recognised, and steps are being taken by Public Health (working closely with partners including the voluntary and community sector) to develop a multi-agency health inequalities toolkit in Norfolk.¹⁰⁷

In 2019/20 in Norfolk, 24.1% of people (aged 16+ years) reported having a “high anxiety score” (21.9% nationally) and 9.2% of people reported a “low happiness score” (8.7% nationally).

In 2017 the suicide rate for men in Norfolk was 17.9 per 100,000 (15.5 nationally) in comparison to 4.7 for women (4.9).

In 2019/20 in Norfolk the rate of emergency admissions for self-harm was 115.6 per 100,000 for men (140.5 nationally) in comparison to 215.3 for women (243.7).

The 2017 national LGBT survey and action plan¹⁰⁸ (108,000 people) reported:

- 16% of survey respondents who accessed or tried to access public health services had a negative experience because of their sexual orientation, and at least 38% had a negative experience because of their gender identity.
- 51% of survey respondents who accessed or tried to access mental health services said they had to wait too long, 27% were worried, anxious or embarrassed about going and 16% said their GP was not supportive.
- 80% of trans respondents who accessed or tried to access gender identity clinics said it was not easy, with long waiting times the most common barrier.

The impact of COVID-19

It has become widely understood that age, ethnicity, deprivation, underlying health conditions, employment (including occupations) and location have all been factors which have contributed to poorer outcomes from COVID-19. The “Marmot review”¹⁰⁹ stated “COVID-19 has further revealed and amplified these inequalities in health, and there are clear socio-economic and ethnic inequalities in risk mortality from the disease. It is clear that the existing health situation in February 2020 is highly relevant to what has happened during the COVID-19 pandemic... differing risks are related to socioeconomic factors and area deprivation, occupational exposures,

¹⁰⁷ Public Health Prevention Policy Manager - April 2021

¹⁰⁸ [NHS England » LGBT health](#)

¹⁰⁹ Build Back Fairer: COVID-19 (2020)

living conditions, ethnicity, religion and previous health– itself closely related to socioeconomic status.”

This report also identifies that pandemic management will likely have long-term impact on widening inequalities for people from the most deprived communities, including people from some diverse ethnic minority communities, and not just in terms of health, but in education and employment as well.

The monitoring of the spread of COVID-19 has provided valuable insight into how existing health inequalities may have exacerbated outcomes for some groups of people.

Local data shows that Norfolk’s experience of the pandemic has been very similar to the emerging national picture. While there have been distinct differences at District level for testing data (by age, gender and ethnicity), overall, in Norfolk women have been more likely to test positive for the disease.

In 2020 in Norfolk between March and October¹¹⁰, of confirmed cases:

- 15% were for women aged 80+ years in comparison to 12% for men.
- 8% of confirmed cases were for women aged 30-39 years in comparison to 5% men.

The report also noted that a higher proportion of confirmed cases were for younger female health & care staff.

In the same period, Pillar 1 testing in Norfolk (swab testing in PHE labs and NHS hospitals for those with a clinical need, and health & care workers) showed 79% of positive tests were for people from a “White” background, while 6% of positive tests were for Asian/Asian British people and 1% were for Black/Black British people. Ethnicity was unknown for 12% of positive tests.

The same report identified that these figures would likely be disproportionate to the ethnic minority percentages for Norfolk’s overall population. The report also identified that these figures likely included a higher proportion of health & care workers. It is recognised that there is a higher prevalence of diverse ethnic minority people employed in health & care, in Norfolk.

Pillar 2 testing (swab testing for the wider population) showed 73% of positive tests were for “White” people, while 2% of positive tests were for Black/Black British people (21% ethnicity unknown). Again, the report noted that people from ethnic minority groups in Norfolk were likely over-represented in positive test rates

In Norfolk, COVID-19 incidence was seen to increase faster in the most deprived areas of Norfolk. Data for the period showed that North-Norfolk had consistently lower rates of transmission, despite having an older and potentially more vulnerable population.

Due to the higher prevalence of people with long term/limiting conditions in the county, Norfolk’s clinically extremely vulnerable population was **4.5%** (4% in

¹¹⁰ The Impact of COVID-19 in Norfolk March – October 2020 (Health & Wellbeing Board)

England). It is noted though that reports showed that the percentage of cases in care homes in Norfolk was lower than the national/regional average.

It is important to note that people with certain pre-existing health conditions have been seen to be at greater risk of death involving COVID-19 (particularly chronic heart disease and uncomplicated diabetes). Research shows that the prevalence of such conditions can be directly linked to certain groups by age, disability, gender and ethnicity.¹¹¹

Infection survey data from May 2020 to January 2021 showed that at district level, there were consistent spikes in community testing during peak transmission periods in all districts, with particular increases for people from specific ethnic groups (Black/Black British and Asian/Asian British) people.

Great Yarmouth saw the highest proportion of positive tests for Black/Black British people through the period while Norwich saw the highest proportion of tests for Asian people.¹¹²

It is important to note that all ethnic minority groups (male and female), other than Chinese people had a higher rate of mortality as a result of COVID-19 than White British people in the UK.¹¹³

As a result of having this data, the Council has been able to demonstrate focused targeted interventions in recognition of the potential for some communities to be disproportionately impacted or at greater risk. As an example, there has been focused work to improve the uptake of vaccinations in deprived areas and in some ethnic minority communities in Norfolk.

Adults in receipt of long-term support

The following analysis is of the Adult Services SALT data from 2019/20 and 2020/2021.¹¹⁴

In 2018 it was reported that “Ethnicity is recorded for the vast majority (99.8%) of those 12,000 Norfolk adults aged 18 and over receiving long-term support. Around 98.5% are recorded as White and the remaining 1.5% non-White, which is a lower rate than for those aged 18 and over in Norfolk’s general population (3% in the 2011 Census). It is reasonable to suggest that there is more ethnic diversity among Norfolk’s population since the Census, and therefore there is likely to be a greater degree of under-representation of people from BAME groups receiving long-term support, than the data suggests. It should be noted that numbers are low for people receiving long-term support within some specific ethnic groups, and for those with Gypsy or Irish Traveller heritage the numbers are extremely low.”¹¹⁵

¹¹¹ ONS report – July 2020

¹¹² Ethnic inequalities - Test and trace data analysis – ONS 2021

¹¹³ [Updating ethnic contrasts in deaths involving the coronavirus \(COVID-19\), England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/news-releases/2021/07/2021-07-20-ethnic-inequalities-test-and-trace-data-analysis)

¹¹⁴ Supplied by Strategy & Transformation (I&A)

¹¹⁵ Lifelong outcomes of BAME people and Disabled People in Norfolk 2018 – based on 2016/17 SALT data return

In 2019/20 ethnicity was recorded for **97.9%** of (11,000) Norfolk adults aged 18 and over receiving long-term support.

In 2020/21 ethnicity was recorded for **96.4%** of (11,474) Norfolk adults receiving long-term support.

Ethnic group	2019/20 %	2020/21 %
White British	93.4	92.3
Any Other – White	2.1	2.4
Undeclared/unknown	2.1	3.56
Asian/Asian British	0.46	0.42 (1.5 in Norfolk)
Mixed/Multiple	0.45	0.47 (1.2)
Black/Black British	0.37	0.40 (0.5)
Other	0.68	0.38 (0.3)

The Census estimates that the White population of Norfolk is around **96.5%**, therefore it may now be true that there is likely more representation of people from diverse ethnic minority groups in receipt of long-term support, albeit that some groups are still under-represented in long-term support (Mixed/Multiple ethnic groups and Asian/Asian British). It should however be noted that there is likely to be more ethnic diversity among Norfolk’s population since the Census (particularly taking into account school populations), therefore there may still be under-representation of all ethnic groups.

Gypsy/Irish Traveller service user numbers were extremely low for both 2019/20 and 2020/21 at 0.1% (under 10 service users).

In terms of the “primary support reason” for all clients:

Primary support reason	2019/20 %	2020/21 %
Physical support – personal care support	35.5	38.2
Learning disability support	21	21
Physical support – access and mobility only	16.8	15 (reduction from 18.4% in 2018/19)
Mental health support	12.3	12.5 (increase from 11.7% in 2018/19)
Support with memory and cognition	8.7	8.2
Support for social isolation/other	3.1	2.9
Sensory support – visual/hearing impairment	1.9	1.5

In 2019/2020 3 service users were identified as receiving Asylum Seeker support. In 2020/20 there were no service users identified as requiring this support.

The Sensory Support Unit maintains Norfolk’s “sight loss register” which identifies all people who have received a diagnosis of a permanent and substantial sight loss. Data from this register can be collated on request, but it has been reported that there

are around **6400** people on the register in Norfolk, with around 500 registrations per year¹¹⁶. The register includes data on age, gender and location.

Qualitative feedback from Sensory Support was that the pandemic created a backlog of assessments for newly diagnosed people (148 cases), meaning that some individuals in this group were unable to leave their homes or access support services or care at points. Services for this group are now running again and the backlog is being addressed, however there were reported incidence of hospital admissions due to a loss of mobility and other safeguarding issues during the pandemic.

There is also a Deaf Centre register in Norfolk which captures details of adults who are Deaf or Deafblind. There are reported to be around 500 BSL speakers in Norfolk (with around 97% of this group being known to the Council). While this is a small group, qualitative feedback from Sensory Support suggested that this group were also likely disproportionately negatively impacted by the pandemic, particularly as a result of the required closure of Deaf Centres across Norfolk, and because of the move to online service provision when such technology is often inaccessible for some Deaf people. Older BSL speakers in Norfolk (aged 65+ years) were reported as being more likely to be adversely impacted due to their lower general literacy and/or learning difficulties. Many in this group were also shielding due to their age and vulnerability. As a result, some extremely vulnerable Deaf people in Norfolk may have experienced total social isolation during periods of the pandemic.

Adults in receipt of short-term support

In 2018 it was reported that “Adult Social Services provides short-term support to almost 900 adults aged 18 and over 39... Ethnicity is recorded for 90% of those adults receiving short-term support, with around 98.5% recorded as White and the remaining 1.5% non-White, which is a lower rate than for those aged 18 and over in Norfolk’s general population (3% in the 2011 Census)... it is reasonable to suggest that there is more ethnic diversity among Norfolk’s population... and therefore there is likely to be a greater degree of under-representation of people from BAME groups receiving short-term support, than the data suggests. It should be noted that numbers are very low for people receiving short-term support within some specific ethnic groups, and for those with Gypsy or Irish Traveller heritage the numbers are extremely low.”¹¹⁷

In 2019/20, of 7526 people accessing short-term support, **33%** were identified as having “no services provided”, while **57%** of people accessing short-term support had “early cessation of service/long term support”. In 2020/21 of 6705 people accessing short-term support, **34%** were identified as having “no services provided” while **58%** of people accessing short-term support had “early cessation of service/long term support”.

¹¹⁶ Information provided by the Sensory Support Unit 2021

¹¹⁷ Lifelong outcomes of BAME people and Disabled People in Norfolk 2018

Of the remaining adults in the Service who were in receipt of short-term support in the year (731 in 2019/20 and 527 in 2020/21).

Ethnic group	2019/20 %	2020/21 %
White British	80	76
Undeclared/unknown	18	22
Any other White	1	1.3
Irish	0.3	0
Mixed/Multiple	0	0
Asian/Asian British	0	0
Black/Black British	0.1	0
Other	0.1	0

There were no service users identified as Gypsy/Irish Traveller in 2019/20, but three identified in 2020/21.

This dataset shows that it likely continues to be true that there is under-representation of people from diverse ethnic minority groups in receipt of short-term support. The % of service-users whose ethnicity is noted as “unknown” is noteworthy, as this suggests ethnicity data collection for short-term support service users may not be robust.

This is born out with anecdotal feedback from the People from Abroad Team who expressed a concern with ethnicity monitoring from “mainstream practitioners” citing that in their experience there was a “propensity for practitioners to record “not stated” or “not asked” in our systems because they didn’t... feel comfortable to ask the question. Likewise, nationality and language spoken is often poorly recorded”.

While Adult Services systems have the facility to capture monitoring information on sexual orientation and faith & belief, it is noted that these are not statutory reporting requirements and where this data is held, any analysis would likely be robust given the gaps (although it may be captured quantitatively in case recording notes).

In 2019 discussions took place as to whether more sensitive information could be captured about the gender-identity of service users however it was decided not to have additional monitoring categories added at this time as a result of financial assessments using binary-sex monitoring.¹¹⁸

Recent national research (February 2021) identified that “people from ethnic minority groups (especially Pakistani and Bangladeshi groups) are more likely than those from the White British group to report limiting long-term illness and poor health, with those identifying as White Gypsy and Irish Traveller reporting the poorest health. Health-related quality of life scores at older ages, based on responses to the GP patient survey, are lower than average among most ethnic minority groups, especially the White Gypsy and Irish Traveller, Bangladeshi and Pakistani groups, but not among some others (Black Caribbean, Black African and Mixed groups).

¹¹⁸ Information provided by Strategy & Transformation (I&A)

Ethnic minority groups also have an increased prevalence of some long-term conditions (eg, diabetes), but not of some other common conditions (eg arthritis).¹¹⁹

Generally, it should be considered that **the under-representation of particular diverse ethnic minority groups in social care could be driven, in part, by unconscious/structural biases coming into play**. It is important to reflect that these may impact how referrals come into the Council. In order to understand whether this is the case, further multi-agency work could support greater understanding of why particular diverse ethnic minority groups continue to appear less likely to be referred, or indeed self-refer for support, and help identify what barriers particular groups may be experiencing. Understanding the drivers for health inequalities and how these change outcomes for diverse ethnic minority people would also add to the narrative around adult social care involvement and engagement.

Are people with protected characteristics are more or less likely to be involved in road traffic collisions?

In 2018 it was reported that “there were 542 Road Traffic Collisions (RTC) attended by NFRS, of which ethnicity is recorded for 92%. Of those where ethnicity is recorded, 97.0% are White and the remaining three per cent non-White, which is reasonably comparable with the Norfolk population (3.5%).”¹²⁰

It was also reported at this time that there was likely to be more ethnic diversity in Norfolk’s population than estimated and therefore there was likely to be under-representation of people from ethnic minority groups in the data.

The latest Casualty Reduction dataset for Norfolk includes limited ethnicity monitoring data.

It has been reported that Norfolk Fire & Rescue (NFRS) officers may find it challenging to collect ethnicity data at the scene of an RTC, and therefore data may often be missing or officer rather than self-defined. It has also been reported that ethnicity and disability are not statutory reporting requirements, so there is no comparable national dataset.¹²¹

In 2019 and 2020¹²² in Norfolk, casualties in RTCs were substantially more likely to be male (60%) than female (40%). People aged 21 to 30 years were most likely to be casualties in RTCs.

In 2019 of the 481 RTC calls, 82%, were classified “British”. 11% had no ethnicity stated and 4% were “other-White”, the remaining 3% being “Other-ethnic group”.

In 2020, of the 317 RTC calls 78% were classified “British”, 15% had no ethnicity stated and 5% were “other-White”, the remaining 2% being “Other-ethnic group”.

¹¹⁹ [The health of people from ethnic minority groups in England | The King's Fund \(kingsfund.org.uk\)](https://www.kingsfund.org.uk/publications/health-ethnic-minority-groups-england)

¹²⁰ Lifelong outcomes of Black, Asian and minority ethnic people and disabled people in Norfolk - 2018

¹²¹ Network Safety Team – Community & Environmental Services.

¹²² Age, Sex and Ethnicity data 2019 and 2020 supplied by Road Casualty Reduction Analyst.

It is noted that there was likely a substantial decrease in RTC's in Norfolk as a result of the "stay home" instructions issued to the population during the peaks of the pandemic.

This data suggests that there has been an increase in ethnic minority people in Norfolk being involved in RTCs since 2017, particularly potentially people from White-Other groups, although it should be noted that the data collected at incident may not be robust, and RTCs may also involve multiple casualties from different ethnic backgrounds.

New national research from 2020 into road traffic and injury risk in ethnic minority populations shows that deprived ethnic minority pedestrians are over three times more likely to be a casualty on British roads than White non-deprived pedestrians.¹²³

¹²³ [road-traffic-injury-risk-amongst-gb-black-and-ethnic-minority-populations.pdf \(livingstreets.org.uk\)](https://www.livingstreets.org.uk/road-traffic-injury-risk-amongst-gb-black-and-ethnic-minority-populations.pdf)

Chapter 4: Service delivery

Key line of enquiry (E) – Is the proportion of people using Council services broadly in line with Norfolk’s demographic profile?

Adult Education offer a broad range of learning programmes for adults in Norfolk. Funding for programmes comes from a range of sources. In 2020 8500+ learners were on programmes in the academic year. Adult Education successfully transferred 100% of their courses online during the pandemic and were identified as the “Adult & Community Learning Provider of the Year” in May 2021, partly as a result of the positive feedback from learners with disabilities.

A snapshot of Library Services (registered and active members) in May 2021 shows that there were 440,326 registered members and 85,473 active users. The service was operating at about 20% capacity as a result of the pandemic at the time of writing this report, therefore it should be considered that the reported “active users” may not reflect normal service usage levels.

A comparison of 2019/20 and 2020/21 INTRAN data shows a 63% increase in use of interpreting services across the Council in 2020/21. As well as a substantial increase in overall usage, the Council saw a shift from face-to-face interpreting to telephone/video link interpreting, with around 94% of interpreting taking place on the telephone or online in 2021 (from 60% in 2020). The INTRAN data may offer an indicator of greater engagement with/increased demand for services and support from some diverse ethnic minority people in Norfolk.

In 2020/21, 45% of front door customer interactions were online. 73.3% of online front-door interactions were for Children’s Service and 53.6% were for Community & Environmental Services. 13.7% were for Adult Social Care. While data around service users “protected characteristics” is not usually captured by Customer Services at the front door (telephone/or online enquiries), this information is routinely recorded on Adult’s and Children’s Services case recording systems.

All Council publications and the website follow accessibility guidance/standards. The Council’s website has accessibility statement which explains how the website can be navigated by users of assistive technology.

Adult Education

Adult Education offer a broad range of learning programmes for adults in Norfolk across four strands:

- Education & Training (functional and vocational qualifications funded by the DfE)
- Apprenticeships
- Community Learning (100% grant funded courses)
- Personal Development (self-financed by learners with no government funding or requirements).

A reasonable amount of data is collected about learners and outcomes.¹²⁴

In the academic year 2019/20 in Norfolk, the service incorporated 8538 learners of whom **69%** were female and **31%** were male. The participation split between males and females was reported to be in line with the national data for Adult & Community Learning providers.

In terms of achievement males were slightly more likely to achieve at 91% in comparison to 88% of females, although it was reported that a 3% gap in achievement is deemed insignificant in the FE sector.

In 2019/20 The highest proportion of adult learners in Norfolk (**46.6%**) were aged 31 – 48 years. Learners aged 19 – 24 years accounted for 7.6% of the cohort, while learners aged 61+ years accounted for 14.9%.

Learners aged 19-20 years were less likely to achieve than all other age groups at **79%** although 100% of learners under 19 years achieved. **92%** of learners aged 61 – 67+ years achieved by comparison.

It is noted that the 19-20 years age group tends to be young people who are taking basic level entry qualifications not previously achieved, so the achievement rate is a substantial improvement on school/college level attainment rates.

In 2019/20 the Service also delivered courses to 1256 learners aged 61+ years online during the pandemic, including one learner aged 96.

In 2019/20 in Norfolk, **20.1%** of the cohort identified as having a learning difficulty or disability, which directly correlates to the percentage of disabled people who are likely living in Norfolk. **89%** of both disabled and non-disabled learners achieved in the year.

This level of attainment was maintained with the intensive use of additional learning support throughout the pandemic. Feedback from learners with disabilities was very positive about the accessibility of the online offer.

It is noted that Adult Education successfully transferred 100% of their courses online during the pandemic, and as a result were identified as the “Adult & Community Learning Provider of the Year” in May 2021 because of their success in maintaining engagement with learners.¹²⁵

In 2019/20 **74.6%** of the cohort identified as “White British” and **15.1%** “Other ethnicity”. 10.4% of the cohort’s ethnicity was unknown. It is noted that Adult Education appears to be very successful in attracting learners from a non-White British background.

84% of learners from a non-White British background achieved in comparison to **90%** of White British learners. It was reported that learners from “Other” ethnic groups (often migrant workers) were significantly more likely to attend courses that have lower attainment levels nationally, including entry level English, Maths and

¹²⁴ Adult Learning Equalities Data 2019/2020

¹²⁵¹²⁵ [TES FE Awards 2021: Norfolk County Council](#)

ESOL. This had an impact on achievement rates for these groups, however generally achievement rates were significantly higher (21%) than national FE outcomes.

Library Services

In 2018 it was reported that “Ethnicity is known for around 70% [of library users] with 94.6% of those recorded as White, compared with 96.5% in the general Norfolk population... Of those recorded as White, there is a lower proportion of White British and a higher proportion of those recorded as Any Other White background using the libraries than in the general Norfolk population. For those with an Asian heritage and those with a mixed heritage, proportions are similar to the general population, although rates for those with a Black heritage and those of Any Other Ethnic Group are higher than the general population... the data suggests that a higher-than-expected level of library users are from BAME groups... numbers with Gypsy or Irish Traveller heritage are extremely low.”¹²⁶

Library data for 2021¹²⁷ shows that in Norfolk as of May 2021 **54.4%** of registered members were female in comparison to **37.8%** male (7.72 unknown). Registered members were fairly evenly dispersed across age bands with around 10 – 11% for each age group, with the exception of the 35-49 years age group (**19.5%**) the 16-24 years age group (5.7%) and 80+ years (2.5%).

It is noted that there the Libraries Service is currently operating at about 20% capacity as a result of the pandemic, and therefore active users may not reflect normal service usage.

A snapshot at May 2021 shows that there were 440,326 registered members and 85,473 active users.

Of active users:

- 60% were White British people
- 33.5% were Unknown/Undisclosed
- 3.6% were White Other people
- 1.1% were people from another ethnic group
- 0.8% were Asian/Asian British people
- 0.6% were people from Mixed/Multiple ethnic groups
- 0.4% were Black/Black British people

Of registered members

- 60.6% were White British people
- 31% Unknown/Undisclosed
- 5.2% were White Other people
- 1.9% were Asian/Asian British people
- 1.3% were people from another ethnic group

¹²⁶ Lifelong outcomes of BAME people and Disabled People in Norfolk 2018 – SPYDUS Libraries database (March 2018)

¹²⁷ Spydus Library Data – May 2021

- 1.2% were people from Mixed/Multiple ethnic groups
- 0.6% were Black/Black British people

This snapshot indicates that there may still be higher proportion of people from ethnically diverse minority groups as members/active users particularly people who self-defined as “White Other” or “Other” ethnicity. It is noted that ethnicity data collection within the service appears to have remained static since 2018 at around **70%**.

The Libraries Service does not collect data on the sexual orientation of members, or on disability but it is noted that **1.61%** of Registered Users are Home Library Service or Equal Access customers.

Are people with protected characteristics able to access services and communicate effectively with the Council, to the same extent as people who do not share these characteristics?

Customer Services does not capture data around service users “protected characteristics” at the front door (telephone/or online enquiries), although this information is routinely recorded (to differing degrees) on Adult’s and Children’s Services case recording systems.

In 2020/21 **55%** of all front door customer interactions were via the telephone (over 76,000 calls were received in the year by Customer Services).¹²⁸ Some front-door interactions were not captured in the dataset (school transport and finance). 33.8% of telephone calls received were for Adults Services and 19.5% were for Children’s Services. 73.3% of online enquiries were for Children’s Services and 13.7% were for Adults Services.

This data collectively indicates that around **70-75%** of all enquiries were for social care services where monitoring data around different “protected characteristics” is captured for service users.

There was a substantial decline in telephone calls between April and July 2020. This was due to the impact of the pandemic on front-door services and a change in ways of working. There was a correlating increase in online enquiries in the period.

It is noted that there were no datasets available about service users with “protected characteristics” in receipt of transportation services. Council transportation is provided to service users following defined eligibility criteria. Qualitative feedback from the service was that anyone would be entitled to apply but would only be in receipt of the service if they met the criteria.¹²⁹

¹²⁸ Customer Services Overview – April 2020 – 21

¹²⁹ Travel and Transport Services

Use of interpreting services (INTRAN)

A comparison of 2019/20 and 2020/21 INTRAN data shows a **63%** increase in use of interpreting services across the Council in 2020/21. The Council's INTRAN bookings¹³⁰ show that in 2019/20 the Council made **6447** bookings for interpreters in comparison to 2020/21 when it made **10497** bookings.

The highest % usage of INTRAN services in year (% of all Council bookings):

Service	2019/2020 %	2020/2021 %
Children's Services	64	44.8
People from Abroad	26.8	31
Education	2.3	11
Adult Services (other)	3.5	3.2

Children's Services had the highest proportion of usage across both years, likely reflecting the ongoing needs of specific groups of service users and the broad diversity of children and families within the system.

Adult Services experienced less % change in usage than other areas across the pandemic, except for the People from Abroad Service, which saw an increase in usage.

Education saw the most significant increase in usage in 2020/21. This shift in supply/demand may indicate that non-English speaking/English as a second language parents and families may have experienced some additional challenges or required additional support during the pandemic with respect to their children's education (considering the move to home-schooling may have had greater impact for some people within this group).

As well as a substantial increase in overall usage of INTRAN services, the Council also saw a shift in requests from face-to-face interpreting to telephone/video link interpreting, as might be expected.

Year	Face to face	Telephone and video
2019/20	40%	60%
2020/21	6%	94%

In 2019/20 and 2020/21 Arabic was the most commonly requested language, accounting for **30%** of all bookings, followed by Lithuanian (19%), Polish (10%), Portuguese (5.6%) and Kurdish-Sorani (4%). This is of interest, given ethnic monitoring across service areas does not indicate that there are particularly high numbers of Arabic service users present within case-management systems. Again, it would be useful to understand whether the requests for Arabic interpreters were for a specific number of service-users (possibly as regular users) or in a specific service area as a result of a specific need.

¹³⁰ Information provided by INTRAN for the purposes of this report.

By contrast, bookings for BSL interpreters fell from 78 bookings (all face-to-face) in 2019/20 to 33 (21 face to face and 12 telephone/video) in 2020/21.

In 2019/20, 45% of BSL interpreter bookings were made by Adult Services, and 23% were made by Children's Services. In 2020/21, 36% of BSL bookings were made by Adult Services while 27% were made by Children's Services. This supports other quantitative evidence to suggest that Deaf people may have experienced challenges as a result of the pandemic impact, partly as a result of the wider move to online provision.

Does the Council's website and information materials reflect Norfolk's diversity?

The Council's website contains a significant amount of information about the broad range of services provided across the Council.

In 2020/21, **45%** of front door customer interactions were online.

73.3% of online front-door interactions were for Children's Service and 53.6% were for Community & Environmental Services. 13.7% were for Adult Social Care.¹³¹

The Residents Survey 2019 reported that **51%** of respondents identified that their preferred methods of contact were leaflets of newsletters, in comparison to 18% who preferred the Council's website, and 14% who preferred social media. This finding may reflect the older age of respondents to the survey.

In 2020/21 in terms of online usage, **92.1%** of library services usage was online and **86.9%** of Blue Badge applications were made online. It is noted that some services moved their provision online because of the pandemic, for example **44.7%** of registrar bookings were made online in 2020/21 because the service stopped taking bookings by phone.

52.6% of Children's Social Care usage was online in comparison to **18.6%** of Adults Social Care, likely reflecting the younger age of those engaging with Children's Services in comparison to Adults Services.

The top 5 pages (unique page views) in 2020/21 were:

- Term dates and school holidays
- The Council home page
- Norfolk Fire and Rescue Service
- Coronavirus
- Education – course search

All Council publications and the website follow accessibility guidance/standards, and the Council engages with local Disability groups who give advice and support on creating appropriate accessible format information. Where it is deemed necessary

¹³¹ Customer Services Overview April 2020 - 21

(given target audiences/statutory requirements), Easy Read information and translated materials are provided.

The Council's website has accessibility statement¹³² which explains how the website can be navigated by users of assistive technology.

The INTRAN logo is routinely displayed on published materials, indicating that they are available for translation.

In accordance with accessibility guidelines, the Council's website generally does not contain a significant number of images of people, but rather it uses plain text on most key pages. What is noted is that there appears to be a predominance of images of White people, with limited representation of non-White diverse ethnic minorities. There are a balance of images of older people, children and young people in appropriate health and care settings, and some images of people with physical/learning disabilities.

It is noted that in the latest online version of "Your Norfolk" magazine the main image of a person from a diverse ethnic minority background was linked to an article on safeguarding and reporting abuse.¹³³

It is noted that in the Marriages and civil partnership section, an image of a same sex-couple is displayed prominently. This is the only image that could be identified on the Council's web pages of a same-sex couple or family.

Multi-agency partner logos and links are displayed where appropriate.

In the Norfolk Fire & Rescue Service pages there are a significant number of images of female fire officers and recruits displayed prominently. There was only one image identified of a male fire officer from a non-White background (on the Twitter feed). On the FAQ section of the NF&RS pages, eligibility for applicants without British citizenship, eligibility with a disability and age restrictions are explained. Faith considerations and facilities for male and female officers are also explained. There is also a section on engagement activities for children and young people, including the Crucial Crew (aged 10-11) and Fire Cadets (aged 13-17).

Social media

The Council has a presence on Facebook and Twitter. Over 41,000 people follow the Council on Facebook, and 54,000 follow the Council on Twitter.

A light touch review of the Council's social media feeds in 2021 shows that the Council has used significantly more images of ethnically diverse people on social media, particularly with respect to COVID-19 vaccination messaging, likely following national campaign trends identifying that certain ethnic minority groups were less likely to take up the offer of vaccines at the beginning of the roll-out.

The Council's support for LGBTQ+ people has also been evidenced in social media, particularly with respect to support for LGBT campaigns, including Pride month.

¹³² [Accessibility statement - Norfolk County Council](#)

¹³³ [Your Norfolk - \(norfolkpublications.org.uk\)](#)

Chapter 5: The service-user experience

Key line of enquiry (F) – Is the ‘service user experience’ for residents broadly similar across all people with protected characteristics?

Very little monitoring data has been identified with respect to overall satisfaction levels of service users with “protected characteristics”, so it is not possible to determine across the Council, whether service users with protected characteristics have differing levels of satisfaction (taking account of the broad range of services provided by the Council).

Understanding of how people with diverse protected characteristics experience services likely comes from strategic and grass roots engagement with communities, and through the Council’s consultation work (**see Chapter 6 of the report**).

Currently the Council does not capture information about complainants “protected characteristics” for monitoring purposes. All complaints received are collated on a separate database which can be interrogated thematically. Qualitative feedback indicated there have been limited numbers of complaints received from people with “protected characteristics” in respect of discrimination or harassment in recent years.

Do people with protected characteristics experience similar levels of satisfaction with services compared to people who do not have these characteristics?

Both Adults and Children’s Services have staff whose responsibility it is to quality-check the performance of practitioners responsible for case management and ensure statutory timescales and outcomes are achieved. Adults and Children’s Services also routinely issue tailored “Have your say” feedback forms to service users. The Children’s Services form includes diversity monitoring, while the Adults does not. It is understood that the data captured on these forms is not currently collated anywhere.¹³⁴

Children’s Services have a specific action within the anti-racist practice group to undertake an “audit of anti-racist practice through dedicated manager audits across all teams” and to undertake further “analysis within social care of how cases progress”.¹³⁵ At the time of preparing this report, these actions were ongoing, but when completed should provide the Service with qualitative evidence of how children from diverse ethnic minority backgrounds experience case-management.

¹³⁴ Information received from Strategy & Transformation – Complaints/Customer Services

¹³⁵ Anti-Racist Practice Action Plan – Children’s Services

Much of the understanding of how people with diverse protected characteristics experience services likely comes from strategic and grass roots engagement with communities through consultation work (see **Section 6** for more information).

The Norfolk Residents Survey

The 2019 survey provided an overview of service user satisfaction¹³⁶. The report notes that 1148 doorstep surveys were carried out to inform the research with a “representative sample, by age, gender and rural/urban classification”. It is noted that **28%** of respondents were 65 years or older in comparison to **14%** who were aged 25-34.

97% of respondents were identified to be non-BAME (presumably White or White British) and 19% were identified to be disabled. It is likely that because of the small sample of non-White and disabled people results were not aggregated down, and it is noted that had they been, statistical inferences would not be robust.

This research found that **75%** of respondents were satisfied with the way the Council ran things, from 42% in 2014 (61% nationally), while **60%** stated they were satisfied that the Council provided value for money (44% nationally). This demonstrates that in 2019 residents generally had higher levels of satisfaction with the Council. It was noted that there were distinct differences in perceptions and priorities at a District level.

97% of respondents felt that the most important focus outcome for the Council should be “Supporting people with disabilities to live well independently”. 95% said this should be “Supporting older people living independently for longer”. Adult Social Services was identified as the most important service. These priorities may reflect the older age profile of the respondents.

70% of respondents felt that they “disagree[d] that they can influence decisions” and it was noted that age was a factor where respondents held this view.

It is not known as to whether there is a specific plan to repeat this research. If this research was to be repeated it might be possible to use comparable datasets to develop a baseline profile for satisfaction for people from diverse ethnic background and people with disabilities.

Are people with protected characteristics are more or less likely to make a formal complaint to the Council, or seek to appeal a decision?

Currently the Council does not capture information about complainants “protected characteristics” for monitoring purposes. All complaints received are collated on a separate database which can be interrogated thematically.

Qualitative feedback indicates there have been limited numbers of complaints received from people with “protected characteristics” in respect of discrimination or harassment in recent years. It is understood that where such complaints are

¹³⁶ [Residents' survey - Norfolk County Council](#)

identified to be an “equality issue” advice and guidance is sought from the Equality, Diversity and Inclusion Team.

Complaints are reported on annually, and the July 2020 report¹³⁷ noted that numbers of complaints were down on the previous year at **2169** complaints and 884 MP enquiries. **34%** of complaints related to Community & Environmental Services, **32%** related to Children’s Services, and **24.6%** to Adult Services.

The report also noted that a peak in complaints in September 2019. This was identified to be a result of a significant increase in complaints regarding delays in assessments and awards of Education, Health and Care Plans (EHCPs)¹³⁸. Complaints in this period were also reported to relate to structural changes introduced within Adult Services with respect to how Personal Independence Payments were being calculated locally. The same report also noted that Customer Services received 96 complaints, mostly in relation to the allocation of Blue Badges and concessionary travel passes.

This thematic analysis identifies that at this time disabled service users were most likely proportionately over-represented in complaints received by the Council.

¹³⁷ Corporate Select Committee Report - Compliments and Complaints July 2020

¹³⁸ deemed a national issue due to the increasing demands from children with identified Special Educational Needs; and the complaints reflected capacity issues in the Educational Psychology Service locally

Chapter 6: Engagement with service-users

Key line of enquiry (G) – Does the Council engage proportionately with all communities, and take steps to seek out the views of people who are seldom heard?

There is limited evidence of consistent, robust monitoring of the “protected characteristics” of children and young people involved in engagement activities.

Qualitative feedback indicates there is coordinated activity taking place within Children’s Services to facilitate the participation of a diverse range of children and young people. This is done through several different groups and forums with different areas of focus (including politics and activism, mental health, LGBT+, disability and unaccompanied asylum seeker children). The available qualitative evidence indicates however, that children and young people from some diverse ethnic minority backgrounds are not always well represented, and it difficult to identify whether LGBT+ children and young people are proportionately represented across all engagement work.

It is also likely that there is not consistent, robust data collection with respect to the numbers of adults with “protected characteristics” involved across all Council engagement activities. There is evidence to show that there is engagement with diverse forums and groups, both at a strategic and grassroots level, (particularly for disabled and older people). The Council also routinely works collaboratively with the Norfolk LGBT project and Norwich Pride to engage with LGBTQ+ people.

The Council has worked with organisations such as Bridge Plus, New Routes and GYROS to engage with people from refugee, asylum-seeker and refugee communities in Norfolk; particularly during the pandemic, when these groups provided assistance in targeting messaging to particular ethnic minority communities who were seen to be more likely to be adversely impacted.

Co-production is a key aspect of commissioning, particularly in Health and in Social Care, therefore there is likely engagement work undertaken within Public Health and Adult Services, which is not reflected in the below analysis.

The Council does not currently have a corporate engagement strategy. A new Community Communications Engagement Officer role has been introduced in 2020 to ensure that “hard to hear” communities and grass roots community organisations are being engaged with.

There is limited visible evidence of consistent or robust monitoring of respondents to consultations “protected characteristics” to ensure they are proportionately represented.

Most consultations are understood to be run by teams within services, as required for the purpose of informing service design and delivery. There is a general expectation that when consultations are run, they should include diversity monitoring

and take account of the differing views and experiences of people from different backgrounds and experiences. In practice, this does not always appear to be the case. If teams do not review and check whether they are genuinely engaging different communities, the likelihood is that not all communities will participate, and the Council may not fully understand the views of people from different backgrounds.

Generally, the available evidence indicates that there is likely not consistent or visible strategic engagement with diverse ethnic minority people and people from all of Norfolk's diverse faith groups to ensure that their views and experiences are routinely considered in service development/strategic planning. This is important as the lack of visible strategic engagement/challenge may enable unconscious biases to go unchecked and unchallenged. LGBTQ+ people may also likely be under-represented in some strategic engagement forums.

Do engagement mechanisms for adults and young people reflect Norfolk's diversity, and whether sufficient efforts are made to engage adults and young people from under-represented groups?

Children and young people

While there is currently not robust data collection/monitoring with respect to the numbers of children and young people with "protected characteristics" involved in all engagement activities, the evidence does show that there is a significant amount of activity taking place within Children's Services to address this and facilitate the participation of a range of children and young people.

Children's Services maintains engagement with several diverse groups and forums for children and young people including¹³⁹:

- 7x District-level Youth Advisory Boards, involving 300+ young people aged 11-25 years (no monitoring data available)
- The UK Youth Parliament (4 members are elected from Norfolk each year)
- The Youth Activist Network, a Norfolk-wide movement involving 20 young people aged 13-26 years
- The Norfolk Youth Commission (PCC) involving 20 young people aged 13-25 looking at policing and crime
- 3x Mental Health Adolescents for Service Change (MASC) adolescent participation groups.
- 4x BLAH LGBTQ+ Youth project groups for young people under 25 years
- 5x area-based Norfolk Young Carers Forums, for young people aged 12-19 years
- The DRAGONS (Disability Real Action Group of Norfolk), involving 10 people aged 11-25 years with physical, sensory and learning disabilities
- The Unaccompanied Asylum Seekers group (for UASC children and young people in Norfolk)

¹³⁹ Through Commissioning and Service Development (Adolescent Services)

It is reported that around 1000 children have been engaged with through these groups and activities. Some of these groups have restricted cohorts such as the UASC and Dragons groups.

Adolescent Services have reported that groups such as the Youth Advisory Boards and Young Commissioners “are not set up to engage proportionately with communities but they do have a good spread of representation of gender, LGBTQ+, White European, White British and socio-economic status. We know we are under-represented by Black and Asian communities and young people with disabilities, and we are taking steps to increase engagement with these communities. These groups are represented but not on a proportionate basis and we do need to increase the involvement by young people in these communities.”¹⁴⁰

As of March 2021, specific actions have been agreed through the Council’s Equality, Diversity and Inclusion Performance Board, chaired by the Cabinet Member for Communities and Partnerships, to:¹⁴¹

- Review membership of Young Commissioners to ensure they reflect the local community with particular reference to young people from ethnically diverse backgrounds and other protected characteristics.
- Address the under-representation of Black, Asian, Arab and Gypsy, Roma and Traveller children and young people with an aim to have this increased by April 2022, through a) utilising existing structures and the participation network b) engaging Community Partnership Officers to build relationships with local community associations/ faith groups.

Children’s Services is also responsible for the Norfolk In-Care Council (NiCC) which all Looked After Children in Norfolk are automatically members of. Children’s Services has a statutory obligation to actively involve children and young people in planning and decision making (including those who have left care). A representative from the NiCC sits on the Corporate Parenting Board. It was reported that the NiCC has 28 active members across the 6 localities (aged 6 –25 years). 14 members were reported to identify as non-White British, and 5 were reported to identify as having a disability. Information is not held about the sexual orientation of members.

Monitoring information about engagement with Looked After Children and Care Leavers was captured in the Bright Spots Survey in 2020 when age tailored surveys were commissioned to understand the experiences/views of these cohorts in Norfolk. It is noted with respect to the findings of this research¹⁴²:

- Your Life Your Care Survey (4-17 years) The views of boys were slightly under-represented in the survey responses: 55% of the looked after population were boys, whereas 47% of respondents were boys. Minority ethnic children were also slightly under-represented with 10% in the sample compared to 15% in the looked after population.

¹⁴⁰ Adolescent Services – Commissioning & Service Development April 2021

¹⁴¹ EDI Project Board - Objective 1

¹⁴² Additional information supplied by the Children & Young People’s Participation Team

- Your Life Beyond Care (18–25 years). 78% of respondents were young women. 87% were of white ethnicity. 37% of respondents reported having a disability/long term health condition.

It is noted that the Norwich Youth Advisory Board identified that tackling racism and religious discrimination was one of the top 5 priorities for young people in Norwich in 2018/19 following consulting with over 2500 young people. **47%** of young people identified that racism was affecting them or their area.¹⁴³

There is also direct one-to-one engagement with more vulnerable children through the Virtual Schools (including pupils with a range of disabilities/special educational needs and Gypsy, Roma and Traveller pupils). Independent Reviewing Officers are also responsible for meeting with all Looked After Children to ensure their views are captured in case management and planning meetings, and targets are set and monitored by management with respect to engagement and involvement at this level.

It should be noted that Norfolk Fire and Rescue Service has made specific efforts to engage girls and young women in sharing their views about the fire service, as part of their wider strategy to increase the number of women in the workforce. For example, in February 2021, 70 Norfolk school children (35 girls and 35 boys) were invited to “Ask a Firefighter”, to better understand the views of girls and boys about this vital role, their questions about gender parity and diversity.

Following this, a “Women in Fire” workshop took place on 20 May 2021 with young women from an educational establishment and an all-women NFRS panel drawn from different roles, fire fighters, SMT, comms, HR. This highlighted a range of useful issues.”

Adults

Again, the evidence suggests that data collection and monitoring with respect to the numbers of adults with “protected characteristics” involved in Council engagement activities is limited.

There is evidence to show that there is engagement with several diverse forums and groups both at a strategic and a grassroots level.

It is noted that co-production is a key aspect of commissioning, particularly in Health and in Social Care, therefore there is likely more specific engagement work undertaken within Public Health and Adult Services than has been captured in the analysis.

The Norfolk Learning Disabilities Partnership Board monitors the joint commissioning strategy and coordinates 5 locality groups who look at local issues for people with learning disabilities and their families. The Board includes representatives of people with learning disabilities as well as partner agencies and the voluntary and community sector.

¹⁴³ Norwich YAB Consultation Report 2018/19

The Norfolk Autism Partnership Board makes decisions around partner responses to autism and informs the local autism Strategy and includes representatives of people with autism and their families working alongside partner agencies and the voluntary and community sector.

The Norfolk Older People's Strategic Partnership is actively involved in working with the Council on matters affecting older people in Norfolk, including the joint dementia strategy.

The Council also routinely works collaboratively with the Norfolk LGBT project and Norwich Pride to engage with LGBTQ+ people on issues that are important to them.

2000 local residents are members of the Norfolk Residents Panel who are invited to participate in surveys, focus groups and online sessions throughout the year about a range of topics. It is reported that members of the panel are recruited to be broadly representative of the wider population. At this time however, there does not appear to be monitoring information available for analysis about the protected characteristics of members of the Panels, although information is available about panel members per district.

At a grassroots level, Adults Services has Community Focus Officers who are responsible for identifying and working within localities to engage with communities to develop support mechanisms and address local issues.

The Council has also worked with organisations such as Bridge Plus, New Routes and GYROS to engage with people from refugee and asylum-seeker communities in Norfolk; particularly during the pandemic, when these organisations assisted with targeting messaging to particular diverse ethnic minority groups who were seen to be more likely to be adversely impacted by COVID-19.

The Council does not have a corporate engagement strategy, which may make monitoring of engagement activities across the whole organisation more challenging. A database of community stakeholders, including voluntary organisations and faith groups is being developed as a resource for staff to draw on when undertaking engagement activities and to improve coordination.¹⁴⁴

There is less evidence available to show where there is strategic engagement with people from diverse ethnic minority backgrounds to consider specific issues/barriers facing people from these communities in Norfolk. The same is likely true of faith groups although they may also be involved in a range of activities in local communities through grassroots engagement.

As a result of learning gained during the pandemic, a new Community Communications Engagement Officer role has been developed to ensure that "hard to hear" communities and grass roots community organisations are being engaged with. The post holder identified that a key point of concern was the engagement with the Deaf community in Norfolk in 2020/21, who as a result of the move towards

¹⁴⁴ Consultation and Community Service

online activities, and the closure of the Deaf Centres have become particularly isolated.

Do respondents to formal consultations reflect the population of Norfolk as a whole?

There is some evidence of monitoring of “protected characteristics” in consultations. The majority of consultations are run by teams within Services, as required for the purpose of informing service design and delivery. There is a general expectation that when consultations are run, they should include some diversity monitoring and take account of the differing views and experiences of people from different backgrounds and experiences. In practice, however, this does not appear to be monitored strategically. The Council does have officer resources dedicated to supporting the implementation of service consultations.

Norfolk Consultation Finder¹⁴⁵ is used to upload and hold details of consultations taking place, however this is dependent on these being uploaded by the consultation owner. A light touch review of published consultations showed that a majority on this system were for highways and transport developments, none of which reviewed appeared to have included monitoring of “protected characteristics”.

It is deemed likely that there have been more consultations carried out across the Council, than are recorded on the Consultation Finder, and it is also likely that some of these will have been targeted to particular groups, (particularly as a result of commissioning needs in Health and Social Care). It is noted that many larger consultations are run in partnership with other statutory agencies, who will share responsibility for engagement activities.

It was reported that residents who do not have online access to engagement materials can provide written responses to consultations, but this would be dependent on whether they were aware of the consultations taking place in the first instance. It is noted that videos have been produced which are uploaded onto the consultation hub, but again this would be dependent on people having access online or through social media.¹⁴⁶

The Norfolk Residents Survey 2019 included information about the diversity of respondents, however, likely as a result of the small sample size, results were not aggregated down by ethnicity or disability.

Outcomes and results of consultations are published on the “we asked, you said, we did” pages of the Consultation Hub. A light touch review of publications here showed very little evidence of monitoring of the “protected characteristics” of respondents.

There was consideration of the need to obtain responses from disabled people and their families during the consultation on the proposals to change adult social care charging in 2019¹⁴⁷ and again it is noted that there are several strategic groups

¹⁴⁵ [Find Consultations - Norfolk County Council - Citizen Space](#)

¹⁴⁶ Consultation & Community Service

¹⁴⁷ [Your views on our proposal to change our Adult Social Care charging policy - Norfolk County Council - Citizen Space](#)

advising the Council on issues facing disabled and older people, which could provide a gateway into these communities.

For the 2020/21 Council Budget, an Equality Impact Assessment and a Budget Consultation report were published on the Council's website. The consultation report provided a breakdown of respondents by age, gender, ethnicity, and disability and showed that all qualitative feedback was reported thematically. Specific feedback relating to the equality impact assessment process was reported separately. Respondents to the consultation were identified to be more likely to be older people, and predominately identified as being White-British. No respondents identified themselves as being Asian or Black. 13% identified as having a long-term health condition/disability. Due to the small sample size (203) it was likely not possible to aggregate responses by "protected characteristics" to robustly identify whether different groups had specific concerns or issues.¹⁴⁸

The Council has now supported the establishment of employee networks/forums for ethnic minority, disabled and LGBT+ employees, which groups could also provide valuable additional insight/challenge into Council functions and outcomes.

¹⁴⁸ [Budget Consultation Report 2020/2021.pdf](#)

Chapter 7: Risk Management

Key line of enquiry H – Does the Council’s risk management take account of the needs of people with protected characteristics?

There is evidence to indicate that the Council considers the needs of people with protected characteristics in its risk assessment planning. A range of indicative areas were reviewed at a high level – including: COVID-19 response and recovery; the Fire and Rescue Service’s Integrated Risk Management Plan and Safeguarding.

Of particular note is the extensive work undertaken by the Council during 2020 and 2021 to engage with people from diverse ethnic backgrounds, disabled and older people and people with long term health conditions impacted by the risk of COVID (covered elsewhere in this review). The Council’s Communications team published information for diverse communities about COVID in different languages before this happened nationally – a fact that was welcomed by local communities. Public Health is leading work to better understand and respond to health inequalities in Norfolk (covered elsewhere in this review). The equality impact assessment of the Integrated Risk Management Plan is comprehensive and sets out in detail how people’s protected characteristics may increase their vulnerability to the risk of fire. There is no evidence of a similarly detailed equality assessment elsewhere in the country or published by any other fire and rescue service.

Norfolk Fire and Rescue Services Integrated Risk Management Plan

The Norfolk Fire & Rescue Integrated Risk Management Plan (IRMP)¹⁴⁹ is produced in response to statutory obligations and aims to “identify, assess and mitigate all foreseeable fire and rescue related risks faced by the communities of Norfolk”. This plan builds on evidence gathered through performance indicators and measures of incidence within Norfolk.

It is noted that if there is limited data available to show that people with certain “protected characteristics” may be more likely to be at risk of harm in particular circumstances then the IRMP would not likely not take into consideration such risks at a strategic level. It is noted, particularly with respect to collecting ethnicity monitoring, such data may be more challenging for officers to collect at incident scenes, and it is not a statutory monitoring requirement.

Potentially a lack of recognition of the increasingly diverse nature of Norfolk’s population may impact on understanding how risks may increase for people with “protected characteristics”. It is particularly important to consider this when targeting the communications of key safety messages.

The IRMP reports that a lack of ethnic diversity in the local area “presents challenges for improving diversity through recruitment.”

¹⁴⁹ [Integrated risk management plan - Norfolk County Council](#)

The IRMP does show consideration of age, reflecting that “older people (especially those over 80 are more vulnerable to dying in a dwelling fire... the majority of people injured in fire are younger people”. Older people are also recognised to be more at risk of emergency admissions for falls. The IRMP acknowledges the impact of an increasingly older population. Reference is also made to the accidental dwelling fires on Gypsy and Traveller sites.

There is also some consideration that people with physical/learning disabilities may experience differing outcomes, although it is not made clear in the IRMP as to what might need to be done differently for these groups.

An Equality Impact Assessment (EqIA) of the IRMP was undertaken and has been recently published. This has been recognised as the most comprehensive EqIA of an IRMP in the country. The EqIA identifies that there is limited information available regarding whether “race” increases the risk of vulnerability to fire, possibly as a result that it has been identified that it is difficult for NFRS officers to collect robust ethnicity monitoring information.

The EqIA recognises that language may be a barrier to reading, understanding or processing safety information, warnings, or contacting the emergency services. Again, there is limited data available to understand the extent of the impact this might have on communities in Norfolk. It is noted that “new migrant communities may be more likely to live in houses of multiple occupation that have increased fire risk.”¹⁵⁰

The Norfolk Fire and Rescue Service is also leading on a regional Equality Diversity and Inclusion Forum¹⁵¹ to bring together leaders to escalate performance on equality and diversity and hold each other to account. The three key objectives of the Forum are:

- Demonstrate visible senior leadership on EDI, to help reduce resistance and uncertainty about the benefits amongst staff or middle managers and develop strong workplace cultures.
- Promote understanding of the Public Sector Equality Duty, equality impact assessments, and the common barriers that people with protected characteristics face when accessing fire and rescue services and information
- Be employers of choice; an attractive and diverse sector capable of recruiting, developing and retaining the right people, with the right skills, in the right roles, at the right time

A primary focus of the Forum is to increase awareness and understanding of diversity in the local area, and in the workforce, to ensure that inclusion is promoted throughout the service, and that leadership is skilled in recognising and responding to diverse communities’ needs.

¹⁵⁰ IRMP EqIA

¹⁵¹ Eastern Region EDI Forum 12 Month Plan 2021-22

The Norfolk Resilience Forum's Norfolk Emergency Response Guidance 2019¹⁵² has some limited information about "diversity needs" stating "An emergency could involve people from differing faith, cultural and religious backgrounds. All responding agencies must ensure that consideration is given to the specific associated needs during these traumatic events. Requirements may relate to medical treatment, gender issues, hygiene, diet, clothing, accommodation and place for prayer. Every care should be taken to cater for those needs. It is important to engage appropriate faith, religious and ethnic community leaders at an early stage." The guidance also makes reference ensuring there are facilities for disabled people.

The Norfolk Recovery Guidance 2020¹⁵³ makes specific reference to utilising faith networks to support communities, and to consider community cohesion.

Safeguarding

All safeguarding processes the Council participates in have structures in place to capture data with respect to the "protected characteristics" of vulnerable people. The MARAC (domestic violence) referral form¹⁵⁴ includes information about the age, gender (including gender-identity) sexual orientation, ethnicity, nationality/languages, and any disability. Children's and Adults Services have the facility to capture comprehensive monitoring information for all safeguarding referrals.

There is evidence that specific issues which may impact on people with "protected characteristics" are being considered as a result of analysis. For example, honour-based abuse, and exploitation/trafficking are both being considered by the Norfolk Safeguarding Children's Board and Norfolk Safeguarding Adults Board.

COVID-19

A "dynamic" Equality Impact assessment was published in December 2020 to consider the impact of the pandemic on people with "protected characteristics.

This reported that "Existing inequalities may deepen, and some people may become even more marginalised. People with multiple impairments may face the most challenges... Support for people with protected characteristics may be suspended, leaving many people vulnerable not just to the impact of COVID-19, but also to being unable to deal with benefits, housing, bills, correspondence or feelings." ¹⁵⁵

It is noted that this statement is supported by some findings within this report. There is qualitative and quantitative evidence available to show that some service-users with "protected characteristics" have likely experienced significant challenges in accessing services as a result of the closure of services and the move to a greater reliance on online provision.

¹⁵² [Norfolk Emergency Response Guidance 2019](#)

¹⁵³ [Norfolk Recovery Guidance 2020](#)

¹⁵⁴ [Multi Agency Risk Assessment Conference MARAC - Norfolk County Council](#)

¹⁵⁵ [Equality impact assessment Norfolk response to COVID 19.pdf](#)

It is also noted that during the pandemic, the Council's use of INTRAN services has increased dramatically, suggesting that there may have been an increase in engagement with some diverse ethnic minority people, as a result of increased demand for information or particular services.

It should be considered that as a result of the pandemic, the collation of some monitoring data has been delayed, and some national benchmarking publications have been suppressed so it may be some time until the true picture of the impact of the pandemic is fully understood locally.

The Council has taken account of the monitoring data available locally, particularly with regards to monitoring the spread and containment of Covid-19. Monitoring information has also been used to target engagement and messaging to some people within communities which identified to be more likely to be adversely affected.

ⁱ Please note that within this section there are some references to the phrase "Black and Minority Ethnic". This is because this is the title of an historic data set.