Corporate Select Committee

Item No: 8

Report Title: Progress on Equality, Diversity and Inclusion (EDI) Plan and Objectives 2023-2026

Date of Meeting: 15 January 2024

Responsible Cabinet Member: Cllr Margaret Dewsbury (Cabinet Member for Communities & Partnerships)

Responsible Director: Grahame Bygrave (Interim Executive Director for Community and Environmental Services)

Executive summary

[“Better Together, for Norfolk”, the Council’s strategic plan for 2021 to 2025,](#) sets out how the Council is transforming services to ensure financial stability and sustainability – and overseeing economic growth, to create jobs and opportunities and to cherish the environment. A priority in “Better Together, for Norfolk” is “No community left behind”.

The Council publishes a range of documents linked to “Better Together, for Norfolk”, which explain how we are delivering this priority for everyone in Norfolk.

Our [Equality, Diversity and Inclusion Plan and Objectives 2023 to 2026](#) is one of these documents. This report summarises progress to deliver Year 1 of the Plan, which sets out the following objectives:

1. Promote race equality and eliminate racism across our workforce, services and communities.
2. Provide services, information and environments that can be accessed, understood, and used to the greatest extent possible by all disabled people.
3. Promote equality for our LGBTQ+ service users and colleagues.
4. Deliver our EDI transformation plans in response to external inspections, peer and safeguarding reviews.

Progress on most actions is rated green, but there have been delays in progressing race equality training, the Accessible Information Standard and responding to the findings of Adults Peer Review, for reasons set out in the report.

It should be noted that ethnic minority employees continue to provide informal feedback about persistent racism at work.

Therefore, this covering report particularly focuses on race equality. A communications campaign is planned across the workforce in the new year to update employees on their responsibilities to promote race equality at work and the policies, guidance and training available to support them to do this.

Following consideration of this report by Corporate Select Committee, Cabinet will consider progress on 4 March 2024.

Detailed progress on the objectives is set out in **Appendix 1**.

Recommendations

The Corporate Select Committee is recommended to:

1.   Review and comment on the progress to date set out in **Appendix 1.**

2.   To support the Committee to develop a greater understanding of topical and complex issues, consider whether a/some briefing sessions, covering specific topics, would be beneficial for example a specific briefing on the ethnic disparities occurring in youth justice.

3.   Consider the role of the Select Committee in their support of Cabinet to continue to champion race equality in Norfolk.

1.   Background and purpose

1.1   The Cabinet approved the new [EDI Objectives 2023 to 2026](#) on 6 March 2023. The Plan covers services, communities, and workforce.

1.2   As a County Council, our capacity and budgets are limited, so we think carefully about what will deliver results. We prioritise actions based on:

- Our legal responsibilities – gaps in compliance.
- Independent reviews – for example, OFSTED, His Majesty's Inspectorate of Constabulary and Fire & Rescue Services, the Care Quality Commission, and safeguarding reviews.
- Data about how people use our services and any inequalities they experience – and what will achieve the greatest impact.
- Views of different people and communities.

2.   Proposal

2.1   Progress on the EDI Objectives

- This is set out in detail in **Appendix 1.**

2.2 Emerging issues in relation to Objective 1 – Race Equality:

- The focus of the Council's objective to 'promote race equality and eliminate racism' is to ensure that employees have clear information, training and resources to understand how to manage racism at work – this includes:

  o Developing the 'Managing abusive and violent behaviour compliance code' and Bullying and harassment guidance to clearly set out the steps that managers and employees should take to manage racism at work and respond to complex issues – based on feedback from ethnic minority employees and managers.
  o Designing new training with race equality experts to ensure that managers and employees understand which policies to apply, and actions they should take to tackle racism at work.
  o Creating a new dedicated webpage on race equality at work, to make it easier for managers and employees to find what they need.
  o Ensuring that employees are aware of how to access wellbeing support if they are affected by racism (this includes internal well-being services and external charities providing support).
  o Addressing persistent existing, known, racial inequalities in services, identified by the independent whole-council review (for example, relating to the overrepresentation of black young people in looked after and youth offending cohorts and under representation in early help).
  o Undertaking consultation with people working in the care sector in Norfolk, to understand their experiences.
  o Supporting the establishment of a new black women's network for Norfolk, led by volunteers – the first of its kind.

- The backdrop to this work is that ethnic minority employees working with children, adults and families continue to feedback informally to the Council's employee engagement networks that they are affected by racism at work and do not feel this is being addressed effectively.

- It is difficult to quantify the numbers of employees affected, due to the low number of formal reports submitted by employees citing racism as a factor, and a lack of centrally held data. For example:

  o Racism by another employee or line manager is dealt with by the bullying and harassment policy. The policy encourages informal resolution at the first stage. HR are not always informed of issues that are investigated and dealt with at a local level, and where there are central records these are not currently categorised in a way that enables identification of where racism is cited as a factor.

o It should be noted however that the employee survey 2022 indicates that ethnic minority colleagues may be over twice as likely to experience harassment, bullying or abuse from a colleague or manager (8% of white colleagues and between 14-20% of ethnic minority colleagues reported that they had experienced harassment, bullying or abuse in the previous 12 months from a colleague or a manager).

- Racism by service users is dealt with by the Managing Abusive and Violent Behaviour Compliance Code. Racist incidents by service users must be reported on the Council's online incident reporting system - OSHENs. Employees can make a report themselves and the incident will be allocated to their manager to investigate, or employees can ask their manager to complete a report.
- Currently, few reports have been made on OSHENs regarding racist incidents. Communications have been issued to managers via the standard routes, but either this has not been absorbed or employees are not making formal reports.
- There is a range of information available, nationally and locally, that indicates that people tend to under-report racism at work, due to a range of reasons – such as a belief that it will not make a difference, or a worry that it could impact on a person's employment prospects or Visa status (if they are an international worker).
- The Council has agreed a whole-Council motion to promote race equality and tackle racism. Racism will never be tolerated and will be dealt with robustly and swiftly in accordance with agreed policies. **Appendix 1** to this report sets out the actions being delivered to safeguard ethnic minority employees and to eliminate racism.

3. Next steps

3.1 Work will continue to implement the actions set out in **Appendix 1**, in relation to each of the four objectives.

3.2 Work will also take place to prepare for an internal communications campaign in the new year to update managers and employees on their responsibilities to promote race equality and the resources available.

3.3 Corporate Select Committee may wish to consider the role of the committee in continuing to champion race equality in Norfolk.

4. Impact of the Proposal

4.1 Delivery of the objectives set out in Appendix 1 will enable the Council to address the operational challenges reported to Cabinet on 6 March 2023.

5.   Evidence and Reasons for Decision

5.1   The evidence for the proposals is set out in the [report to Cabinet on 6 March 2023 published on the Council's website](#).

6.   Alternative Options

6.1   The Cabinet could consider amendments to the proposed objectives or priorities. Alternatively, it could consider not progressing some priorities. This should be considered against the legal implications summarised below and the operational challenges reported to Cabinet on 6 March 2023.

7.   Financial Implications

7.1   The objectives detailed in this report can be met within existing budgets.

8.   Resource Implications

8.1   Staff:

The objectives detailed in this report can be met within existing resources.

8.2   Property:

The objectives detailed in this report can be met within existing resources.

8.3   IT:

The objectives detailed in this report can be met within existing resources.

9.   Other Implications

9.1   Legal Implications:

The Equality Act 2010 requires authorities to publish equality objectives every four years and to report annually on progress each year. Local authorities have a statutory duty under the Equality Act 2010 to pay 'due regard' to the following when exercising public functions:

- Eliminate discrimination, harassment and victimisation and other prohibited conduct.
- Advance equality of opportunity and foster good community relations.

9.2   Human Rights Implications:

No human rights issues identified.

9.3   Equality Impact Assessment (EqIA):

This report sets out how the Council has given due regard to equality to comply with the Equality Act 2010 including the public sector equality duty. The aim of this is to ensure that the Council continues to take full account of equality, diversity and inclusion when planning and commissioning services and, where necessary, puts actions in place to promote equality and address barriers faced by people with protected characteristics as set out in this report.

9.4   Data Protection Impact Assessments (DPIA):

None required.

9.5   Health and Safety implications:

None identified.

9.6   Sustainability implications:

None identified.

9.7   Any Other Implications:

None identified.

10.   Risk Implications / Assessment

10.1   The Council has monitored potential risks for failure to comply with statutory equality duties. This risk is regularly reviewed by departmental managers.

11.   Recommendations

The Corporate Select Committee is recommended to:

1.   Review and comment on the progress to date set out in **Appendix 1.**

2.   To support the Committee to develop a greater understanding of topical and complex issues, consider whether a/some briefing sessions, covering specific topics, would be beneficial for example a specific briefing on the ethnic disparities occurring in youth justice.

3.   Consider the role of the Select Committee in their support of Cabinet to continue to champion race equality in Norfolk.

12.   Background papers

12.1   See Appendix 1.

Officer contact

If you have any questions about matters contained within this paper, please get in touch with:

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Appendix 1: Equality, Diversity & Inclusion Objectives 2023-2026

Objective 1: Promote race equality and eliminate racism across our workforce, services and communities.

Priority 1: Publish revised guidance explaining all the steps managers and employees should take to tackle racism affecting service users and colleagues.

Rating: Green
Target date: 31 March 2026
Lead: Director of People and Head of EDI

Progress: The Council's **Managing Abusive and Violent Behaviour Code** and **Bullying and Harassment** guidance are being updated, to explain to employees how to report and record racist incidents so that they can be investigated, addressed and monitored.

This includes new information about:

- What to do if you're an employee affected by racism

- What to do if someone you manage is affected by racism

- What to do if you witness racism at work

- What to do if the racism is caused by a service user – if so the importance of following **Guidance on sanctions G630e** which sets out the steps to take including sanctions that can be applied such as the need to contact the service user to explain that racism towards workers is unacceptable and will not be tolerated and the use of formal letters to service users regarding their behaviour.

- What to do if the racism is caused by someone who lacks capacity to understand the impact of their behaviour

- How to report racism, record the incident

- How to support the employee and the risk assessments to put in place to keep the employee safe and to ensure other employees are not unknowingly exposed to racism in the future.

- How employees can access wellbeing support if they are affected by racism (internal well-being services and external charities providing support)

- If you're a manager, making sure your team knows you will support them if racism occurs (don't wait for racist incidents to be reported).

- The importance of establishing positive cultures in teams - for example – championing race equality and respect and dignity for all, diverse perspectives and ideas, listening without judgement.

- Recognising that it can be difficult to talk about racism. If employees feel unable to report a racist incident to their manager they can ask a colleague or a trade union representative to support them, or they can contact HR for advice.

This additional guidance will be published shortly.

A new web page is under development, to bring together all relevant policies and resources for employees on tackling racism, to make this easier for employees to find.

This new web page will also include links to new training on managing racism at work – both e-learning (to explain how to deal with racism and which policies to apply) and face-to-face learning.

See Objective 4 for progress on developing race equality training.

Priority 2: Pilot restorative work with people who exhibit racist behaviour towards our employees.

Rating: Not started
Target date: 31 March 2016
Lead: TBC

Progress: Due to start 1 April 2024.

Priority 3: Undertake analysis to check whether the decisions we make about young people who are Black or from a Gypsy, Roma or Traveller background are equitable.

Rating: Not started
Target date: 31 March 2016
Lead: TBC

Progress: Due to start 1 April 2024.

Priority 4: Review the support available for Black and Gypsy, Roma and Traveller young people who are Looked After or Care Leavers, to check whether we take every opportunity to meet their needs.

Rating: Not started

Target date: 31 March 2016
Lead: TBC

Progress: Due to start 1 April 2024.

Priority 5: Work with independent Black equality experts to examine why Black young people are overrepresented in youth offending.

Rating: Green
Target date: 31 March 2026
Lead: Director of Family Help and High Needs

Progress: Norfolk Youth Justice Service (NYJS) is leading this priority. The latest position is:

- Between January and December 2022, 277 children received an intervention from NYJS.

- Black children in Norfolk continue to be overrepresented on youth justice interventions (in 2022, 5.4% of young people receiving an intervention were black, which is considerably higher than the 1.3% proportion of black children in the school age population)

- Black children were also the most likely group of children to be stop and searched and arrested.

- White children were more likely to be offered diversion prior to receiving a referral order.

To address this disparity, the following actions have been implemented by NYJS:

- Multi-agency group established (courts, probation, housing, NYJS, mental & physical health, Children's Services) to enable public agencies to work together to solve this disparity.

- Racism, discrimination and bias training has been included as part of assessment skills training for Norfolk Youth Justice Services managers and employees.

- Workforce development strategy includes mandatory training and induction (ie cultural competence training)

- Volunteer training includes focus on discrimination and bias.

- Stop & Search session delivered to NYJS practitioners and an intervention tool created.

- Data sharing with Education teams in place to establish a more up to data comparator.

- Case management guidance updated to include relevant ethnicity recording.

- Guided conversations started in routine work reviews.

- Diversity audit carried out.

- Working with interpreters guide developed.

Priority 6: Provide clear guidance to managers on how to promote race equality through policies and procedures and continue to undertake robust checks to ensure that our policies consistently meet agreed standards.

Rating: Amber
Target date: 31 March 2026
Lead: Director of People and Head of EDI

Progress: Each of the Council's departmental management teams is being briefed on the policies and resources available to promote race equality and manage racism at work.

Managers are being asked to rate their services' current level of awareness of the guidance available. This has highlighted a low level of awareness regarding:

- How to support employees affected by racism

- What policies to use to ensure a consistent approach

- Where to record incidents.

In view of this, and following launch of the new guidance, an internal communications campaign will be implemented in the new year, to ensure that all employees understand how to promote race equality and tackle racial discrimination; the relevant policies to apply to ensure a consistent approach and the training available.

Following this, careful monitoring will take place to see if there is an increase in the number of employees feeling supported by the organisation if they are affected by racism.

This action is rated amber, to highlight the importance of ensuring that managers understand the information and resources available.

Priority 7: Increase the representation of ethnic minority people in our public participation forums.

Rating: Amber
Target date: 31 March 2026
Lead: Executive Directors

Progress: A review commissioned by the Cabinet identified that there were low levels of ethnic minority people on the Council's public participation forums.

Work has taken place to identify which forums are in scope. Not all of these groups formally collect monitoring data, so work will take place with the chairs to set a baseline so that the Council can track progress over time, to ensure that public participation forums reflect the diversity of the local population.

In Childrens Services, an audit of participation undertaken in 2023 showed that overall, ethnic minority children and young people were well represented across participation groups and activities. It is noted that the data is not sufficiently detailed to identify whether some specific ethnic minority groups continue to be under-represented and further work is required to ensure that learning from ethnic minority children and young people's participation is being used to inform service design and delivery.

This action has been rated amber, to reflect that not all participations forums reflect Norfolk's diversity.

Priority 8: Increase the visibility of ethnic minority people in marketing materials, so that we are representing all the people we serve.

Rating: Green
Target date: 31 March 2026
Lead: Head of Communications

Progress: The website has been reviewed. There is proportionate representation of ethnic minority people in images used but further work is required to ensure this approach is consistently reflected in specific marketing materials and on social media.

The Council commissioned research with 45 black women in Norfolk in 2022. Participants in the research commended 'the excellent services' during the pandemic: and said the care shown by Norfolk County Council was exemplary and 'the information and advice availability online and on the phone could not be faulted'.

They also said that black women are often portrayed as 'big' and not 'pretty, slim or attractive' in the media.

Priority 9: Monitor whether the ethnic diversity of apprentices reflects the ethnic diversity of the Norfolk population.

Rating: Green

Target date: 31 March 2024
Lead: Head of EDI

Progress: In 2021, no apprentices were from a black, Asian, Arab or Gypsy, Roma or Traveller background.

The ethnic diversity of apprentices has since increased to 3.1%. Overall, there were 203 apprentices 22/23.

On 22 November 2023, Trading Standards service received a Highly Commended Award in the Diversity and Inclusion category of the Charted Trading Standards Institute Awards for work to embed race equality into induction and support materials.

Work will continue to monitor whether the level of ethnic minority apprentices is broadly in line with the Norfolk population.

Priority 10: Engage with black social workers in social care in Norfolk, to understand whether their experiences reflect the national research.

Rating: Green
Target date: 31 March 2024
Lead: Head of EDI

Progress:

- National research indicates that social care employees from ethnic minorities are twice as likely as white colleagues to experience harassment, bullying or abuse from service users or the public.

- The Council commissioned Dr Atuki Turner to complete qualitative research with 45 black women in Norfolk, primarily employed in the social care sector, to better understand their experiences.

- The majority of women interviewed reported experiencing racism in the last year from service users.

- The research report has been finalised and system leaders are being briefed. The report will be shared with all relevant agencies, and adult social care has agreed to lead discussions with care providers to examine how sector leaders can work together to ensure that ethnic minority workers are protected at work, and are supported by their manager or organisation if they are experiencing racism.

Priority 11: Support black women in Norfolk to establish a new volunteer-led black women's network for Norfolk residents.

Rating: Green

Target date: 31 March 2024
Lead: Head of EDI

Progress: In response to requests from residents, the Council has sponsored a range of events to give black women in Norfolk the opportunity to consider whether they wish to lead and participate in a new black women's network. Volunteers have been nominated and a series of events have been well attended. The new volunteer-led network will be called the 'Norfolk Black Women's Chapter'.

Objective 2: Provide services, information and environments that can be accessed, understood and used to the greatest extent possible by all disabled people.

Priority 1: Improve Digital Accessibility through delivering our new road map which sets out the actions we are taking to comply with the Web Accessibility Guidelines AA Standard – and then beyond that to make our digital platforms as usable for as many people as possible.

Rating: Green
Target date: 31 March 2026
Lead: Head of Digital Customer Experience

Progress:

- The roadmap sets out actions to improve the accessibility of the Council's digital offer. It comprises 6 objectives each with a plan of action.

- Currently, the Norfolk County Council website is rated 98.6% compliant with the Website Content Accessibility Guidelines Regulations 2.1AA (Silktide score) - an improvement of 8.1% over 15 months - and the Norfolk Community Directory is 97.8% compliant.

- It is important to note that although this high compliance score has been achieved, users with physical, cognitive, learning or visual disabilities may find it hard to use online forms. For example, small fields may be hard to select; error messages do not sufficiently help users to correct errors or are only available visually.

- In terms of the Council's other digital platforms, a lack of testing and accurate records makes access testing hard to assess. Available information indicates that most platforms have relatively poor accessibility.

- Plans are in hand to migrate the Council's website to a new content management system that will significantly improve the accessibility of online forms and other website content for a wide range of users.

- Training and guidance is being developed to support staff to create and commission accessible content.

Priority 2: Publish revised guidance explaining the steps managers and employees should take (and the resources available to support them) to promote access for disabled people.

Rating: Green
Target date: 31 March 2026
Lead: Head of EDI and Director of People

Progress: Work is underway to create a series of 30-minute learning briefings, to be offered as monthly 'lunchtime seminars' over the next 18 months, filmed so that they are also available 24/7 as a webinar, accompanied by a briefing note uploaded to Oracle Learn/myNet on the following topics:

- How to effectively communicate with and address barriers for D/deaf and hard of hearing people.

- How to effectively communicate with and address barriers for blind and partially sighted people.

- How to effectively communicate with and address barriers for neurodivergent people.

- How to chair or coordinate inclusive **physical** meetings – using the accessibility software and resources available in council premises and committee rooms.

- How to chair or participate in inclusive Teams meetings – using the virtual access resources available (eg captions).

- How to enable good physical access for disabled staff/employees.

- How to effectively induct/onboard a disabled member of staff.

The first briefings will begin by 31 March 2024.

A review of access to work guidance and arrangements is underway which will result in revised guidance being launched in 2024.

It should be noted that Adult Learning recently won a Norfolk Education Award. The judges stated that they were 'extremely impressed with the breadth of education offered by Norfolk County Council, recognising that those who teach on its wide range of programmes are supporting adults with often complex needs".

Priority 3: Continue to implement the Accessible Information Standard to achieve compliance and explore ways to overcome supply issues with formats such as Easy Read.

Rating: Amber
Target date: 31 March 2026
Lead: Director of Community Social Work in consultation with Head of Communications

Progress:

- A review of compliance with the Accessible Information Standard (AIS) has been completed. The review has recommended some improvements.

- The AIS is a legal requirement set out in section 250 of the Health and Social Care Act 2012 for publicly funded adult social care services to make sure that disabled people are given information they can understand. The Standard requires adult social care services to develop a specific, consistent approach to identifying, recording, flagging, sharing, and meeting the information and communication support needs of service users, carers and parents with a disability.

- Adult Social Care has published a procedure on the standards of accessible information that must be used and how staff should make reasonable adjustments to enable people to communicate effectively. The review recommends an update to this procedure to include specific guidance on the provision of particular information formats or types of communication support. It also recommends training be made available.

- One particular challenge identified by the review is that some service users may request information in an 'Easy Read' format or British Sign Language interpretation. However, it is challenging to obtain Easy Read in Norfolk (and other areas of the UK), and the cost is often prohibitively high (eg £700 per document). There is also a low level of British Sign Language Interpreters – particularly those for in-person bookings.

- This reduced availability can impact the timeframes within which Adult Social Care accessible information and communication support can be sourced and provided to service users. This is of particular importance for time-limited or time-critical processes, as highlighted by the Local Government & Social Care Ombudsman.

- To address the supply issues with Easy Read, Adult Social Care is working with Communications, to explore solutions. This is likely to take time to address.

- This action is currently rated amber, to reflect the problems described above in sourcing Easy Read.

Priority 4: Explore whether we can produce accessible templates of our commonly used business documents (eg policies, action plans, contracts, reports, presentations, plans on a page, job descriptions) so that people with sight loss, people who are neurodivergent and/or who have dexterity issues can access this information.

Rating: Green
Target date: 31 March 2025
Lead: Head of EDI

Progress:

- The aim of this action is to ensure that the documents staff routinely use are compliant with the Web Content Accessibility Guidelines (WCAG) Level AA.

- Templates are being developed and a central storage location for these has been identified.

- Engagement with services is taking place to identify further key documents requiring accessible versions.

- Further work will need to be undertaken to address access needs of people who require alternative formats (eg Easy Read).

Priority 5: Deliver our customer experience strategy, to ensure all our customers can communicate with us, particularly people who are Blind, D/deaf or who have learning disabilities.

Rating: Green
Target date: 31 March 2026
Lead: Head of Communities and Customer Service

Progress:

- Extensive work has been undertaken by the Council to provide different customer contact options to make it easy for disabled residents (and non-disabled residents) to contact the organisation. Details are published on the Council's website.

- Consultation has recently taken place with 100+ blind and D/deaf residents, and residents with learning disabilities, to discuss the current level of accessibility and to identify areas for improvement. This has highlighted issues which are being reviewed to identify potential solutions.

- Following consideration of the consultation feedback, the rating of this action will be reviewed.

Priority 6: Continue to deliver our rolling programme of capital improvement, transport, infrastructure and technology – working with disabled people to identify, prioritise and address barriers to access.

Rating: Green
Target date: 31 March 2026
Lead: Director of Property

Progress:

- The Council is implementing several major capital projects (eg King's Lynn and Great Yarmouth Learning Hubs, and the Hunstanton travel hub). Access considerations are being routinely incorporated into all projects.

- Roll out of Changing Places provision across Norfolk continues. There are now 40 changing places toilets installed across Norfolk or being planned/built – funded by the Council or private providers.

- A rolling programme of access audits for all Council premises has commenced, to help identify where access improvements can be made.

- Ongoing support for managers is being provided to identify reasonable adjustments where required and environmental adaptions to meet the needs of disabled users.

Objective 3: Promote equality for our lesbian, gay, bisexual, transgender, questioning (LGBTQ)+ service users and colleagues.

Priority 1: Publish revised guidance for managers and employees explaining the steps they should take if an LGBTQ+ service user or colleague is affected by prejudice or discrimination.

Rating: Green
Target date: 31 March 2026
Lead: Director of People and Head of EDI

Progress: The Council's Managing Abusive and Violent Behaviour Code and Bullying and Harassment guidance are being updated, to explain to employees how to report and record prejudice in relation to sexual orientation, sex and gender identity, so that this can be investigated, addressed and monitored.

This includes new information about:

- What to do if you're an employee

- What to do if someone you manage is affected

- What to do if you witness prejudice at work

- What to do if the prejudice is caused by a service user – if so the importance of following Guidance on sanctions G630e which sets out the steps to take including sanctions that can be applied such as the need to contact the service user to explain that prejudice towards workers is unacceptable and the use of formal letters to service users regarding their behaviour.

- What to do if the prejudice is caused by someone who lacks capacity to understand the impact of their behaviour

- How to report prejudice and record the incident

- How to support the employee and the risk assessments to put in place to keep the employee safe and to ensure other employees are not unknowingly exposed to prejudice in the future.

- How employees can access wellbeing support if they are affected by prejudice.

- If you're a manager, making sure your team knows you will support them if prejudice occurs. Don't wait for incidents to be reported.

- The importance of establishing positive cultures in teams - promoting respect and dignity for all; embracing diverse perspectives and ideas; and listening without judgement.

- Recognising that it can be difficult to talk about prejudice. If employees feel unable to report an incident to their manager they can ask a colleague or a trade union representative to support them, or they can contact HR for advice.

A new web page is under development, to bring together all relevant policies and resources for employees on promoting equality for LGBTQ+ people, to make this easier for employees to find. This new web page will also include links to new training.

Priority 2: Ensure that our business systems can accurately record someone's sex and gender identity – and where there are barriers, work with LGBTQ+ people to identify ways to remedy this.

Rating: Green
Target date: 31 March 2026
Lead: Executive Directors

Progress: The Council aims to record users' sex and gender identity accurately in accordance with the law and users' identity.

Departments have gathered information on the systems they own which require users to provide information on sex or gender identity.

The Council's modern systems tend to give flexibility in recording sex and gender, however older systems may not allow this. If the Council cannot accurately record identity information, there is a risk of causing harm or distress to the user and not complying with case law. Work is taking place to identify and address issues identified.

Priority 3: Carefully consider public-facing services (such as the books and resources we provide in libraries), to ensure that we are meeting the needs of our increasing LGBTQ+ community in the city.

Rating: Not started
Target date: 31 March 2026
Lead: TBC

Progress: This action is due to start 1 April 2025.

Priority 4: Increase the representation of LGBTQ+ people in our public participation forums.

Rating: Green
Target date: 31 March 2026
Lead: Executive Directors

Progress: A recent review commissioned by the Cabinet identified that there were low levels of LGBTQ+ people on the Council's public participation forums.

Work has taken place to identify which forums are in scope. Not all of these groups formally collect monitoring data, so work will begin so that a baseline can be set and the Council can track progress over time, to ensure that public participation forums reflect the diversity of the local population.

Priority 5: Increase the visibility of LGBTQ+ people in our marketing materials, so that we are representing all the people we serve.

Rating: Not started
Target date: 31 March 2026
Lead: Head of Communications

Progress: This action is due to start 1 April 2025.

Objective 4: Deliver our EDI transformation plans in response to external inspections, peer and safeguarding reviews.

Priority 1: Deliver our EDI plan for Norfolk Fire & Rescue Service.

Rating: Green
Target date: 31 March 2026
Lead: Director of Norfolk Fire and Rescue Service

Progress:

- The new Plan for 2023-2026 has been developed and is now published on the Council's website.

- Currently, actions in the plan are rated green.

- His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) has recently inspected Norfolk Fire and Rescue Service, and a significant part of the inspection focused on equality and diversity.

- The final report from HMICFRS is due to be published in the new year and will set out recommendations on EDI.

Priority 2: Deliver our EDI improvement actions in response to Adults Peer Review 2022.

Rating: Amber
Target date: 31 March 2025
Lead: Interim Executive Director Adult Social Care

Progress: The Peer Review highlighted a range of recommendations on EDI. Primarily, these related to the need to ensure that adult social care employees understand the department's priorities on EDI – specifically, what the key barriers are for service users and employees with protected characteristics; how these are being addressed and how employees can contribute to positive workforce culture.

A programme of events to equip staff with this knowledge has been designed and was due to commence in October 2023. However, this was delayed slightly due to capacity issues within adult social care so a new start date is being identified and should commence shortly.

This action is rated Amber, to reflect the importance of completing this work to satisfy Care Quality Commission inspection requirements.

Priority 3: Deliver our EDI improvement actions in response to Recommendation M (tackling racism) Safeguarding Adults Review – Joanna, Jon and Ben.

Rating: Amber
Target date: 31 March 2026
Lead: Interim Executive Director Adult Social Care

Progress: Recommendation M stated that "Although Cawston Park Hospital was not explicitly tolerant of racism, it did not address the fact that [a resident] targeted ethnic minority employees. Hospital staff were not protected from their injurious encounters with him."

In response, the Council agreed a range of actions:

1) **Publish clear policy setting out how managers and workers should respond to racism at work**. This is covered under objective 1 of this plan.

2) **Ensure that social care workers have a system for recording, investigating and addressing racist incidents against employees.** The Council's Incident reporting system (OSHENS) has been adapted to enable employees to record when an incident is racially motivated. This system requires managers to investigate and address the racist incident and record what actions they have taken. By the end of the year, racist incident reports will begin to be reported to departmental management teams.

3) **Develop learning and development for employees to support them to promote race equality and tackle racism at work.** An e-learning offer on promoting race equality at work was developed and was due to be implemented in 2022 but testing with stakeholders identified it required further work. In view of this, new learning objectives and content have been agreed and developed, supported by independent race equality advisors. The training should be available for launch by race equality week in February 2024. A procurement process was undertaken in March 2023 to identify potential providers for face-to-face training on race equality. It was not possible to appoint a provider, so an alternative is being developed. This has created a considerable delay in implementation. Mandatory e-learning is being fundamentally reviewed to reflect feedback from international social workers – relaunch planned by 31 March 2025.

4) **Engage with black workers in social care in Norfolk, to understand whether their experiences reflect the national research.** Reported under Objective 1.

5) **Promoting race equality in safeguarding.** Norfolk Safeguarding Adult's Board is leading work to review data to check whether safeguarding referrals are equitable. This has identified a low level of referrals made for ethnic minority people. The Board will work with stakeholders to understand this disparity and to make sure that the right procedures are in place to keep ethnic minority residents safe.

This action has been rated amber to highlight the delays to implementing the training set out above.

Priority 4: Review our EDI learning and development offer – to help us to deliver the priorities in this plan and equip people with the knowledge they need to tackle racism, homophobia, transphobia, and prejudice in relation to disability, sex and gender.

Rating: Green
Target date: 31 March 2026
Lead: Director of People and Head of EDI

Progress:

- An update has been provided above on work to progress training on race equality and mandatory learning on EDI.

- A range of other e-learning modules are in production, relating to allyship and disability equality.