Appendix 1 to Report SS/12/04





# **Equality and Inclusion**

PoliciesScheme

2004-2005

## Alternative format or language?



If you would like this document in a different format or a different language, please contact the Corporate Equality Representative on:

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# Introduction

This is a two-part document.

The first part covers the Council's policies on equality and inclusion. 'Policies' are statements of values and commitments.

The Policy on Equality and Inclusion is overarching. Underpinning this policy are the Policy on Equality and Inclusion in Service Provision and Equal Opportunities in Employment Policy, specific for those functions of the Council.

In line with the UK legal framework (present and forthcoming) the Council recognises that consideration needs to be given to particular 'equality strands'. The following policies are specific to those strands, but the principles are cross-cutting and could be applied to all areas of equality and inclusion: Disability Equality Policy; Race Equality Policy; Gender and Sexuality Equality Policy; Age Equality Policy; Religion & Belief Equality Policy.

The second part of this document is the Equality and Inclusion Scheme. The Scheme sets out the Strategy and Action Plan for delivering on the Council's policies.

Therefore, this document aims to:

- Set out the key values and principles of Torbay Council
- Address the major implications of these values and principles for practice in Torbay Council
- Provide a framework for future action to increase inclusion, promote equal opportunities and good relations, and eliminate unlawful discrimination within Torbay

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# **Equality and Inclusion Policies**

#### Torbay Council Policy on Equality and Inclusion

This policy is the Council's overarching commitment to equality and inclusion. "The Council" means all its employees and Members, at all levels.

#### **Statement of Commitment**

Torbay Council provides services and employment opportunities to the community. It recognises that the needs and aspirations of that community must come first. It is committed to improving services (through its Charter for Inclusion) and employment opportunities (through its equal opportunities in employment policy).

The Council is committed to being inclusive [as defined below] and will use the Equality Standard for Local Government as a framework for achieving, integrating and maintaining equality and inclusion.

The Council also welcomes its legal duties in relation to Equality and Human Rights legislation and is committed to exceeding them, believing that promoting equality will improve public services for everyone.

The Council will adopt the principles of the Race Relations (Amendment) Act 2000 [as outlined below] and apply this to other equality strands, using the legislation as a framework to promote equality across all areas. Therefore a similar approach will be used to tackle other areas of inequality including disability, gender, sexual orientation, religion/belief and age.

## **Definition of Inclusion**

To be 'Inclusive' means that the Council and other providers will develop their cultures, policies and practices to include *all* people - whatever their abilities or personal circumstances.

An Inclusive Council is one that is fully aware of, and values, its diverse community. It recognises that people have different needs and preferences. It will respect how

people want to be treated and work to alleviate any forms of oppression. It will promote equal opportunities, good relations and eliminate unlawful discrimination in all forms.

It will believe and communicate that:-

- Everyone is included
- Everyone belongs
- Everyone has the right to be treated fairly
- Everyone has the right to equality of access

#### The Law

Under Article 14 of the Human Rights Act Prohibition of Discrimination, people are entitled to be free from "discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status". UK Equality legislation covers: race, disability and sex (gender) in service provision and employment; sexual orientation, gender re-assignment and religion/belief in employment; and will cover age in employment in due course.

#### **Race Relations (Amendment) Act 2000**

The Race Relations Act 1976 as amended by the Race Relations (Amendment) Act 2000 gives public authorities General and Specific duties to promote race equality. The duties apply to all public authorities, including Torbay Council.

Under the General Duty, when carrying out its functions, the Council must give due regard to:-

- Eliminating unlawful discrimination
- Promoting equality of opportunity, and
- Promoting good relations between people

The Specific Duties require the Council to:-

Carry out Equality Impact Assessments on new and existing 'policies' and functions that are relevant, to establish if they disproportionately and adversely affect different groups – this process includes consultation and monitoring

- Take necessary action to meet the general duty where problems are identified
- Publish results of consultation and monitoring
- Ensure access to information and services
- Train employees in relation to equal opportunities and anti-discriminatory practice

The general duty's aim is to make equality a central part of the way the Council works, by putting it at the centre of policy making, service delivery, employment practice, regulation and enforcement.

To meet its duty under the Race Relations (Amendment) Act 2000 Council is required to set out in a 'Race Equality Scheme' how it proposes to fulfil its duties. The Equality and Inclusion Scheme is intended to fulfil that statutory requirement.

#### **General Definitions**

To understand the legislation, policies and scheme it is also important to understand the meaning of discrimination and equality.

#### Institutional Discrimination

The collective failure of an organisation to provide an appropriate and professional service for people because of their colour, culture, ethnic origin, nationality, religion/belief, gender, sexuality, disability, age or other status. It can be seen and detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and stereotyping which disadvantages people.

#### **Direct Discrimination**

A person is treated less favourably or more favourably than others would be on account of their ethnicity/race, disability, gender etc.

#### **Indirect Discrimination**

Where a provision, criteria or practice disadvantages people disproportionately (i.e. fewer people are able to comply with it because of their ethnicity/race, gender etc) and the provision, criteria or practice cannot be objectively justified for a legitimate business aim. Indirect Discrimination does not apply to Disability Discrimination and this is covered by the requirement to provide 'reasonable adjustments':

#### **Reasonable Adjustments - Disability**

Discrimination would arise when reasonable adjustments are not made for a person with a disability. 'Reasonableness' takes account of cost, ability for an adjustment to make a difference, convenience/disruption and is decided in 'case law'. Doing *nothing* on account of a minor cost/minor inconvenience would probably amount to unlawful discrimination.

#### Harassment

Unwanted conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive *environment*.

#### A Discriminatory Incident

Any incident which is perceived to be racist, sexist etc. by the victim or any other person.

#### Providing Equality of Opportunity (eliminating unlawful discrimination)

Treating people how they want to be treated; Decisions that affect people are based upon objective criteria (i.e. not related to the disability, race, gender etc); Decisions, policies, practices, criteria and provisions take account of human diversity.

#### **Promoting Equality and Good Relations**

Taking 'positive action' such as advertising opportunities; Working with and taking initiatives out to the community; Defusing racial or other community tensions; Providing support to increase participation; Making balanced decisions around provision of services and taking steps to ensure that a benefit to one would not be seen as a detriment to another.

## **Disability Equality Policy**

This policy forms part of the Council's overall Equality and Inclusion Policy and is based on principles of good practice and on the requirements of the Disability Discrimination Act 1995. It is specific to the concerns of disabled people.

The Policy recognises people who are disabled as full citizens who have the same right of access to employment and services as people who do not have a disability.

## **Definition of Disability**

The definition of disability within the Disability Discrimination Act is as follows:-

A physical or mental impairment which has a substantial and long-term adverse effect upon his or her ability to carry out normal day-to day activities.

However, this definition focuses upon the individual's impairment and has been rejected by disabled people themselves. Torbay Council therefore supports the Social Model of Disability: -

Disability is not caused by an individual's particular impairment, but by the way in which society creates barriers which prevent disabled people from exercising their rights as full citizens.

The term "disabled people" (under the meaning of the Social Model) will be adopted by the Council as the acceptable term to describe this group, thus including people with physical and sensory impairments, learning disabilities and mental distress. This is consistent with the requirements of the Disability Discrimination Act. The Council recognises the right of disabled people to define themselves as experiencing discrimination as a result of their disability or mental distress rather than their disability status being defined through medical or legal definitions.

The Social versus The Medical Model is at the end of this section.

#### **Principles**

The Disability Discrimination Act duty not to discriminate came into force on 2nd December 1996 and the Council's principles are based upon this fundamental requirement.

The Council:

- Will support services that promote the integration of disabled people into society, and will reflect this principle within its service level agreements and contracts
- Will ensure that in the planning and delivery of its services, Disabled people receive a fair allocation of resources. Each Directorate will develop plans to demonstrate how this will be achieved
- Will promote the empowerment of disabled people in their representative organisations through its grant allocation policies
- Is committed to ensuring disabled children and adults have the right to a choice of mainstream educational provision
- Will ensure that the Council takes a proactive role in promoting the understanding of disability equality issues amongst non-disabled people
- Will ensure that building and planning professionals have the necessary knowledge to include the access needs of disabled people in building design
- Is committed to ensuring that disabled people will receive full and equal consideration throughout the whole recruitment process and resources will be allocated to achieve this (e.g. BSL sign language interpretation), ensuring people with disabilities can compete for Council jobs on an equal basis
- Welcomes applications from disabled people for all vacant positions.
- As a two-ticks award holder, will guarantee an interview for disabled applicants who meet essential criteria for a post (the desirable criteria does not need to be met)
- Is committed to retaining employees who experience disability in post wherever possible, using the current Human Resources polices of the Council. This could be achieved through measures such as reasonable changes to duties, to the working environment or appropriate retraining leading to re-deployment. Throughout the process the views of the individual employee must be considered
- Is committed to providing reasonable and appropriate equipment and support for disabled employees
- Has developed a detailed document on the Employment of Disabled People. This is consistent with the principles contained in this Policy Statement.
- Will undertake to consult disabled people and their representative organisations in policy development and the decision-making process which has, or may have,

implications for disabled people. [Representative organisations are defined as those who have at least 75% of disabled people on their Management Committees]

- Will consult with disabled people on the accessibility of Council buildings
- Will promote access to other aspects of the built environment over which the Council has control or influence
- Will promote access to information, decision making and means of communication through, for example, the use of appropriate language, tape, Braille, interpretation for hearing impaired people, the Internet, videos, minicoms, advocates etc

## The Social Model of Disability vs the Medical Model

SOCIAL		MEDICAL
Social problem	VS	Personal problem
Social integration	VS	Medical care
Social action	VS	Individual treatment
Individual & collective responsibility	VS	Professional help
Environmental adjustment	VS	Personal manipulation
Attitude	VS	Behaviour
Human rights	VS	Care
Social change	VS	Individual adaptation

The Social Model does not intend to convey that medical intervention for individuals is inappropriate or undesirable. For many disabled people, medical interventions are positive and can bring real benefits. However, the Social Model emphases the responsibility that all of society has towards enabling disabled people to exercise their rights as full citizens.

#### Race Equality Policy

This policy forms part of the Council's overall Equality and Inclusion Policy and is based on principles of good practice and on the requirements of Race legislation. It is specific to issues around race and ethnicity.

The Council will provide equal access to employment and services and will not discriminate on the grounds of race, colour, nationality, ethnic origin, cultural background or religion (where the religion is defined as a racial group).

The Council will:-

- Ensure that the Council takes a proactive role in promoting the understanding of race equality issues
- Ensure the rights and needs of Gypsies and Travellers, Refugees and Asylum Seekers will be recognised
- Welcome applications from minority ethnic communities for all vacant positions
- Ensure a Translation and Interpretation service is provided corporately and must be publicised in all reception areas
- Ensure employees are given appropriate training in anti-racist practices and are made aware of their responsibility for the implementation of this policy
- Ensure allegations of racial discrimination and harassment are handled with sensitivity, giving appropriate support to the alleged victim(s), within the context of the definition of institutional discrimination and normal Council policy and procedure
- Support and encourage initiatives which are set up and run by representatives of ethnic and racial groups, and which promote equality of opportunity on racial grounds

#### Gender and Sexuality Equality Policy

This policy forms part of the Council's overall Equality and Inclusion Policy and is based on principles of good practice and on the requirements of Sex (Gender), Sexuality and Gender Re-assignment legislation. It is specific to the concerns of men, women, bi-sexual people, gay men, lesbian women, trans people and people who are undergoing or who have undergone gender re-assignment.

The Council will:

- Ensure that the Council takes a proactive role in promoting the understanding of gender and sexuality equality issues
- Ensure employees are given appropriate training in anti-sexist and antihomophobic practices and are made aware of their responsibility for the implementation of this policy
- Ensure allegations of sex and sexuality discrimination and harassment are handled with sensitivity, giving appropriate support to the alleged victim(s)
- Avoid assumptions that everyone is heterosexual
- Avoid assumptions around gender (for instance, that women are predominantly concerned with childcare, and men are not)
- Ensure men and women are paid the same for doing work of equal value and take account of gender differences when starting pay is agreed (for instance, women are least likely to ask for a higher salary compared to a man)
- Ensure fathers and mothers have an equal say in the care of thier children
- Address under-representation of women and men in different roles through positive action
- Improve progression opportunities for part time workers
- Support all employees in making personal choices about their parenting, caring and work roles
- Value skills developed in the home and community as well as those developed in the workplace
- Work in partnership to create a safer place for women, as well as men
- Acknowledge same sex relationships as important as mixed sex relationships and ensure that this is reflected in policy and practice
- Celebrate International Women's Day as a recognition of the continually rising achievements of women in society
- Confront homophobic attitudes, behaviours and language and promote an understanding of individual rights and attributes
- Encourage a culture of openness around sexual orientation and gender, whilst maintaining privacy rights

## Age Equality Policy

This policy forms part of the Council's overall Equality and Inclusion Policy and is based on principles of good practice and on the requirements of Age legislation and is specific to the concerns of people of all ages and in particular younger and older people.

The Council will:

- Ensure that the Council takes a proactive role in promoting the understanding of age equality issues
- Ensure employees are given appropriate training in anti-ageist practices and are made aware of their responsibility for the implementation of this policy
- Ensure allegations of age discrimination and harassment are handled with sensitivity, giving appropriate support to the alleged victim(s)
- Avoid and address the stereotyping of older and younger people
- Promote older and younger people as active and influential citizens
- Not use age as a criteria to restrict access to service (unless it can be objectively justified)
- Ensure older people are provided with opportunities for employment and life-long learning

#### Religion & Belief Equality Policy

This policy forms part of the Council's overall Equality and Inclusion Policy and is based on principles of good practice and on the requirements of legislation on grounds of race, religion or belief. It is specific to the concerns of people from different faith communities.

The Council will:

- Ensure that the Council takes a proactive role in promoting the understanding of religious equality issues
- Ensure employees are given appropriate training in religion/belief and antidiscriminatory practices and are made aware of their responsibility for the implementation of this policy
- Ensure allegations of religious discrimination and harassment are handled with sensitivity, giving appropriate support to the alleged victim(s)
- Ensure cultural and religious festivals, holidays and rights of worship (in relation to its community and workforce) are acknowledged and publicly recognised across the Council
- Ensure dietary needs are catered for where reasonably practicable
- Not impose dress restrictions that could be discriminatory (unless such restrictions can be objectively justified in terms of meeting a legitimate business aim)
- Ensure leave is not unreasonably withheld from staff who may wish to celebrate cultural and religious festivals
- Provide facilities on request in order for employees, and those in the care of the Council, to meet their commitments to prayer

#### In addition

Employees, Members and service users are expected to respect the beliefs of others and not to dominate or devalue other's belief systems

#### Policy on Equality and Inclusion in Service Provision

This policy is specific to Service Provision.

Torbay Charter for Inclusion		
Torbay Council will enable all to have access to and enjoy high quality services which will enrich their lives and help realise their full potential.		
In order to do this, the Council and its partners will work to:-		
Promote equality, inclusion and good relations Reduce disadvantage and poverty Eliminate unlawful discrimination.		

#### **Statement of Commitment**

At all levels of planning and service provision, the Council will consider all in the community whatever their race/ethnicity, religion and beliefs, gender, sexual orientation, age, disability, language, political or other opinions, or socio -economic status.

In Torbay we have identified the following as our priorities:-

- Those who are 'looked after', by being in the care of the Council
- Those at risk of exclusion (including: people from minority ethnic communities; gypsies and travellers; gay, lesbian, bi-sexual and trans- people; those whose first language is not English; minority religious communities)
- Those who are transient (those new to, or in, the area for a short time)
- Young parents
- Young people who are the carers for others in their family
- Children in need
- People with disabilities
- Those at risk of offending
- Those living in poverty

#### Equal Opportunities in Employment Policy

This policy is specific to Employment.

Torbay Council is committed to addressing employment equality in a positive, practical and meaningful way. Through this policy we will ensure that:-

- Our policies and practices promote equality of opportunity and good relations as well as eliminate unlawful discrimination
- Best practice is achieved in the application of equality in all our recruitment and employment practices
- The obligations imposed by Legislation and Codes of Practice are complied with
- Individuals will be selected for interview, appointed and promoted on the basis of objective criteria, such as job requirements, competencies and performance
- Employees are managed fairly and appropriately, ensuring there is no unlawful discrimination on any grounds in terms of employment activities such as work allocations, consultations and communication, development and training opportunities, appraisals, granting of leave, or grievance, capability and disciplinary matters
- All relevant policies undergo an Equality Impact Assessment and are fully consulted upon with employee representatives
- Managers and employees are aware of their responsibilities and given information, advice, guidance and training on carrying them out
- Our training and development activities will support the Council's policies on Equality and Inclusion and will involve community representatives (such as disabled people or people from minority ethnic communities) in training delivery where possible.
- Our workforce profiles aim to reflect local and national statistics of economically active people
- Positive action is taken to remedy the under-representation of groups of people at all levels and activities in its workforce e.g. with regard to advertising, training, job share, flexible working and career development
- Our employees are protected from harassment and we will provide an effective response to deal with perpetrators. 'The Prevention of Bullying and Harassment' document is available from Human Resources.
- Allegations of unlawful discrimination and harassment are handled with sensitivity, giving appropriate support to the alleged victim(s)
- Disciplinary procedures state that unlawful discrimination and harassment are disciplinary offences.

All employees feel confident to raise any concerns about discriminatory practice and we will respond to any dominance or oppression experienced by employees.

We are committed to ensuring that no employee or potential employee is treated less favourably than another *or* cannot comply with a provision, criteria or practice (where it cannot be objectively justified in proportion to the legitimate aims of the organisation) on the grounds of:-

- Gender
- Sexuality
- Marital status
- Responsibility for dependants
- Race/ethnicity
- Religion/belief
- Disability
- Age
- Any condition or requirement which cannot be objectively justified.

Our Recruitment, Pay and Development Policies will ensure this policy is embedded into core employment activities.

It is a condition of their employment that all Council employees adhere to this policy and all policies concerning Equality and Inclusion. All Job descriptions must state an obligation towards equality of opportunity and anti-discriminatory practice.

The Human Resources Directorate wishes to engage fully with its employees and welcomes suggestions and challenges on how to improve employee relations, policies and practices in the context of Equality and Inclusion.

#### Monitoring

Our employment policies and practices will be kept under review to ensure that they are non-discriminatory and treat individuals equally and fairly. We will involve employee representatives and people with disabilities and from different backgrounds in the monitoring process.

The Human Resources Directorate will monitor and analyse the following in order to ensure effective implementation of this policy, and publish the results of such monitoring annually (within the annual Strategic Plan):-

- All aspects of the recruitment process, including appointments and promotions
- Those involved in disciplinary proceedings
- Those involved in grievances
- Those who apply for training and development opportunities
- Those who receive training and development opportunities
- Financial reward/salary levels
- Those who leave employment

Individuals will not be identified in such monitoring, and monitoring will be in relation to at least the following:- gender, disability, race/ethnicity and age. We will monitor religion/belief or sexuality if it is requested by our employee representatives.

Where analysis of statistical information identifies potential barriers or unlawful discrimination we will review policies and practices, take necessary action which may include training our managers and employees.

All managers are expected to support and assist in the monitoring process.

# **Equality and Inclusion Scheme**

Since September 2002 the Council has operated its Race Equality Scheme. This Scheme incorporates and updates the original Race Equality Scheme, widening its commitment to other strands of equality including: disability; religion/belief; gender and sexuality; age.

This scheme is in two parts: the Strategy and the Action Plan. The Strategy explains *how* we will be putting our equality and inclusion policies into practice. The Action Plan commits time, activities and people to implement the strategy and policies.

We will report on progress annually and update the Scheme at least every three years.

## Equality & Inclusion Strategy

The Council will, in all areas of employment, management, service delivery, policy consideration, resource allocation, planning and review cycles:-

- Accord equally high priority to the promotion of equality, good relations and the elimination of unlawful discrimination as is given to financial, safety and other business priorities
- Redress the effects of segregation, social and economic disadvantage, marginalisation, prejudice and stereotyping of people, particularly through the language and images it uses
- Play its part to increase prosperity and reduce poverty

It will also:-

- Put in place adequate resources, through financial and human resourcing, to improve equality practice
- Through equality impact assessments, identify and quickly remove any practices and procedures that disadvantage people
- Through equality impact assessments, ensure that people's rights of access (in the widest sense) to all services are established and maintained, taking positive action to redress inequalities and helping those groups at risk of exclusion

- Work in partnership with service users/carers and employees, involving them in monitoring, consultation, evaluation and planning, pro-actively seeking views of service users on services provided
- Through effective management and policy, ensure that staff do not abuse power invested in them and challenge any misuse of that power
- Through information and signage, ensure service users are made clearly aware that they do not have the right to refuse a service from particular members of staff on grounds of race/ethnicity/culture, gender, sexuality, age, disability, religion/belief or anything that would fall within an individual's Human Rights

#### Working with others

The Council will:

- Work in close partnership with statutory and voluntary agencies and other partners to promote the social, economic and environmental well-being of all people in the community, aiming to enhance their quality of life and ensuring the needs of all in the community are met
- Work with the local media and other groups on removing attitudes and behaviours in the Torbay community that are racist, homophobic, sexist, ageist, anti-religious (islamaphobia, anti-Semitic etc), or that inflame negative attitudes and behaviours towards people such as transvestites, transgender people, travellers/gypsies, immigrants, refugees, asylum seekers and people with disabilities
- Identify and remove barriers to participation with its partners
- Work with others to ensure the public, service users, employees, consultants, contractors, suppliers and partners (including those in the voluntary and community sectors) are able to go about their daily business free from harassment and unlawful discrimination
- Require the organisations it contracts for services with to develop and implement Equality policies similar to its own, subject to requirements of the 1989 Local Government and Housing Act and Race Relations (Amendment) Act 2000
- Ensure consultants, contractors, suppliers and partners (including those in the voluntary and community sectors) are made aware of the Council's policy on equality
- Support and encourage initiatives which are set up and run by representatives and groups which raise awareness and promote equality of opportunity and antidiscriminatory practice on grounds of race/ethnicity/culture, gender, sexuality, disability, age or religion/belief etc
- Put on events that celebrate diversity within its community

## **Planning for Equality Improvements**

The Equality Standard for Local Government will be used as a basis for the Equality and Inclusion Action Plan. The Standard places considerable emphasis on the establishment of key processes within the Council and these are set out as five levels of achievement:

- Level 1: Commitment to a Comprehensive Equality Policy
- Level 2: Assessment and Consultation
- Level 3: Setting Equality Objectives and Targets
- Level 4: Information Systems and Monitoring against Targets
- Level 5: Achieving and reviewing outcomes

Each year the Council will commit to achieving next level(s) of the standard until Level 5 is reached. Actions required to reach each of the levels are detailed in Appendix 3.

# Policy and Service Delivery - Identifying Which Functions and Policies are Relevant to Equality

The Council has considered which of its existing functions and policies are relevant to promoting equality, good relations and eliminating unlawful discrimination and has prioritised them for Equality Impact Assessments. Functions and policies have been considered relevant if they have implications for or could affect equality. The timetable has been set for identifying what actions the Council needs to take to:-

- Eliminate unlawful discrimination
- Promote equality of opportunity
- Promote good relations

High Priority	– Year 1
Medium Priority	– Year 2
Low Priority	– Year 3

The list of functions and policies, with the year in which they will be reviewed, is contained in Appendix 1. This list will be reviewed every three years. Appendix 2 shows our prioritisation assessment of the functions and policies.

Guidance and pro-forma reports for Equality Impact Assessments are available.

## Assessing and Consulting on Proposed Policies

Policies are often adapted and changed to reflect new laws and changing circumstances. The Council has considered how it can build equality into the policy-making process so that the likely effects of proposed policies on different groups can be assessed. This process is known as Equality Impact Assessment.

All policy reports must state their relevance to equality and demonstrate what steps have been taken to ensure the promotion of equality and good relations and elimination of unlawful discrimination. Where the assessment indicates that there has been or is likely to be adverse impact on good relations, unlawful discrimination or the denial of equality of opportunity it will identify how the policy should be (or has been) revised in the light of the assessment.

This assessment will set a date that will be no longer than three years after the adoption of the policy for a further (monitoring) report that will report on any actual or perceived adverse impact to the promotion of equality and what action has been taken or is proposed.

The equality impact assessment will be reported to the Council's Executive or Overview and Scrutiny Board.

Guidance and pro-forma reports for Equality Impact Assessments are available.

## **Providing Access to Information and Services**

The Council is committed to ensuring that public services work for everyone by making information available about the Council and its services. If people do not know about particular services, are not confident about using them, or meet barriers when they try to use them the Council will be failing in its duty to make its services equally available to everyone and will not be delivering on its own Core Value of providing services which are 'open, responsive, accessible and accountable'.

As part of a review of existing functions and policies, such functions (including the Council's website) must be assessed for accessibility.

Guidelines on Communicating with our Public have been developed to ensure language and other communication support is provided. All front-line services are expected to sign up to the Translation Service and display information posters in their reception areas.

## **Monitoring and Evaluating Equality**

Knowledge of community perceptions, the uptake of services provided by the Council and the impact of its policies on different groups will be of assistance in assessing progress towards equality of opportunity.

Monitoring will help the Council check whether its operations and culture are discriminating against groups of people. Without monitoring data, there is no reliable way of knowing whether unlawful discrimination is taking place, or whether Council policies to prevent or tackle it are working.

We will do this by:

**Challenging** – whether the service meets the needs of all sections of the community **Comparing** – how well our services are performing from the point of view of all groups, against other service providers

**Consulting** – ensuring qualitative information is brought in to the monitoring process **Competing** – ensuring equality objectives are met and sharing best practice

Steering Groups can be established to assess the extent of existing monitoring within each of its functions and policy areas that are relevant to equality and provide recommendations for a corporate approach to effective monitoring. A similar group can review and establish effective and strategic consultation mechanisms.

## **Publishing Results**

The Council will need to be accountable and aims to make sure that monitoring, assessment and consultation activities, and their results are clear and plain to the public.

The Corporate Equality Representative will be responsible for ensuring that policy decisions, summaries of equality impact assessments and outcomes of monitoring/consultation exercises are available.

Information will be available in printed form and accessible formats. Information will be readily available on the Council's website at www.Torbay.gov.uk, published in the annual Best Value Performance Plan (part of the Strategic Plan) and available in Libraries.

The Council will inform the general public about the availability of this material through press releases/advertisements in publications that could best target the relevant groups and through the display of public notices and posters. It will also inform relevant voluntary organisations, community groups and representatives.

## **Managing Complaints and Compliments**

The Council positively welcomes feedback and complaints about any aspect of its work and encourages its staff to identify when things go wrong to help improve services. It also wants to know when it is doing things right so that best practice in service delivery can be shared across the authority.

The Council also seeks to ensure our employees and service users are free from unlawful discrimination and harassment. We will do this by ensuring allegations of unlawful discrimination and harassment are handled with sensitivity through effective policies and procedures, giving appropriate support to the alleged victim(s). We will introduce a Discriminatory Incident Report Form for community-wide use.

The Council has a two-stage complaint procedure that aims to deal with all complaints at the lowest possible level within the organisation but with clear steps if the customer remains dissatisfied.

The Council will introduce a new complaint leaflet which will include an Equality monitoring section to enable the Council to measure the response it receives from different sections of the community and to identify and remove any barriers that might exist. The leaflet and procedure can be made available in a range of languages and accessible formats.

The Council is aware that for some sections of the community who experience difficulty in accessing services, the complaints procedure may be similarly inaccessible. The Council will give people the right to a recognised and trained independent advocate to represent their views to the Council in respect of the services they receive if they are unable to represent themselves. Where necessary the Council will fund the training and provision of independent advocates.

If a member of the community remains dissatisfied having gone through the Council's various procedures the Council will advise them of their right to take the complaint to the Local Government Ombudsman and/or the Commission for Racial Equality, Disability Rights Commission, Equal Opportunities Commission or other recognised body.

The Council will respond constructively to suggestions on how its complaints procedure may be improved and will work hard to make it accessible to all persons who wish to complain.

Employees are provided with a Grievance Procedure and Bullying and Harassment Procedure with which to raise complaints.

## **Equality Representatives**

- All Directors are responsible for ensuring the strategic integration and enforcement of equality compliance into business planning and delivery through target setting. One Director will have an Equality Portfolio to ensure equality is kept on the agenda at Directors meetings.
- One Elected Member will have responsibility for Equality. This Member will report back issues to the Executive.
- The Council will have in place a representative with corporate responsibilities for equality to whom enquiries and complaints can be addressed. This Corporate Equality Representative will be the Council's representative on Community groups such as TORPAT (Torbay Racist Priority Action Team). Through these groups they will build relations with the community (ethnic minorities, disabled people etc) in Torbay and with other organisations. The Corporate Equality Representative will report back issues and progress of the Action Plan to the Directors Management Team.
- All sections of the Council will be made aware of the role of the Corporate Equality Representative so that where there are difficulties in accessing a service or other discriminatory incidents, callers to the Council can be forwarded to this person. Contact details of the Corporate Equality Representative will be widely publicised in Torbay.
- Each Directorate will also have in place a Directorate Equality Representative who will co-ordinate and advise on equality issues within their Directorate. The Directorate Equality Representative will be competent in the equality impact assessment process and will maintain a record of all equality impact assessments carried out in the Directorate.
- The Corporate Equality Representative will co-ordinate an Equality Group of which the Member for Equality, Director with Equality Portfolio and Directorate Equality Representatives will be members. Community groups will also be invited to be part of the group. This group will meet at least quarterly to agree a corporate approach and discuss pre-emptive and responsive matters such as: issues raised by the community, including discriminatory incidents; the progress in effective integration of the equality and inclusion action plan into the business of the

Council; equality impact assessments; best practice. The information collated and recommendations from the Equality Group will be used in the review of the Council's Equality and Inclusion Scheme.

- The Corporate Equality Representative will monitor progress of the programme of review and ensure that equality impact assessments are carried out and published.
- Steering Groups can be used to focus on particular issues such as monitoring, consultation and access. Such groups will also involve the Local Strategic Partnership where appropriate and report to the Equality Group.



#### Equality Representatives: Structure Chart

## Training

The Council has a responsibility to ensure that its staff and Members carry out their roles without discriminating unlawfully and can provide services flexibly and sensitively so that they are responsive to individual needs in the community. It is also committed to ensure that staff with responsibility for equality have the skills they need to promote equality, good relations and eliminate unlawful discrimination.

Staff will receive training in:-

- A general understanding of equality issues that affect public authorities including the concept of "institutional discrimination"
- Anti-discriminatory practice

- Legal duties including the general and specific duties of the Race Relations (Amendment) Act 2000, mainstreaming them, and why they are important
- Diversity Awareness and Customer Focus
- How to carry out equality impact assessments, consultation and monitoring

Learning materials will be made widely available across the whole Council through the launch of a 'Diversity Manual'. The Diversity Manual will include the following: understanding institutional discrimination; legislation; equality impact assessments; diversity in service provision and employment (including language, access, behaviours, diet etc); handling complaints; local and national support and campaign groups; services which provide translation/alternative formats.

Using an Organisational Competencies framework which includes Equality and Customer Focus competencies, we will ensure services are delivered in a professional, respectful, non-discriminatory and non-patronising manner by welltrained and courteous staff.

Diversity Champions will be nominated in all areas of the Council and they will provide 'mentoring' and general guidance to others on equality issues such as accessibility and culture. Information about Diversity Champions will be contained in the Diversity Manual.

The Council's Equality and Inclusion Policies will also be incorporated into the induction process for new staff.

#### Employment

The Council's Equal Opportunities Employment Policy will incorporate its statutory duties and obligations, including that for monitoring.

The Human Resources Strategy, Business Plan and Policy Plan will indicate how and when it will improve equal opportunities, good relations and anti-discriminatory practice.

#### Expected Outcomes

The Outcomes are used as a method for evaluating the success of the Equality and Inclusion Policy and Scheme.

#### **Community Satisfaction**

- Local residents and service users are equally satisfied with the Council as a whole and with individual services and have confidence in the Council
- People see Torbay as an attractive place to live and work. It has a strong sense of community, based on enthusiasm for diversity and respect for difference
- There are no significant differences in service outcomes between groups who use Council services
- The general level of complaints is low and there are no significant differences between complaints from different sections of the community
- The Council caters for a wide variety of needs through well designed and flexible services
- Interest in the Council's consultation exercises has arisen, particularly among minority or 'hard to reach' groups
- The Council makes decisions openly, and is accountable to the community it serves
- The community can access information and services regardless of their culture or race, language, gender, disability, age, sexuality, religion or any other status
- The community feel welcomed and confident when they challenge the Council on equality matters

#### **Staff and Members**

- Elected members are representative of the community
- The Council's workforce is representative of local and national populations (increase in currently under-represented groups)
- Council staff and Members are aware of and understand diversity and associated needs in the communities they serve and know how to meet them
- The Council has a good reputation of being a fair employer
- The are no significant differences in the treatment of staff when reviewed against diversity monitoring data

#### Leadership

- The Leader, Members and Senior Managers have made a public commitment to tackle unlawful discrimination, promote equality and good relations and take a firm and steady lead
- There is a clear direction of travel with clear and achievable outcomes for the Council
- Equality targets are established as part of the RADAR process and driven from the top – down
- Corporate approach to equality and inclusion is achieved
- Business Plans take account of equality matters

#### **Services and Policies**

- Policies and service delivery adopt best practice
- Equality Impact Assessments are carried out for all relevant functions and policies and actions required are built into business plans
- Impact Assessment, including Consultation and monitoring, has become an integral part of policy planning, development and decision making
- Steps have been taken to improve policies and functions
- Results of equality impact assessments, consultation and monitoring are published in appropriate formats and places

#### **Satisfactory Best Value Performance Indicators**

- Levels of the Equality Standard achieved (BV2)
- BV11a (percentage of top 5% of earners that are women)
- BV11b (percentage of top 5% of earners that are from black and minority ethnic communities)
- BV17 (percentage of local authority employees from minority ethnic communities compared with the percentage of the economically active minority ethnic community population in Torbay)
- BV156 (percentage of Council buildings open to the public in which all public areas are suitable for and accessible to disabled people)
- BV53 (intensive home care per 1,000 population aged 65 or over)
- BV54 (older people helped to live at home per 1,000 population aged 65 or over)
- BV74 (satisfaction of tenants of council housing with the overall service provided by their landlord: with results further broken down by i) black and minority ethnic tenants and ii) ethnic categories other than (i))

- BV75 (satisfaction of tenants of council housing with opportunities for participation in management and decision making in relation to housing services provided by their landlord: with results further broken down by i) black and minority ethnic tenants and ii) ethnic categories other than (i))
- BV164 (does the authority follow the Commission for Racial Equality's Code of Practice in rented housing and follow the Good Practice Standards for social landlords on tackling harassment included in Tackling Racial Harassment: Code of Practice for Social Landlords?)
- BV165 (percentage of pedestrian crossings with facilities for disabled people)
- BV174 (number of racial incidents recorded by the authority per 100,000 population)
- BV175 (percentage of racial incidents that resulted in further action )

## Equality & Inclusion Action Plan

ACTION	RESPONSIBILITY	TARGET DATE
Agree template for Committee Report (incorporating Equality Impact Assessment/compliance with Race Relations Amendment Act)	Assistant Managing Director/Director of Social Services ( <i>Director with</i> <i>Equality Portfolio</i> )/Director of Human Resources	April 2004
Ensure all relevant <i>proposed</i> policies undergo an equality impact assessment (using the new Committee Report template)	Directors/Members/Policy Writers	May 2004
Consult on Draft Equality and Inclusion Policy and Scheme	HR Policy Manager (author)	14 <sup>th</sup> May 2004
Formally adopt the Scheme via Executive 18 <sup>th</sup> May (include outcomes of consultation).	Director with Equality Portfolio / HR Policy Manager (author)	18 <sup>th</sup> May 2004
Launch the Equality and Inclusion Scheme & Policies	Director with Equality Portfolio / HR Policy Manager (author)	June 2004
Include Equality and Inclusion Policy in new Induction process	HR Policy Manager	June 2004

		June 2004
Develop and start to deliver training plan including launch of Organisational Competencies which include an Equality competence.	HR Managers: Learning and Development and Policy	(some training already started)
Meet Level 1 of the Equality Standard for Local Government (see Appendix 3)	Directors	June 2004
Implement new Council's Corporate Complaints System which enables diversity monitoring	Assistant Director Corporate Policy and Change Management	June 2004
Establish Member with responsibility for equality issues	Leader	July 2004
Establish Corporate Equality Representative	Director with Equality Portfolio	July 2004
Establish Directorate Equality Representatives (4 <sup>th</sup> Tier) for each Directorate	Directors	July 2004
Set up Equality Group, agree terms of reference and reporting to Directors	Director with Equality Portfolio	August 2004
Improve links with community organisations that represent the equality strands (invite representation at the Equality Group)	Director with Equality Portfolio	August 2004
Equality Group meet and review progress and impact of Equality and Inclusion Policy and Scheme/Equality Standard (including Council's position in relation to the expected outcomes); feedback to Directors or the Executive as appropriate.	Equality Group	Each quarter (ongoing)

Agree specific actions to achieve Level 2 of the Equality Standard by March 2005	Equality Group	By second meeting
Establish Steering Groups to look at: Access (incl. Translation services and DDA building compliance), Strategic Consultation and Strategic Monitoring	Director with Equality Portfolio	ТВС
Move towards "community cohesion" rather than "social inclusion" - consult and start review of the policy & scheme	Corporate Equality Rep	February 2005
Procurement/contracts are equality compliant (in line with requirements of Race Relations Amendment Act and Guidance on Procurement from the CRE)	Assistant Director Project Management	September 2004
Train Equality Representatives in Equality Impact Assessments	HR Policy Manager	September 2004
Launch Diversity Manual & 'Diversity Champions'	HR Policy Manager	September 2004
Buildings are DDA compliant	Assistant Managing Director/Director of Environment	October 2004
All front-line services with public access have signed up to the Translation service and understand how it works. Translation posters are displayed where they can be seen by visitors.	Assistant Directors	December 2004
Establish links with Devon and Exeter Race Equality Liaison Worker for South Devon	Corporate Equality Rep	When in post
Design form and procedure for recording Discriminatory Incidents (suitable for both service users and employees)	Assistant Director Corporate Policy and Change Management	December 2004

Publish Discriminatory Incidents Reporting form widely and make available in all public areas & raise awareness of procedures for reporting discriminatory incidents and the support available across all Directorates	Assistant Director Corporate Policy and Change Management	January 2004
Ensure Business Planning Template/Guidance covers equality action planning and subsequent Business Plans include Equality targets	Director of Corporate Governance	January 2004
Run an event in Torbay to celebrate diversity, if successful, establish as an annual event. Seek funding/community support etc.	Director Torbay Development Agency	ТВС
Produce quarterly equality monitoring report to Directors/Equality Group	Assistant Director Corporate Policy and Change Management (service users) Director of Human Resources (employees)	Each quarter (ongoing)
Produce employment monitoring data and analysis for annual performance review (part of Strategic Plan). Review and agree actions to promote the Council as an Employer of Choice to all sections of the community.	Director of HR with HR Workforce Information Team	May each year
Produce information relating to monitoring and performance in service delivery for annual performance review (part of Strategic Plan)	Assistant Director Corporate Policy and Change Management	May each year

Assistant Director Corporate Policy and Change Management	June each year
Equality Representatives	April 2005
Corporate Equality Rep with Equality Group	April 2005
Corporate Equality Rep with Equality Group	May 2005
Directors	March 2005
Equality Group	April 2005
Directors	ТВС
Equality Group	ТВС
Directors	ТВС
Equality Group	ТВС
Directors	ТВС
	Policy and Change ManagementEquality RepresentativesCorporate Equality Rep with Equality GroupCorporate Equality Rep with Equality GroupDirectorsEquality GroupDirectorsEquality GroupDirectorsEquality GroupDirectorsEquality GroupDirectorsEquality GroupDirectorsEquality GroupDirectors

#### The Equality Standard is in Appendix 4 (the standard must not be reproduced outside of Torbay Council).

# APPENDIX 1: Programme of Review of Existing Relevant Functions & Policies (Equality Impact Assessments)

YEAR 1	YEAR 2	YEAR 3 Completion date for all: April 2005
Chief Executive's Support and Policy	Exchequer and Benefits	Press & PR
Community Safety	Social Services Directorate Support	Emergency Planning
Human Resources	Regeneration and Europe	IT
Children's Services - Prevention	Adult Learning Plan	Law and Admin
Children's Services – Looked After Children	Youth Strategy (DEd)	Finance (Corp)
Children's Services – Direct Provision	Early Years Development & Child Care Plan	Tourism
Children's Services – Care Management & Support	Strategies to Raise Standards (DEd)	Arts and Events
General Housing Function	Appointment of LEA Governors	Local and Strategic Planning
Adult Services – Physical, Sensory	Property Services SLA – Specifically in	Marine Services
Disability and Frailty	Selection of Contractors (DEd)	
Adult Services – Learning Disabled	Pupil Exclusions	Asset Management Plan (DEd)
Adult Services – Mental Health	SEN Strategy (DEd)	Infant Class Size Plan
Adult Services – Substance Misuse	Education Development Plan	School Organisation Plan
Adult Services – Other Vulnerable	Directorate Equal Opportunities Policy	Standing Advisory Committee on
People	(DEd)	Religious Education (DEd)
Adult Services – Care Management	Development and Conservation Planning	Emergency Planning (DEd)
Adult Services – Direct Provision	Enforcement (DEnv)	Financing Scheme for Schools
Research (DStrat)	Cemeteries and Crematorium	Election Rules for Parent, Staff, Teacher
		Governors & Parent Governor
		Representatives
External Funding (DStrat)	Environmental Health	Directorate Health and Safety Policy

		(DEd)	
Pupil Admission	Trading Standards	Work Experience Guidelines for Schools	
	Building Control	Induction of Newly Qualified Teachers	
	CCTV/Corporate Security	Pupil Attendance	
	Sports Development	Pupil Behaviour Support	
	Libraries and Museums	School Transport	
		Research and Information (DEd)	
		Student Support	
		Engineering/Design (DEnv)	
		Highways Maintenance and Network	
		Management	
		Transport Co-ordination	
		Car Parks	
		Estates	
		Facilities Management	
		Beaches and Outdoor Leisure	
		Parks Management	
		Arboriculture	
		Street Cleaning	
		Toilets	
		Waste Management	
		Contracting	

Note: This programme may be reviewed as the Council addresses other unlawful discrimination issues.

#### APPENDIX 2: Prioritisation of Programme of Review of Existing Relevant Functions & Policies

NOTES:

- 1. The 'General Duty', which has been mainstreamed from Race Equality legislation to apply to other equality strands, is that in carrying out our functions we shall have due regard to the need to:- (a) eliminate unlawful discrimination, promote equality of opportunity and (b) promote good relations between persons of different groups.
- 2. 'Function' is defined as the full range of duties and powers. This includes internal and external functions, policy development and service delivery.
- 3. 'Due regard' is defined as giving appropriate weight (priority) to the promotion of equality when carrying out our functions. The weight applied to equality should be in proportion to a function's relevance. We need to decide whether the function or policy is relevant to the general duty to promote equality and if so, how relevant it is.
- 4. 'Relevant' is defined as having implications for (or affecting) equality. A function or a policy will be relevant if it has, or could have, implications of any kind for the Council's general duty to promote race equality.
- 5. 'Evidence' can be from research, consultation, complaints, ethnic monitoring etc.
- 6. Priorities:

**High (year 1)** – those functions that are relevant to all or part of the general duty and for which there is some or substantial evidence that different groups are (or could be) differently affected, or about which there is public concern, should have the highest priority.

**Medium (year 2)** - those functions that are relevant to part of the general duty and for which there is little or some evidence that different groups are (or could be) differently affected, or about which there is public concern, should have medium-term priority.

Low (year 3) – all other functions should be scheduled in the third year. Some functions (eg property services or highways maintenance) may have limited relevance to the general duty – except, of course, in employment – but still have to be addressed and reconsidered every three years.

Key Questions to ask in assessing the relevance of functions and policies

	Is it relevant to the ge	uporal duty?	What is th	e degree of relevance?	<i>If relevant</i>
		-		· · ·	li Televant
	Which of the 3 aspects does it relate to (if any or all):	Is there potential for some groups to be differently affected?	How much evidence do you have?	Is there any public concern that the functions / policies are being operated in a discriminatory manner?	Priority for action:
	<ol> <li>Eliminating discrimination?</li> <li>Promoting EOP?</li> <li>Promoting good relations?</li> </ol>	0 – none 1 – a little 2 – some 3 – a lot	0 – none 1 – a little 2 – some 3 – a lot	0 – none 1 – a little 2 – some 3 – a lot	1 – high (year 1) 2 – medium (year 2) 3 – low (year 3)
Function / Policy	Directorates: Managi Services, Human Res		aging Director Su	pport and Corporate Govern	ance, Financial
Chief Executive's Support and Policy	1, 2, 3	1	1	1/0	1
Press and PR	1, 2, 3	1	1	1/0	3
Community Safety	1, 2, 3	1	1	1/0	1
Emergency Planning	2	1	1	1/0	3
IT	1, 2, 3	1	1	1/0	3
Human Resources	1, 2, 3	2	1	1/0	1
Law and Admin	1, 2, 3	1	1	1/0	3
Finance	1, 2, 3	1	1	1/0	3
Exchequer and Benefits	1, 2, 3	1	1	1/0	2
Function / Policy	Directorate: Environ	nent Services			
Development and Conservation Planning	2	1	2	1	2
Enforcement	1	2	1	1	2
Engineering/Design	0	0	0	0	3
Cemeteries and Crematorium	1, 2	2	1	1	2
Environmental Health	2, 3	1	1	1	2
Trading Standards	2, 3	1	0	0	2
Building Control	2	1	0	0	2
Highways Maintenance and Network Management	0	0	0	0	3
CCTV/Corporate Security	2,3	3	2	0	2
Transport Co-ordination	1	1	0	0	3

Car Parks	0	0	0	0	3		
Estates		1	0	0	3		
Facilities Management	1 1	1	1	0	3		
Sports Development	2	1	1	0	2		
Beaches and Outdoor Leisure	2	1	0	0	3		
	1	1	1	0			
Parks Management	1	1			3		
Arboriculture	1	<u> </u>	0	0	3		
Street Cleaning	1	1	1	0	3		
Toilets	1	1	1	0	3		
Waste Management	1	1	0	0	3		
Contracting	1	1 1 1 0 3					
Function / Policy	Directorate: Learning and Cultural Services						
Access							
Asset Management Plan	-	0	0	0	3		
Infant class size plan	-	0	0	0	3		
School Organisation Plan	-	0	0	0	3		
Community Education							
Adult Learning Plan	1/2/3	1	3	0	2		
Youth strategy	1/2/3	1	3	0	2		
Early Years Development & Child Care Plan	1/2/3	1	3	0	2		
Curriculum							
Strategies to raise standards	1/2/3	1	3	0	2		
Standing Advisory Committee on Religious Education	1/3	1	1	0	3		
Emergency Planning	-	0	0	0	3		
Finance							
Financing Scheme for Schools	2	0	0	0	3		
Governing Bodies							
Appointment of LEA governors	2/3	2	2	2	2		

Election rules for parent, staff,					
teacher governors & parent	2/3	1	1	1	3
governor representatives					
Health & safety					
Directorate Health & safety policy	-	0	0	0	3
Work Experience Guidelines for	<u> </u>			-	-
Schools	2	1	0	0	3
Personnel					
Induction of Newly Qualified Teachers	1/2/3	1	0	0	3
Property					
Property Services SLA –	1/2/2			•	
specifically in selection of contractors	1/2/3	1	0	0	2
Pupils					
Admissions	1/2/3	2	2	2	1
Exclusions	1/2/3	2	1	1	2
Attendance	2	1	1	0	3
Behaviour Support	1/2	0	0	0	3
School Transport	2	0	0	0	3
Special Education Needs					
SEN strategy	2	0	1	0	2
Strategic Management					
Education Development Plan	1/2/3	1	3	0	2
Directorate Equal Opportunities Policy	1/2/3	3	1	1	2

Research & Information	1/2	1	0	0	3			
Student support	2	1	1	1	3			
Library Service								
Museums Service								
Function / Policy	Directorate: Social Services Directorate							
Social Services Directorate Support	1,2,3,	3	0	0	2			
Children's Services – Prevention	1,2,3	3	1	2	1			
Children's Services – Looked After Children	1,2,3,	3	2	3	1			
Children's Services - Direct Provision	1,2,3,	3	2	1	1			
Children's Services – Care Management & Support	1,2,3,	3	1	1	1			
General Housing Function	1,2,3,	3	1	1	1			
Adult Services – Physical, Sensory Disability and Frailty	1,2,3,	3	2	1	1			
Adult Services – Learning Disabled	1,2,3,	3	2	1	1			
Adult Services – Mental Health	1,2,3,	3	2	1	1			
Adult Services- Substance Misuse	1,2,3,	3	2	1	1			
Adult Services – other Vulnerable People	1,2,3,	3	2	1	1			
Adult Services - Care Management	1,2,3,	3	1	1	1			
Adult Services – Direct Provision	1,2,3,	3	2	1	1			
Function / Policy	Directorate: Torbay Development Agency							
Tourism	2	1	1	0	3			
Arts and events	2	1	1	0	3			
Regeneration and Europe	2,3	2	0	0	2			
Local and Strategic Planning	2	1	0	0	3			
Research	1,2,3	1	0	0	1			
Marine Services	2	1	0	0	3			
External Funding	1,2,3,	2	1	0	1			

## APPENDIX 3: Community Profile

[TO BE INCLUDED]

## APPENDIX 4: Equality Standard for Local Government

[TO BE ADDED & ADAPTED FOR TORBAY]