



## **Equality Diversity and Inclusion**

***A scrutiny review of the Cherwell District Council  
Equality Diversity and Inclusion Strategies and Delivery.***

***Report of the Overview and Scrutiny Committee***

**18 March 2025**

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## Executive Summary & Recommendations

The Scrutiny Inquiry was established to review the Council's Equality, Diversity and Inclusion strategies, including, principally, the *Including Everyone* framework. This included reviewing the implementation of the Council's *Including Everyone* framework, reviewing the performance against the Council's Equality, Diversity and Inclusion objectives, review the development of the Council's new Equality, Diversity and Inclusion objectives for 2025-2026 and reviewing the arrangements for engagement and feedback with groups with 'protected characteristics' to help inform policy and approach.

The Overview and Scrutiny Committee re-established this Scrutiny Working Group and membership on 15 October 2024 and agreed the Terms of Reference and Objectives at its meeting on 26 November 2024.

### Members of the Scrutiny Working Group

*This Scrutiny Working Group is made up of members of the Personnel Committee and members of the Overview and Scrutiny Committee.*

*The Members of the Scrutiny Working Group for 2024-2025 were: -*

Councillor Rebecca Biegel - Chairman  
Councillor Gemma Coton – Vice Chairman  
Councillor Barry Wood  
Councillor Lynne Parsons  
Councillor Frank Ideh  
Councillor Dr Chuckwudi Okeke.

### Aims and Objectives

*Aim:*

To review the implementation of the Council's Equality, Diversity and Inclusion strategies (the Including Everyone Framework).

*Objectives:*

- i). To review the implementation of the Council's Including Everyone Framework.
- ii). To review the performance against the Council's Equality, Diversity and Inclusion objectives.
- iii). To review the development of the Council's new Equality, Diversity and Inclusion objectives for 2025-2026.
- iv). To review the arrangements for engagement and feedback with groups with 'protected characteristics' to help inform policy and approach.

This inquiry has focused on Equality Diversity and Inclusion policies and strategy and performance (i.e. relevant to the public sector equalities duties

provided in the Equality Act 2010) and not broader community engagement issues.

The Council's *Including Everyone Framework* outlines the Council's approach to equalities, diversity and inclusion and sets out its vision to providing inclusive services, workplaces and communities, equitable access to services and equality of opportunity.



Cherwell District Council's Equalities, Diversity and Inclusion strategies are set out on the Council's website here:  
<https://www.cherwell.gov.uk/info/5/your-council/1109/equalities-diversity-and-inclusion>

The goals and commitments of Cherwell District Council's *Including Everyone Framework* are set every four years. Sitting beneath this Framework are three annual action plans, that reflect the different ways in which Cherwell Council is working to make its organisation services and communities more inclusive.

The action plans have indicators to help measure progress against the goals. Implementation is being overseen by the Equalities, Diversity and Inclusion Member working group and reporting should align with quarterly business plan monitoring.

### Framework Action Plans

Cherwell Council has three inter-connected strands that help organise its Equalities Diversity and Inclusion (EDI) work and has set goals and commitments against each of these strands. These are tracked and measured in a set of annual action plans, which sit underneath this framework.

Cherwell Council's quarterly performance reports detail progress made to date against the following objectives and measures for each strand:

- Inclusive communities
- Inclusive services
- Inclusive workplace.

It is against the law to discriminate against someone because of a protected characteristic. The nine protected characteristics are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex

- sexual orientation.

This encompasses how the Council plans to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different “protected characteristics” groups.

## **Key Lines of Enquiry**

The Key Lines of Enquiry used to guide this scrutiny inquiry were:

- Q1) What are the Council’s statutory duties, including the Equality Act 2010 and the Public Sector Equality Duty.*
- Q2) What are the Council’s strategies and key objectives delivery of EDI strategies and responsibilities?*
- Q3) What are the arrangements for EDI in Procurement and Commissioning and the Council’s legal responsibilities for services by our partners and contractors?*
- Q4) To what extent and how is the Council working towards achieving a diverse workforce and offering equality of opportunity in employment, recruitment selection, training, and development?*
- Q5) To what extent and how is the Council ensuring that the workplace is free from discrimination, victimisation, or harassment of any kind where staff are treated with respect?*
- Q6) To what extent do the Council policies provide clear guidance to all employees about what is expected of them and what they can expect from us as an employer?*
- Q7) To what extent and how is the Council pro-active in promoting and supporting equality in the workforce?*
- Q8) What Equality training is provided for staff to ensure they are made aware of their rights and responsibilities?*
- Q9) What are the consultation and engagement arrangements relevant to delivery of the Council’s EDI strategies and responsibilities?*
- Q10) How does the Council measure EDI progress and informs the public and our staff about progress on EDI.*

## **Witnesses to the Inquiry**

The Scrutiny Working Group heard evidence from the following witnesses during 2024-2025:

- Councillor Chris Brant – Portfolio Holder for Corporate Services (attending two of the meetings)
- Nicola Riley, Assistant Director Wellbeing & Housing
- Claire Cox, Assistant Director Human Resources
- Shona Ware - Assistant Director of Customer Focus
- Celia Prado-Teeling - Performance Team Leader

- David Cruchley - Senior Youth Partnerships Manager, Oxfordshire Youth.

## **Recommendations**

### ***Equality and Service Delivery***

#### **Recommendation 1**

That a refreshed Council Equality Diversity and Inclusion (EDI) strategy and framework be developed and agreed by the Executive for ratification by full Council in 2025, with refreshed EDI objectives Key Performance Indicators (KPIs) to ensure that they link directly and cross reference to the Council's EDI strategy framework, with KPIs clearly referenced against the delivery of each EDI strand.

#### **Recommendation 2**

That the Council's Equality Diversity and Inclusion (EDI) strategy focus and cross reference directly and specifically to the delivery of the key statutory responsibilities from the Public Sector Equality Duty.

#### **Recommendation 3**

That Equality Diversity and Inclusion (EDI) audits of public facing services be undertaken to ensure maximum accessibility and inclusion.

#### **Recommendation 4**

That the Council review all policies plans and projects to make sure that they have up to date EIA assessments in place.

### ***Equality in Employment***

#### **Recommendation 5**

That the Council further explore opportunities to achieve further accreditation and better publicise the accreditation that the Council already has.

#### **Recommendation 6**

That the Council's recruitment process be reviewed to make it more inclusive and remove irrelevant barriers to recruitment.

#### **Recommendation 7**

That the Council should actively facilitate the creation of staff diversity networks and embed this approach.

## ***Equalities Communications and Engagement***

### **Recommendation 8**

That the Cherwell District Council Consultation and Engagement Strategy 2025 – 2029 include strategies and actions for monitoring response rates among individuals from each of the Protected Characteristics. This should involve incorporating diversity monitoring questions in all consultation and engagement surveys, providing essential evidence for decision-making across all areas of Council policy and service delivery.

### **Recommendation 9**

That a full Equality Diversity and Inclusion (EDI) audit of the Council website and communications be undertaken to ensure that the Council web communications effectively engage with all sections of the community.

## ***Measuring Progress***

### **Recommendation 10**

That the Council Equality Diversity and Inclusion (EDI) objectives / KPIs reflect meaningful outcomes to be delivered for each key strand, as well as measurable outputs and outcomes (metrics) with milestones and implementation dates.

# 1 Introduction

- 1.1. The Equality Act 2010 came into force in October 2010 and legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. The Act covers nine protected characteristics, and these are the grounds upon which discrimination is unlawful. The characteristics are:
  - Age
  - Disability
  - Gender Reassignment<sup>1</sup>
  - Marriage Or Civil Partnership (In Employment Only)
  - Pregnancy And Maternity
  - Race
  - Religion Or Belief
  - Sex
  - Sexual Orientation
- 1.2. The Equality Act 2010 introduced the Public Sector Equality Duty (PSED), which requires that all public bodies, such as the Council, consider all individuals when conducting their day-to-day work, shaping their policies, and delivering services. The Act also outlines the 'protected characteristics' – the specific aspects of identity protected from discrimination.
- 1.3. As an organisation providing services to a diverse community, it is vital for the Council to consider the protected characteristics in all that we do.
- 1.4. The Public Sector Equality Duty requires public bodies, in the exercise of their functions, to have due regard to:
  - Eliminate unlawful discrimination, harassment, victimisation, and other conduct prohibited by the Act.
  - Advance equality of opportunity between people who share a protected characteristic and those who do not.
  - Foster good relations between people who share a protected characteristic and those who do not.
- 1.5. In addition to these 'general' duties, there is also a 'specific' duty. This includes a requirement for public sector bodies to prepare and publish one or more equality objectives at least every four years.
- 1.6. As an employer and deliverer of services, Cherwell Council is committed to eliminate unlawful discrimination, promoting equal opportunities and fostering good relations between people from all communities.

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<sup>1</sup> Before, during and after transition. This wording is the terminology used in the Equality Act; transgender (or Trans) is now the accepted terminology. The Council understands there are many different identities which fall under the Trans umbrella, including identities outside of the gender binary.



## Including Everyone

- 1.7. The Council's Including Everyone framework sets out its commitment for progressing equality. The Strategy and Action Plan outlines its equality objectives, describes how it will fulfil its moral, social and legal obligations and what we will do to make Cherwell a place where people get along with each other and treat each other with dignity and respect.
- 1.8. The Strategy covers inequality in terms of age, disability, gender reassignment (transgender/trans), marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and is aimed at those who live, work in and visit the district, as well as elected Councillors and employees of the Council.

## Why is Equality Important?

- 1.9. As a public service provider, we believe that it is important that the Council recognises that our residents and customers come from different backgrounds; this enables the Council to design and deliver services that meet the needs of the communities we serve. By understanding these differences and encouraging others to do the same, we can improve the quality of life for everyone by ensuring people who live, work, or visit our district are treated fairly, with respect and are given the same chances and opportunities by taking into consideration their different needs.
- 1.10. As an employer, we believe that it is in the Council's interests and in the interests of all who work for the Council that we ensure that every possible step should be taken to ensure that individuals are treated equally and fairly and that decisions in recruitment and selection, training, promotion, and career management are based solely on objective and job-related criteria and that reasonable adjustments are made where feasible.

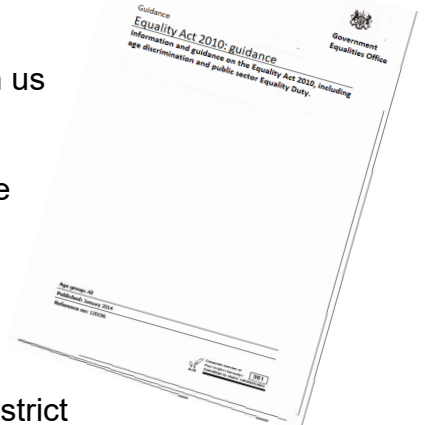
## Public Sector Equality Duty

- 1.11. As part of the Equality Act 2010, public authorities must comply with the Public Sector Equality Duty. The equality duty replaced the previous race, disability and gender equality duties and was developed to extend across all the protected characteristics.
- 1.12. It consists of a general equality duty, supported by specific duties and requires public authorities to consider or think about how their policies or decisions affect people who are protected under the Equality Act. Private organisations and individuals don't have to comply with the duty.
- 1.13. The general duty requires public bodies to have due regard to the need to:
  - Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
  - Advance equality of opportunity between people who share a protected characteristic and those who do not

- Foster good relations between people who share a protected characteristic and those who do not
- In addition, public authorities also have specific duties and must do the following:
- Publish equality information at least once a year to show how they've complied with the equality duty
- Prepare and publish equality objectives at least every four years.

1.14. The publication of a new Equality Strategy will support the Council in meeting the general and specific duties placed on us as part of the Equality Act.

1.15. Having reviewed the Council's strategy and performance, we believe that the Council generally meets the Public Sector Equality Duty (PSED), but its policies tend to be more "non-discriminatory" than proactively anti-discriminatory. We have also suggested that the new strategy could be more clearly aligned to the main statutory requirements of the Equality Act to show how these are delivered by Cherwell District Council.



#### **Equality Act 2010: guidance**

Information and guidance on the Equality Act 2010, including age discrimination and public sector Equality Duty.

<https://www.gov.uk/guidance/equality-act-2010-guidance>

## **2 Equality and Service Delivery**

- 2.1. The Scrutiny Working Group reviewed the Council's equalities diversity and inclusion strategy; - the *Including Everyone Framework* throughout the scrutiny inquiry. This strategic framework outlines and directs how the Council delivers its statutory and organisational priorities for Equality Diversity and Inclusion into practice. The framework has not been updated in four years and is due to be updated, which provided an opportunity for the Scrutiny inquiry to feed into the development of the new framework informally, as well as through the formal report and recommendations to the Executive.
- 2.2. During the scrutiny inquiry the Working Group also reviewed the Council's current Diversity and Inclusion Action plan and the Public Sector Equality Duty (PSED), with presentations and questions and answers from the Assistant Director Human Resources.
- 2.3. A recent organisational restructure has resulted in internal EDI policies being managed by Human Resources, while external EDI policies are overseen by the Housing and Wellbeing department. Nevertheless, the accessibility of

specific services remains the responsibility of the relevant departmental service providers.

### EDI Strategies and Approaches

- 2.4. During this review, the Scrutiny Working Group has researched and considered examples of other equalities diversity and inclusion strategies of other local authorities, to help consider the direction of Cherwell's new strategy. These have included:

- Equality Framework for Local Government, published by the Local Government Association (LGA).
- Kirklees Council Inclusion and Diversity Strategy.
- South Oxfordshire District Council Diversity and Inclusion Strategy.
- Vale of White Horse District Council Diversity and Inclusion Strategy.
- Oxford City Oxford Equality, Diversity and Inclusion (EDI) Strategy.



- 2.5. The current *Including Everyone Framework* was established during a shared service partnership with Oxfordshire County Council, reflecting the organisation's priorities at that time. Since separating from Oxfordshire County Council, the strategic direction of the two organisations has diverged significantly.

### A New Strategy for Cherwell

- 2.6. Having carried out this review of Council's EDI strategy, we are recommending that a refreshed Council EDI strategy and framework be developed to bring it up to date and tailored more specifically to Cherwell and with refreshed EDI objectives that they link directly to the Council's EDI strategy framework.

#### **Recommendation 1**

**That a refreshed Council Equality Diversity and Inclusion (EDI) strategy and framework be developed and agreed by the Executive for ratification by full Council in 2025, with refreshed EDI objectives Key Performance Indicators (KPIs) to ensure that they link directly and cross reference to the Council's EDI strategy framework, with KPIs clearly referenced against the delivery of each EDI strand.**

- 2.7. We have found the current EDI strategy is still generally effective and fit for purpose. Developing a new, tailored EDI strategy specifically for Cherwell should ensure the following:
- The EDI strategy is up to date with legislation
  - The strategy is relevant and tailored to the district, with potential for it to be coproduced by service-users

- The strategy is coproduced by Cherwell staff to represent Cherwell District Council needs and values
- A new strategy would build upon a culture of EDI across the Council and in its service delivery, embedding a culture of EDI across the Council and its service delivery.

2.8. We heard in evidence that the Council generally meets the Public Sector Equality Duty (PSED), but its policies tend to be more “non-discriminatory” than proactively “anti-discriminatory” and that further work was needed to make this developmental step forward.

### A Golden Thread

- 2.9. Having revised other local authority EDI strategies and performance frameworks we have found that many of them are more clearly linked to meeting the specific duties in the Equality Act and the Protected Characteristics, which can make the framework clearer to follow its delivery of those statutory duties.
- 2.10. The Council's EDI strategy should also focus and cross reference directly and specifically to the delivery of the key statutory responsibilities from the Equalities Act 2010 Public Sector Equality Duty. This should include, specifically, how the Council will ensure equality, inclusion and foster good relations between all and each of the protected characteristics groups, for its own staff and for its service uses and in the wider community (community, services workplace).

### **Recommendation 2**

**That the Council's Equality Diversity and Inclusion (EDI) strategy focus and cross reference directly and specifically to the delivery of the key statutory responsibilities from the Public Sector Equality Duty.**

- 2.11. The Public Sector Equality Duty (PSED) requires public authorities to have due regard to how their functions will affect people with different protected characteristics. These functions include their policies, programmes, and services.
- 2.12. Cross referencing to the specific duties of the Equalities Act Protected Characteristics will make it clearer how the Council is delivering and going beyond the Equalities Act 2010 to identify any gaps, through the way it is setting clear objectives and monitoring progress against these.

### EDI Audits

- 2.13. The revised framework, along with specific diversity and inclusion goals, also needs to be agreed in conjunction with the Council's new Corporate Plan in 2025. As corporate priorities and services are aligned to the new Corporate Plan and the refreshed EDI strategy, we are also recommending that EDI audits should be undertaken for all services, in line with the refreshed EDI performance framework.

<b>Recommendation 3</b>
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<b>That Equality Diversity and Inclusion (EDI) audits of public facing services be undertaken to ensure maximum accessibility and inclusion.</b>
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Equality Impacts

- 2.14. Although there is not a specific legal requirement for the Council to undertake an equality impact assessment, we are legally required to demonstrate that we have given 'due regard' to eliminate unlawful discrimination, harassment, and victimisation; advance equality of opportunity and foster good relations. In practice this means that equality considerations still need to be evidenced in our decision-making processes and policies.
- 2.15. Any potential impact on equality should be considered before any key decisions are made and should be integrated into day-to-day policymaking, business planning and other decision-making arrangements. This is particularly relevant when making difficult financial decisions; if we are proposing to stop, reduce or change a service then we must have relevant equalities evidence to justify this.
- 2.16. Reports presented to Council committees and the Corporate Leadership Team include a section on 'Equality Implications.' However, these sections lack explicit Public Sector Equality Duty compliance and do not outline necessary mitigating actions.

Equality Impact Assessments

- 2.17. The Scrutiny Working Group considered the Council's Equalities Impact Assessments Process. The Council carries out Equality Impact Assessments (EIAs) to assess the effects of all new policies and proposals. The Scrutiny Working Group found that whilst the EIA template mostly aligns with the Public Sector Equality Duty, it does not do so explicitly.
- 2.18. We have found that the current application of EIAs is sufficient in understanding the equalities impact for major changes, as this has been undertaken for the previous five years. There are, however, policies plans and services more than five year old that have not been EIA assessed. We are therefore recommending that the Executive agree that all policies plans and projects to make sure that they have up to date EIA assessments in place.

<b>Recommendation 4</b>
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<b>That the Council review all policies plans and projects to make sure that they have up to date EIA assessments in place.</b>
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- 2.19. Reviewing the current EIA template should also ensure it remains fit for purpose.

## EDI Events

- 2.20. Council events could also be more effectively used in support of its EDI engagement, and we believe that the Council should also commit to supporting and delegating the creation and design of events to relevant officers with an EIA process.
- 2.21. ***We believe that the Council should commit to supporting and delegating the creation and design of events to relevant officers with an EIA process.***

## Procurement and Commissioning

- 2.22. During the scrutiny inquiry we considered how equality diversity and inclusion is delivered through the Council's procurement and commissioning arrangements. The Council provides a wide range of services to residents and businesses in the district. In some cases, these are provided directly by the Council, in other cases, by our partners and contractors.
- 2.23. When a supplier provides goods, services or works on behalf of the Council, the ultimate legal responsibility for meeting the requirements of the Equality Act and Public Sector Equality Duty remain with the Council. We believe that it is therefore important to ensure that the Council's equality obligations are part of the terms of a contract so that we know they will monitor the impact on service users and those they employ.
- 2.24. Specifically, we believe that the Council should:
- Communicate its equality diversity and inclusion principles and strategies to all potential contractors and service providers,
  - Ensure contractors and service providers have policies, procedures and practices that do not discriminate and deliver goods, facilities and services that are appropriate and accessible,
  - Provide opportunities for all to be able to bid and be awarded Council contracts from an equal basis; and
  - Monitor the contracts and service arrangements to ensure they are meeting their equality commitments.

## EDI Accreditation

- 2.25. We believe that the Council should explore opportunities to achieve accreditation and better publicise the accreditation that it already has. This could include, for example, neuro-diversity, to ensure that we are meeting high standards of inclusion for people with neurodiverse conditions and making use of their talents.

### **Recommendation 5**

**That the Council further explore opportunities to achieve further accreditation and better publicise the accreditation that the Council already has.**

- 2.26. Achieving accreditation will help the Council's image as an inclusive, and thus attractive, employer.
- 2.27. In achieving accreditation, a stronger EDI culture can be fostered as current staff will feel more supported and bought-in to the EDI mission and prospective staff and candidates will not feel excluded.

### **3 Equality in Employment**

- 3.1. The Council's *Including Everyone* framework pulls together the Council's commitment to equality within the workplace. As part of supporting the delivery of this strategy there are additional guidance documents, focusing on specific elements of equality. These can be added to, as required, through the life of this strategy.
- 3.2. We believe that the Council's HR policies should be clear and pro-active in promoting and supporting equality in the workforce. This includes eliminating bullying and harassment, addressing discrimination, ensuring equality in pay and creating a flexible work-life balance.

#### Equal Opportunities

- 3.3. The Cherwell Council's [Equal Opportunities policies](#) meets its Public Sector Equality Duty requirements by ensuring fair treatment in hiring and promotions. Key points it should include are:
- Commitment to fair recruitment based solely on merit.
  - Proactive outreach to diverse applicant pools at job fairs.
  - Flexible working arrangements to support candidates with additional needs.
  - Reasonable adjustments for disabled employees, including alternative application formats and workplace accommodations.
  - Accessibility measures in the new Property Strategy to ensure all buildings are accessible.
  - Ongoing training and monitoring of employment practices to prevent discrimination.

#### A Diverse Workforce

- 3.4. In evidence to the scrutiny inquiry we heard that the Council is continuing to work towards achieving a diverse workforce and offering equality of opportunity in employment, recruitment selection, training, and development. The Council aims to ensure that the workplace is free from discrimination, victimisation, or harassment of any kind where staff are treated with respect.
- 3.5. We have heard in evidence that the Council already reviews the proportion of staff for each category of Protected Characteristics, and this is reported to Personnel Committee on a quarterly basis. The Council consults staff on key

aspects of accessibility and inclusion and the Council has an Inclusion Champion network.

- 3.6. During the scrutiny inquiry we have considered the range of policies in place for its staff and prospective employees, but also, specifically the [Bullying, Harassment and Discrimination Policy](#) in place to support Public Sector Equality Duty compliance, the Members Code of Conduct, which also outlines expectations regarding anti-bullying, discrimination, and harassment for all Councillors and also Workforce Profile Statistics in reports to demonstrate adherence to Public Sector Equality Duty data requirements.
- 3.7. These policies should support its staff and provide clear guidance to all employees about what is expected of them and what they can expect from the Council as an employer. To achieve this, we are recommending that the Council's recruitment process be reviewed to make it more inclusive and remove irrelevant barriers to recruitment.

<b>Recommendation 6</b>
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<b>That the Council's recruitment process be reviewed to make it more inclusive and remove irrelevant barriers to recruitment.</b>
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- 3.8. Reviewing and streamlining the applications and interview process to better respond to applicants' needs, reduce barriers to recruitment and widen the candidate pool.

#### Equality Training

- 3.9. Equality training is provided for staff to ensure they are made aware of their rights and responsibilities. In particular, all managers should be trained on a regular basis in equalities matters concerning employment. Similarly, there is an expectation that all Members will attend Equality training. Equality issues are an integral part of the Council's training and development programmes, regardless of whether the Council uses internal or external trainers. In addition to the generic equality training, tailored equality training to reflect the needs of specific services will be encouraged, particularly for services engaging with external customers and / or where there is a significant engagement with protected group(s).
- 3.10. We believe that it is important that the Council makes a strong commitment to training and development for all staff. All staff should have equal access to training and development and take positive action where appropriate for those who are underrepresented in our workforce.
- 3.11. The Councils EDI training programme includes Equalities Diversity and Inclusion training for managers and Equalities diversity and inclusion training for all staff and for councillors.
- 3.12. One particular area we have identified that may be of particular focus for incorporation into the Council's training programme is training on neuro-



diversity and this was a full council motion on 21 October 2024. The full motion agreed by Council can be found here:

[Motion on Neurodiversity Meeting of Council, Monday 21 October 2024 \(Item 37.\) https://modgov.cherwell.gov.uk/mgAi.aspx?ID=27375](https://modgov.cherwell.gov.uk/mgAi.aspx?ID=27375)

- 3.13. ***We believe that the Council should introduce training for staff and members on neurodiversity.***
- 3.14. Ideally the Council's EDI training suite should also be complemented with face-to-face training and investigation of EDI topics determined by managers concerns, to include statutory responsibilities and the Council's EDI strategies and policies and objectives.
- 3.15. In addition, we believe that the Council should actively facilitate the creation of staff diversity networks. In our research we have found that staff networks are a key part of the EDI culture at other councils. They facilitate and improve coproduction and keep councils ahead of the curve relating to EDI due to the EDI culture they foster.

<b>Recommendation 7</b>
<b>That the Council should actively facilitate the creation of staff diversity networks and embed this approach.</b>

- 3.16. The Equal Opportunities in Employment Policy satisfies the Public Sector Equality Duty but could do more to support equity in applying to jobs at the organisation. In reviewing the organisation's approach to employment and recruitment, the organisation could attract a more diverse pool of applicants, and successful applicants. Attracting diversity means that all vacancies can be filled by applicants best suited to the role.

An Anti-discriminatory Strategy

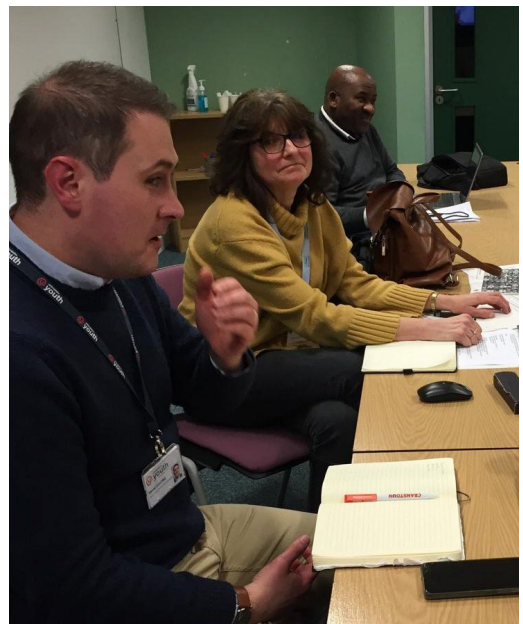
- 3.17. Cherwell Council is moving from "non-discriminatory" to an "anti-discriminatory" strategy and we support this ambition. At the moment, however, we have found that the Council does very little to show an anti-discriminatory stance. In the future, the Council should for example, consider creating a diversity and inclusion calendar. A diversity and inclusion calendar is a tool that lists various cultural, religious, and social events, holidays, and awareness days from different groups. Whilst this may seem like a 'token gesture' to begin with, it could spark momentum for more EDI involvement from staff and service-users.

## 4 Equalities Communications and Engagement

- 4.1. In evidence the scrutiny inquiry has heard that the Council wants to ensure that anyone who accesses Council services either as a resident, visitor, customer, or employee feels well informed about local issues; can get involved, influence local decision making and gets the opportunity to tell the Council what they think about its policies, procedures, service delivery and work with partner organisations.
- 4.2. The Scrutiny Working Group considered the accessibility of Council communications across different services. In the longer term, or as new policies and services are introduced and refreshed, it may be good to review and develop the systems for accessible communications used to engage with residents with reference to the Council's EDI and EIA objectives, as necessary.
- 4.3. It may also be useful for services to reflect upon the way they engage with local residents and service users against these Equality objectives and take opportunities where they arise to think about different sections of our community. Diversity days, workshops or socials are a suitable way of fostering EDI culture by allowing those from protected characteristics to speak with others with shared characteristics.
- 4.4. ***We believe that the Council should commit to supporting and delegating the creation and design of events to relevant officers with an EIA process.***

### Engaging with Young People

- 4.5. One particular group that the Council wishes to engage with more is young people. One of the Council's Equalities KPIs is to "Collaborate with partner organisations to involve young people in volunteering activities and engage with them to undertake active participation in their local communities (KPI EDI1.05.01).
- 4.6. At Quarter 2 we heard that this was behind schedule and that initial discussions with some partners had highlighted the costs and challenges associated with young people undertaking volunteer activity.
- 4.7. In evidence we heard from David Cruchley - Senior Youth Partnerships Manager, Oxfordshire Youth, who provided an overview of the ongoing work carried out by staff and volunteers, as well as the complex growing needs of young people today.



*David Cruchley - Senior Youth Partnerships Manager, Oxfordshire Youth, providing evidence to the Scrutiny Working Group.*

- 4.8. In evidence from Mr Cruchley the Working Group explored three key themes:
- Youth Leadership
  - Youth Voice / Participation
  - Young People Supported Accommodation Service.
- 4.9. He also introduced us to the [Lundy Model of Child Participation](#), a nationally recognised and adopted model of operation through four key concepts:
- Space
  - Voice
  - Audience
  - Influence.
- 4.10. Members posed a range of questions surrounding youth work and organisations within the district and how the Council can help in improving and enriching youth work within Cherwell. It was suggested and agreed that officers look to incorporate the principles of the Lundy model as well as other wellbeing frameworks within the Councils emerging updated Including Everyone Framework.

#### Principles of Engagement

- 4.11. In consideration of the evidence, we have considered overall, we believe that the following principles should inform how the Council will make sure that its engagement activities are flexible, focused, and appropriate for the diverse needs of the communities:
- Plan and co-ordinate consultation and engagement on policy making activities and decision making, the use of resources and, where possible, work collaboratively.
  - Actively encourage involvement from all communities, including those from traditionally under-represented groups/areas.
  - Be open and creative to the most appropriate methods to consult and engage making the experience interesting, relevant, and worthwhile for participants.
  - Be transparent and build trust by communicating results and ensure that the outcomes are used to inform the Council's policies and decision-making processes.
  - Use the information from its engagement activities, alongside other evidence, to inform the design and delivery of effective and efficient services, within our current financial constraints.
  - Build relationships with communities so sustained engagement can be established.

- 4.12. We believe that it is important to highlight and communicate the Council's equalities diversity and inclusion strategies and initiatives to the public and our staff and celebrate achievements. The Council should communicate about progress through:
- An Annual Equality Report
  - Our information and advice services
  - The Council website
  - Media (including social media) for advertising and press releases
  - Through our community network.

#### The Community Engagement Strategy

- 4.13. To ensure consistency, the Council has a separate [Community Engagement Strategy](#), that outlines the principles for consultation and engagement for the Council and provides the Council with a consistent, corporate and agreed approach to how we consult and use the results to inform our policies, strategies and service delivery.
- 4.14. As part of the evidence hearings, we spoke with Shona Ware – Assistant Director of Customer Focus and Celia Prado-Teeling -Performance Team Leader (Customer Focus) on the Council's Cherwell District Council Consultation and Engagement Strategy and its interrelationship with equality diversity and inclusion.
- 4.15. In consideration of engaging with our communities and service users and the way in which this overlaps with delivery of the Council's EDI strategies and engaging with all sections of the population, the Scrutiny Working Group considered the refresh of the Council's Consultation and Engagement Strategy.
- 4.16. We believe that Cherwell District Council's Consultation and Engagement Strategy 2025 – 29 should include strategies and actions for monitoring response rates among individuals from each protected characteristic. This will involve incorporating diversity monitoring questions in all consultation and engagement surveys, providing essential evidence for decision-making across all areas of council policy and service delivery.

#### **Recommendation 8**

**That the Cherwell District Council Consultation and Engagement Strategy 2025 – 2029 include strategies and actions for monitoring response rates among individuals from each of the Protected Characteristics. This should involve incorporating diversity monitoring questions in all consultation and engagement surveys, providing essential evidence for decision-making across all areas of Council policy and service delivery.**

#### Web Accessibility

- 4.17. During the scrutiny inquiry we also considered the Council's website and web accessibility. In modern times the internet has become one of the main ways in which service users and people in general interact and communicate with public services and with each other.
- 4.18. The Council's website, Customer Services, Housing and Revenue and Benefits (among others) already provide different ways for service-users to interact, e.g. documents in large print, interpreters/translations. However, this is only done on a case-by-case basis and is not built into the system. Being proactive, rather than reactive, will make the Council more accessible and more 'anti-discriminatory'.
- 4.19. We heard in evidence that the Council's website meets 88.4% of the Level AA Web Content Accessibility Guidelines (WCAG) and 92.5% of Level A criteria. Plans for the 2024/25 EDI Action Plan include conducting an EIA on the website's accessibility and updating its accessibility section.
- 4.20. The Council website sits below the national local council median for accessibility according to the WCAG AA Success Criteria (around the 43rd percentile). According to the legislation, the Council website is not compliant as it is not fully Level AA.
- 4.21. There is currently no automated system in place to assess staff intranet accessibility against WCAG standards<sup>2</sup>.
- 4.22. We are therefore recommending that a full EDI audit of the Council website and communications be undertaken to ensure that the Council web communications effectively engage with all sections of the community.

#### **Recommendation 9**

**That a full Equality Diversity and Inclusion (EDI) audit of the Council website and communications be undertaken to ensure that the Council web communications effectively engage with all sections of the community.**

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<sup>2</sup> Understanding WCAG 2.2 <https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag>

- 4.23. In the future, the Communications department could consider whether dedicated training is needed for staff who publish web content. In developing a system where staff who publish web content attend mandatory training relating to web content accessibility, the content of the website will, in future, remain ahead of the curve according to guidelines.

## 5 Measuring Progress

- 5.1. The Council measures its progress in delivering its equalities diversity and inclusion strategies and priorities through its *Including Everyone* key performance indicators. The goals and commitments of Cherwell District Council's *Including Everyone Framework* are set every four years.

### EDI Action Plans

- 5.2. Sitting beneath this Framework are three annual action plans that reflect the different ways in which Cherwell Council is working to make its organisation services and communities more inclusive. The action plans have indicators to help measure progress against the goals.
- 5.3. Implementation is overseen by the Equalities, Diversity and Inclusion Member Working Group and reporting should align with quarterly business plan monitoring.
- 5.4. During the Scrutiny Inquiry the Scrutiny Working Group has scrutinised the performance the EDI performance indicators, by reviewing quarterly performance reports with questions to the Portfolio Holder and officers. The Scrutiny Working Group has also reviewed the framework itself and considered to what extent the current performance KPIs and outturn information are effectively measuring the implementation of the Council's Including Everyone Framework EDI priorities.
- 5.5. Cherwell Council has three inter-connected strands that help organise its Equalities Diversity and Inclusion work and has set goals and commitments against each of these strands. These goals are tracked and measured in a set of annual action plans, which sit underneath this framework.
- 5.6. Cherwell Council's quarterly performance reports detail progress made to date against the following objectives and measures for each strand:
- Inclusive communities
  - Inclusive services
  - Inclusive workplace.

## Equality Monitoring

- 5.7. The Council has a requirement to publish equality information at least once a year to show how we have complied with the equality duty. This also makes good business sense as it can help local people assess the Council's performance on equality, the impact our policies and practices have had, tell us who is and isn't using our services; understand why our services may not meet their needs and help us to improve the delivery of our services by identify any data gaps and address any issues. Any monitoring undertaken must be proportionate and relevant and of a benefit to our communities.
- 5.8. The Council monitors its Public Sector Equality Duty compliance through metrics on workforce composition by gender, race, disability, age, and grade, comparing these statistics with local demographics.
- 5.9. The Scrutiny Working Group heard in evidence that the Council is currently reviewing its process for gathering equality data to ensure an accurate understanding of underrepresented communities and identify gaps.
- 5.10. The Scrutiny Working Group has reviewed the Council's Equalities Diversity and Inclusion Performance each quarter, with detailed questions to the Performance Team Leader, Assistant Director of Wellbeing and Housing Services and Assistant Director of HR and maintained an overview of progress, and scrutiny of key indicators that were behind schedule.
- 5.11. During our review it was noted the KPI EDI1.03.01 "Work with partners to promote an ethnically diverse representation at our voluntary sector forum" was listed as "slightly behind schedule". It was also noted the KPI EDI1.05.01 "Collaborate with partner organisations to involve young people in volunteering activities and engage with them to undertake active participation in their local communities" was highlighted "red" and "Behind schedule" in the report.
- 5.12. The report commented that the forum was held on the 4 September and despite increasing the circulation list and invitations, there was little take up from the expanded group and said that more work needed to be done to improve diversity of attendance at next year's forum.
- 5.13. It was suggested that other youth organisations could be involved in seeking out and engaging with young people who may be interested in volunteering. It was noted that Oxfordshire Youth may be invited as an expert witness on this.
- 5.14. The KPI EDI1.05.02 "Raise awareness of the role of a councillor from an EDI perspective within political leaders" was considered and it was asked what the role of a councillor from an EDI perspective was. Members also discussed the implementation of Inclusion Champions and noted that their involvement with the red and amber indicators within the performance report would be beneficial to the progression of EDI goals within the Council.

## Review of the EDI Performance Framework

- 5.15. In reviewing the Council's EDI Performance Framework itself, the Scrutiny Working Group considered if the metrics and indicators used in the performance report were the right ones to measure the implementation and impact of the Council's EDI strategies.
- 5.16. It was noted that the KPIs had no timeframe or delivery target date / review date. One progress description was "Delivering to plan" and it was queried what this meant, and it was felt this wasn't clear enough. It was noted that indicators were listed as 'green' despite not being completed. Officers explained in evidence that the green indicators marked the progress of the actions against where the Council was expected to be operating against the agreed timeframe, rather than fully implemented, but recognised that this may be misleading, especially as there was no implementation timetable. It was agreed that the presentation of information within the performance report as well as the content and targets within the report could be reviewed.
- 5.17. It was also noted that KPIs should be "SMART" (Specific Measurable Achievable and Realistic) and measurable and that the inclusion of milestones with implementation dates and outputs would be useful to help measure and evaluate implementation progress. KPIs that also measure outcomes for the organization or residents may also be more useful to measure impact.

## Meaningful Outcomes

- 5.18. We have recommended that the Council's EDI objectives (KPIs) be refreshed to ensure that they link directly and cross reference to the Council's EDI strategy framework, with KPIs clearly referenced against the delivery of each EDI strand. We are also recommending that the Council's EDI objectives / KPIs reflect meaningful *outcomes* to be delivered for each key strand, as well as measurable outputs and outcomes (metrics) with milestones and implementation dates.

### **Recommendation 10**

**That the Council Equality Diversity and Inclusion (EDI) objectives / KPIs reflect meaningful outcomes to be delivered for each key strand, as well as measurable outputs and outcomes (metrics) with milestones and implementation dates.**

- 5.19. ***We believe that the Council should revise the current data that is captured and consider more effective metrics.***
- 5.20. As it stands, the Council captures a lot of first-order data, e.g. diversity workforce statistics. However, understanding how policies make an impact would be useful in understanding where 'true deficiencies' lie. We suggest that it may be useful if the Executive were to commit to reviewing how data is gathered and what the barriers to gathering effective EDI data are. We believe that the Council should also review how EDI is monitored and what EDI data is captured to ensure it remains fit for purpose.



## Oversight of EDI

- 5.21. We believe that the Council should design and implement an EDI oversight structure (such as EDI Champions), who are able to influence and scrutinise policies, projects and initiatives and support the organisation on its EDI journey at service level.
- 5.22. As with staff networks, having an EDI oversight structure is integral to the EDI culture of many other councils. They keep EDI at the heart of policy decisions and maintain a strong EDI culture within the workforce.
- 5.23. As part of the Scrutiny Working Group's review of community engagement it was agreed officers would reach out to councillors for suggestions of community groups that may be unknown to the Council to enable officers to engage better. It was also suggested that officers could liaise with members to investigate if it may be possible and appropriate to widen representation at the Community Safety Partnership.
- 5.24. In addition to these overall monitoring arrangements, we believe that the Council should aim to produce an annual report to outline progress and seek feedback on how others see and experience progress.
- 5.25. ***It is also requested that each of the scrutiny recommendations agreed by the Executive constitute an objective within the refreshed EDI Action Plan.***

## **6 Conclusion**

- 6.1. The Scrutiny Working Group has completed its review of the Council's EDI strategies, which was the culmination of work carried out previously, but with the inquiry focusing in 2024-2025 not just on oversight of performance but contributing to the review of the EDI strategy for the future.
- 6.2. This review has engaged with some of the key Council officers involved in coordinating the EDI policy framework and performance, as well as the Portfolio Holder for Corporate Services, but has also considered perspective outside of the Council, with evidence from one of the Council's delivery partners engaging with young people, and a review of other Council's EDI strategies and national guidance.
- 6.3. We recognise also though that we were not able to speak to all Council leaders and staff and to all relevant community stakeholders, this being a limited review of a substantial topic. Work will go on to develop the strategies and carry out further engagement further to our scrutiny inquiry. We recognise that EDI is a concern across the Council and across our community and it is for all Council leaders to adopt and implement the strategy to make it work effectively.

- 6.4. Having reviewed the Council's current Equality and Diversity Framework and performance, it has agreed ten recommendations to the Executive. It is hoped that this report and the recommendations will be found to be a useful and constructive contribution to building a refreshed strategy and enhanced EDI framework for the Council, not only as employer but as a community leader.
- 6.5. Many of these recommendations may compliment or go beyond the minimum necessary to fulfil legal duties of local councils relating to EDI. It is envisaged that these recommendations will help shift the Council from 'non-discriminatory' to 'anti-discriminatory' and would help foster an EDI culture that would allow easier implementation of more robust EDI initiatives.
- 6.6. In addition to the main scrutiny recommendations, the report also makes some suggestions, which may be a useful point of reference for taking EDI forward.
- 6.7. The scrutiny recommendations are summarised throughout the report under the main chapter headers and themes addressed in the report:
- Equality and Service Delivery
  - Equality in Employment
  - Equalities Communications and Engagement
  - Measuring Progress.

#### The Scrutiny Process and Next Steps

- 6.8. The EDI Scrutiny Working Group was established to carry out this inquiry and report back to the Overview and Scrutiny Committee, which it is hoped will adopt the report and recommendations. Once the Overview and Scrutiny Committee have agreed the Scrutiny Report and Recommendations, these will be referred to the Executive for consideration and an Executive Response.
- 6.9. There is a two month period within which the Executive should agree its response to the scrutiny report and recommendations. The Executive may agree, reject or amend the scrutiny recommendations made.
- 6.10. The agreed scrutiny recommendations (Executive decisions) made can then be implemented by the Resources and Transformation department and other Council departments as necessary.
- 6.11. After a suitable period of time, the Overview and Scrutiny should request an update on the progress of implementing the Executive Response and decisions made. This is likely to be around one year from when the scrutiny report was agreed, (or whenever might be an appropriate time to review if sooner).
- 6.12. We hope that through this inquiry we will be able to have played a part in helping the Council carry forward its EDI priorities and make a constructive

impact recognising and respecting the differences that make us strong both throughout the Council and throughout our community.

## **Acknowledgements**

We would like to thank the councillors, members and external stakeholders who have taken the time and effort to attend our meetings and present evidence.

In particular we would like to thank Mr David Cruchley - Senior Youth Partnerships Manager, Oxfordshire Youth, who provided valuable insights into community engagement methodologies, which we have learnt from, and which have also contributed to Council learning.

## **The Overview and Scrutiny Committee**

The Overview and Scrutiny Committee is appointed by Cherwell District Council to carry out the local authority scrutiny functions.

### **Membership of the Overview and Scrutiny Committee**

Councillor Dr Isabel Creed (Chairman)  
Councillor Nigel Simpson (Vice-Chairman)  
Councillor Gordon Blakeway  
Councillor John Broad  
Councillor Phil Chapman  
Councillor Grace Conway-Murray  
Councillor Andrew Crichton  
Councillor Frank Ideh  
Councillor Harry Knight  
Councillor Simon Lytton  
Councillor Lynne Parsons  
Councillor Barry Wood

### **Formal Minutes**

Minutes of proceedings are available to view or download from the Council website at <https://modgov.cherwell.gov.uk/mgCommitteeDetails.aspx?ID=116>

### **Committee Staff**

The current staff of the committee are:  
Michael Carr - Interim Principal Officer - Scrutiny and Democratic Lead  
Martyn Surfleet - Democratic and Elections Officer.

### **Contacts**

Email: [democracy@cherwell-dc.gov.uk](mailto:democracy@cherwell-dc.gov.uk)

Cherwell District Council

March 2025

[www.cherwell.gov.uk](http://www.cherwell.gov.uk)