

# **Equality Impact Assessment (EIA)**

## Training and Development Policy

## Equality impact, needs and requirements assessment form

Please use this form to record your findings, proposed actions, equality objectives and targets. Use the guidance notes to help you do the assessment or contact the Equality Standard Project Manager if you need some advice

### About the policy, practice, service or function you are assessing

Name of policy, practice, service or function: **Training and Development Policy**

Assessment team leader name: **Mark Edwards**

Department responsible: **CASS**

Service Area: **Employee Development**

Other members of assessment team:

Name	Position	Area of expertise	Comments
Tariq Iqbal	Training and Development Adviser	Training and Equalities	
Beverley Lambert	Management Learning and Development Manager	Management Development	
Anne-Marie Caseley	Equalities Co-ordinator	Adult Education	
Rose-marie Burton	Training and Development Officer	Training and Environment	

<b>Nicola Hout</b>	<b>Training and Development Assistant</b>	<b>Training and Environment</b>	
<b>Simon Hann</b>	<b>Training and Development Adviser</b>	<b>Plain English, QTS and Leadership Training</b>	

<b>Question</b>	<b>Response/ findings</b>
<p>What are the main aims and objectives or purpose of the policy, practice, service or function that you are assessing?</p>	<p><b>Committed to making sure all employees have the opportunities to develop their skills and knowledge so that they can make the best possible contribution to the Council. The policy explains how the commitment will be met and outlines the practical arrangements that are in place.</b></p>
<p>Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person, team, department, or body – and include any outside organisations who deliver under procurement arrangements</p>	<p><b>Owned and implemented by Employee Development and carried out by Members, Chief Officers, Training Officers within departments, managers, supervisors, personnel and other HR staff and any other employees authorising/requesting training activity.</b></p> <p><b>Also carried out by external training providers when commissioning, procuring and partnering.</b></p>
<b>Question</b>	<b>Response/ findings</b>
<p>Who is affected by the policy, practice, service or function, or by how it is delivered? Such as, who are the external and internal customers, groups, or communities?</p>	<p><b>Every Council employee in need of learning and development. Some employees within partnering organisations will also be affected.</b></p>

<p>What outcomes do we want to achieve, why and for whom? For example, what do you want to be providing, how well, what changes or improvements, and what should the benefits be for customers, groups or communities?</p>	<p><b>To have a developed workforce with the right skills and abilities that consistently improves the services the Council delivers in order to maintain our excellent status.</b></p> <p><b>Meet the Council's priority for 2007 to 2010 in supporting everyone in learning and achieving.</b></p>
<p><b>Question</b></p>	<p><b>Response/ findings</b></p>
<p>What existing or previous inspections of the policy, practice, service or function are there? For example, Best Value Inspections, policy reviews, research into the effects of a policy or practice.</p> <p>What did they tell you?</p>	<p><b>The Council received Investors In People accreditation for the whole Council for the first time in 2005. This was by carrying out an extensive internal review. Next year, for 2008, we are to be externally assessed with the aim for the Council to retain its IIP status.</b></p> <p><b>Environmental Services have achieved ISO 9001 and ISO 140001.</b></p> <p><b>Ofsted Inspection Report 2007 for Adult Learning Service acknowledged a wide range of effective staff development linked to relevant sector, national and curriculum priorities. But the training in equality and diversity needs to be targeted at a greater number of teaching staff in the next academic year, and is mandatory.</b></p>

<b>Identifying potential equality issues and factors</b>	
<b>Question</b>	<b>Response/ findings</b>

What do you already know about the equality impact or need? For example, from research, feedback, consultation or any performance monitoring

**At the Black, Disabled and LGBT Employee Networks conference in April 2007, there were requests for more training course awareness for Council employees. Employee Development will be consulting with the employee network groups to establish where the difficulties in accessing training information lie.**

**Environmental Services promote all of its training within departmental newsletters and payslips.**

**Not everyone has access to IT, so new means of promoting training events are needed.**

**Some managers' not identifying training for their staff through A&D is an issue. Part time staff may not be attending training events within some services. There may be a child care or access issue and needs to be brought into the centre from departments for action.**

**Monitoring arrangements through the Vision system only captures equality monitoring information from March 2007 onwards for training and development. Employees whose request for training has been declined isn't being recorded and monitored for**

impact. Not all departments are using Vision for recording and monitoring training and development activity. Employee Development is investigating what training and development activity is currently being recorded onto the Vision system. Vision needs to capture religion and Sexual orientation too as this is not being done. Bearing this in mind, from the information we have captured, we know that from April 2007 to date, 14,168 training places have been made available and the take-up has been as follows: 70.5% by women, 29.5% by men, 6% by disabled and 16.3% minority ethnic employees. This information does not tell us about the number of employees trained as one employee could have taken several training places.

Few young people work within the council, 5.5% of the workforce employees are less than 20 years old, which automatically impacts training take-up of these groups. We also anticipate leadership and management training will have low attendance from minority ethnic and disabled people in particular, due to the under representation of employees at the higher levels within the Council. Women are most represented.

Question	Response/ findings
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Is there any evidence of higher or lower take up under the policy or practice, or of the service or function for any particular groups? For example, who uses the service, who doesn't and why not?

**Our Best Value indicators tell us there are not enough employees from minority ethnic groups, disabled people and women in managerial positions, top 5% earners. For this reason, take up of management training events especially by disabled people and minority ethnic employees could be low.**

**The Council has piloted positive action programmes for women and minority ethnic groups to enter senior positions to help facilitate more people from these groups enter senior positions.**

**Adverts for Leadership courses also encourage disabled and minority ethnic people to apply due to under representation. Levels of take up need monitoring to assess the impact on these groups.**

**Member development take up is sometimes low.**

**We do not monitor take-up of learning at all levels, for example, on the job, coaching, one to one instructions, seminars and conferences. As part of the A&D or other appraisal process, should departments establish the levels of training activity and measure impact against the six equality groups?**

Take-up of training activity from women reflects the organisation's workforce make-up. Take-up from men in Environmental services is also reflective with it being a predominately male dominated environment.

Need to measure people who have opted out of training and development activity due to operational issues at work, to establish trends of disproportional activity within certain groups or levels of hierarchy.

<p>Have there been any important demographic changes or trends locally? For example is the population changing, and if so, how and what might that mean for the service or function?</p>	<p><b>The Council's Workforce Development Plan highlights an ageing workforce and many senior managers may retire within the next 15 years. There has been a steady increase in capturing data for minority ethnic and disabled employees within the workforce, to compare with Census 2001 data which is also questionable and maybe too out dated by now.</b></p> <p><b>With these changes in mind, we anticipate training activity to increase as the need for skills will be greater than at present, due to new people joining the Council and existing employees securing promotion at the higher levels. The Workforce Development Plan highlights what the Council needs to achieve in order to maintain employment and service delivery. Some of the new initiatives introduced will themselves need impact assessing, for example, career pathways and succession planning.</b></p> <p><b>The increase of European Union will also create an impact within the council. This is mainly to do with ESOL provision for manual employees. HR is currently looking into ESOL training built into induction for new employees.</b></p>
<p><b>Question</b></p>	<p><b>Response/ findings</b></p>

Is there an indication that any of the policies or practices involved with the service or function creates particular problems or difficulties for any groups of customers or communities?

**There may be issues around fully meeting dietary requirements during training events and requests for prayer facilities may increase too, due to demographical changes. Courses are tailored to meet needs, for example, course material in large print, Braille and using BSL signers and interpreters.**

**In saying this, some planned training and development activities may already pose a disadvantage for some groups who opt out, by them having negative past experiences at training events and gaining a view that 'nothing will change' even though access, dietary or other needs 'questions' are being asked by training providers before attending events. Some may feel 'singled out' if they have a request that is 'different' to the norm, especially if for example, prayer time is taken outside of a break from training or catering is provided by an external catering provider just for an individual to meet their dietary need and the power point slides, which do not use imagery, are not dyslexia friendly.**

**Childcare issues for adult learners accessing services may be an issue, with timing of courses needing to reflect the childcare provision times and cost**

	<p>implications that are associated with it. This also affects part-time employees who attend training events outside of their normal working hours.</p>
<p>What information or data exists? For example, statistics, customer feedback, complaints, research, monitoring – who keeps it and can you get hold of it?</p>	<p><b>The Council should keep records of every employee attending training activity whether workshops, full day or qualification course. Data has been input to the Vision system since April 2005, but it is not complete. Databases are also kept for some corporate training events, for information and monitoring prior to 2005, but this does not capture the full equality data.</b></p> <p><b>Every training course should be evaluated. The manager should evaluate the impact of training after each event through A&amp;D. Evaluation information should be logged onto the Vision system and any actions that need following up should be taken on by the manager or training provider. Again, a measure which should be recorded and monitored which is not consistently being applied across the Council.</b></p>
<p><b>Question</b></p>	<p><b>Response/ findings</b></p>

Does any equality or diversity objectives already exist?  
If so, what are they and what is current performance like against them?

**The pilot Positive Action Management Development programmes mentioned earlier and the linkages to BVPI top 5% earners. Currently at 6.5% for m/e and 48.5% for women.**

**Interview skills training to encourage entry into employment for people on the Minority Ethnic and Disabled People's job seekers registers. See impact assessment for recruitment policy on performance.**

**Social Care Services have diversity training for managers and the Induction events at departmental levels have equality sessions within them. Supervision training addresses equality issues.**

**Adult Learning has equality training for tutors and managers and an induction/refresher event each year.**

**Equality and Diversity awareness e-learning pilot for Councillors and top three tiered officers within the Council had good take-up.**

**The training and Development Policy needs to have a policy statement for Equality and Diversity within it.**

	<p>The results of the 2007 employee survey will bring out objectives around training and development for 2008 and beyond.</p>
<p>Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?</p>	<p>This question has been answered earlier.</p> <p>At present we do not know of any cases where training requests have not been approved without justification. If cases are brought to the Council's attention managers are advised accordingly.</p> <p>We have identified an objective to explore the possibility of allowing for an appeals procedure for employees to challenge refusals of training activity. Appeals will be monitored for any impacts and/or trends.</p>

# Collecting the information and data about how the policy, practice, service or function, impacts on communities

Please record your information and data in this table and think about:

what information or data you will need  
using both quantitative and qualitative data  
making sure that where possible there is information that allows all perspectives to be considered  
identifying any gaps in the information/ data and what it can tell you

<b>Data or information</b>	<b>When and how was it collected?</b>	<b>Where is it from?</b>	<b>What does it tell you? You need to consider all six equality strands where you can</b>	<b>Gaps in information</b>
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Customer feedback and complaints	<p>All courses are evaluated and details are entered into the Vision system.</p> <p>Employee survey</p> <p>IIP</p>	<p>Employees and partner delegates</p> <p>Employees</p> <p>External reviewer</p>	<p>Centrally, there is positive impact, as generally events are scored 20 out of 30 - rated as good. Can measure against disability, gender and ethnic origin information, where information exists.</p> <p>Results of training and development. Results out September 2007.</p> <p>Receiving the award verifies the Council's investment.</p>	<p>Input of Evaluation information into the Vision system is not being consistently applied across all departments to establish any trends.</p> <p>Some may not complete the equality statement section.</p> <p>IIP will not be measured using equality information.</p>
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<p>Consultation and community involvement</p>	<p><b>Positive action pilot programmes evaluation shared with Diversity Forums.</b></p> <p><b>Consulting service users and focus groups when designing courses</b></p>	<p><b>Positive action training.</b></p> <p><b>Training providers</b></p>	<p><b>Success of events and communities become more informed about the Council's approach to Equality and Diversity.</b></p> <p><b>Training and development activity takes on board the needs of users.</b></p>	<p><b>Piloted training for women in 2002 and minority ethnic employees in 2006/7. May need to look at other strands for future positive action training.</b></p> <p><b>Need system for monitoring the impact training has on staff and customers.</b></p>
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<p>Performance information including Best Value</p>	<p><b>Customer service and Plain English course BVPI's using performance eye, reporting on a quarterly basis.</b></p> <p><b>Top 5% minority ethnic and women earners BVPI using performance eye, reporting on a quarterly basis.</b></p>	<p><b>Attendance sheets and customer service training feedback forms.</b></p> <p><b>Performance eye and annual workforce statistics.</b></p>	<p><b>Need to establish take-up by equality groups.</b></p> <p><b>Under representation of these groups at senior levels.</b></p>	<p><b>Only age, gender, disability, ethnic origin information may be available through the Vision system.</b></p> <p><b>Not all equality information is electronically captured. Where there is information, action is taken, e.g. positive action management development.</b></p>
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<p>Take up and usage data</p>	<p><b>RRAA 2000 requires the Council to monitor take-up of training activity by racial group and publicise its findings. Currently some information is being collected e.g. NVQ, QTS and corporate training course attendance, but not publicised as this information needs to be extended to cover the six equality strands.</b></p>	<p><b>Data input into the Vision system by departments.</b></p>	<p><b>All training activity needs to be input into the Vision system by departments so information can be pooled centrally, for reporting using the six equality strands. Information on age, gender, race, disability is obtainable.</b></p>	<p><b>Training requests that have not been met may need monitoring consistently, so impact can be measured through the Vision system. Need to incorporate Religion and Sexual Orientation monitoring arrangements too.</b></p>
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Comparative information or data where no local information	<b>Data needs to be compared with the percentage of employees employed at the different levels where training is targeted.</b>	<b>Vision system.</b>	<b>Need to publish results for 2007/8.</b>	<b>Will not cover six strands for the year.</b>
Census, national or regional statistics	<b>Teaching standards measured regionally against National requirements.</b>  <b>Health inequality info sharing</b>	<b>Regional statistics on qualified tutors and teachers</b>  <b>Department of Health</b>	<b>Current tutors have qualification gaps and may have difficulty attaining these by 2010.</b>  <b>Employees are informed about issues affecting certain groups of people. For example heart disease and the Asian communities.</b>	<b>Existing Tutors whose English is not their first language i.e. ESOL and Deaf tutors may not reach the National Standards by 2010 unless additional support is put in place.</b>  <b>None.</b>

Access audits or assessments such as DDA assessments	<b>All training venues need to be fully accessible. Full access audit is needed.</b>	<b>Access Team</b>	<b>Fully accessible building may increase attendance rates of disabled and other employees.</b>	<b>Access needs to encompass wider needs e.g. breast feeding, childcare arrangements and prayer facilities.</b>
Workforce profile	<b>The Council annually reports to the Diversity forums on workforce make up.</b>	<b>HR Operations</b>	<b>Under representation of minority ethnic communities, women and disabled people at certain levels.</b>	<b>Gaps in religion and sexual orientation monitoring as questions not yet being asked.</b>
Where service delivered under procurement arrangements – workforce profile for deliverers	<b>When commissioning training, the DCC procurement policy is followed for tendering purposes.</b>	<b>Procurement team/ departments.</b>	<b>Centrally, evaluations received from organisations commissioned for training are good overall. Where there are issues, these are resolved quickly. Organisations procured meet the policy requirements.</b>	<b>Training and Development Policy needs to highlight procurement arrangements.</b>

## Analysing the information and data and setting equality objectives and targets

Please give your detailed findings in this table

Service or function	Policy or practice	Findings	Which groups are affected and how	Whose needs are not being met and how?
Monitoring take up of training activity.	Need to publish results of training take up under various headings, one day, QTS and workshops.	<p>May have low number of minority ethnic and disabled people due to under representation at the higher levels.</p> <p>May not have information on attendance to external conferences and seminars.</p>	Most groups.	Need to address under representation by establishing development needs for progression. Pilot Positive action initiatives are set up to aid representation at these levels.

		<p>Departments need to monitor training activity as they may target more junior level employees. For example NVQ and basic skills.</p>	<p>There are a higher number of employees from equality groups at the lower levels.</p>	<p>Findings will reveal take up against numbers employed.</p>
<p>Employee development appeals procedure</p>	<p>Do not know if managers are not allowing training activity for certain groups of employees without clear justification.</p>	<p>Employee development appeals procedure may help establish any impact on certain groups.</p>	<p>All.</p>	<p>Appeals monitoring at departmental level will establish needs for age, gender, disability and race. Will need to include religion and sexual orientation monitoring on appeal forms and information updated on the Vision system accordingly.</p>

<p><b>Vision system</b></p>	<p><b>Need to begin recording religion and sexual orientation information. Previous exercise on establishing ethnic origin and disability data has not been easy when asking for returns of forms attached with payslips.</b></p>	<p><b>May not get accurate and reflective data.</b></p> <p><b>New recruitment form will begin to ask the religion and sexual orientation questions. A huge task to collect data on existing employees. May need to use new ways of data collection e.g. updating personal details or monitoring training applications and updating Vision as applications are received.</b></p>	<p><b>All.</b></p>	<p><b>Not sure at this stage.</b></p>

<b>Commissioning training</b>	<b>Introduce guidelines into T&amp;D policy.</b>	<b>To be an objective for future commissioning.</b>	<b>Impact to be established.</b>	<b>Needs will be established.</b>

## Objectives - process, impact or outcome based

Please give your proposed objectives/ targets in this table

<b>Objective/Target:</b>	<b>Make sure there is 100% compliance across all departments of training and development information capturing using the Council's Vision system.</b>
Specific	<b>Yes.</b>
Measurable	<b>Yes. Yes when reporting results.</b>
Achievable	<b>Yes. Yes through Chief Officer Group.</b>
Relevant	<b>Yes. Legal Duty.</b>
Timed	<b>Yes. Annual reporting.</b>

<b>Objective/Target:</b>	<b>Departments and Corporate HR measure training take-up for 2008/09 of employees broken down by disability, gender and race. Information to be provided on workshop attendance, one and two-day courses, leadership courses, QTS, NVQ and Adult Education. Other dimensions will be monitored once arrangements are in place.</b>
Specific	<b>Yes.</b>
Measurable	<b>Yes. Yes against workforce make-up data.</b>
Achievable	<b>Yes. Yes partly - some information may not be available.</b>
Relevant	<b>Yes. Legal Duty.</b>
Timed	<b>Yes. Annual reporting.</b>

<b>Objective/Target:</b>	<b>Review training and Development Policy to take account of Workforce Development Plan and People Strategy and to include an employee development refusal for training appeals procedure into it as well as an equality statement and procurement guidelines.</b>
Specific	<b>Yes. Policy will be more relevant to today's environment.</b>
Measurable	<b>Yes. Will help identify any trends and positive/negative impact on certain groups.</b>
Achievable	<b>Yes. Will have a timeline for completion agreed.</b>
Relevant	<b>Yes. Yes will make the policy current and workable.</b>
Timed	<b>Yes.</b>

<b>Objective/Target:</b>	<b>Incorporate Religion and Sexual Orientation monitoring into Vision.</b>
Specific	<b>Yes. Needs consideration for system purchased.</b>
Measurable	<b>Yes. Will give new data but will be weak in data capture for existing employees.</b>
Achievable	<b>Yes for new data - not sure for existing employees.</b>
Relevant	<b>Yes. For Impact Assessing and be in line with new and emerging legislation.</b>
Timed	<b>Yes. In line for new laws and Impact Assessing.</b>

<b>Objective/Target:</b>	<b>Explore child care provision for employees attending training and development activity outside of normal working hours.</b>
Specific	<b>Yes.</b>
Measurable	<b>Yes. Yes by establishing the feasibility and practicality of provision.</b>
Achievable	<b>Yes. Yes child care needs will be identified.</b>

Relevant	<b>Yes. Legal Gender Duty if women are the main carers.</b>
Timed	<b>Yes. Milestones will be set.</b>

# Monitoring and reviewing - incorporating into performance management

Please summarise your objectives and targets in this table with your proposed monitoring and reporting arrangements

Objective	Planned action	Target performance			Responsible lead officer	Reporting cycle, for example, quarterly
		2007/8	2008/9	2009/10		

<p><b>Departments and Corporate HR measure training take-up for 2008/09 of employees broken down by disability, gender and race. Information to be provided on workshop attendance, one and two-day courses, leaderships courses, QTS, NVQ and Adult Education.</b></p>	<p><i>Bring together departmental representatives and have the importance of the objective agreed, assign tasks and publish results.</i></p>	<p>60% take up</p>	<p>100% take up</p>	<p>100% take up</p>	<p>Mark Edwards</p>	<p>Annually.</p>
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<b>Review training and Development Policy to take account of Workforce Development Plan and People Strategy and include Training and Development appeals procedure for employees into it.</b>	<i>New policy to be agreed by Council Cabinet and introduced to the workforce through the various communication methods employed by the Council.</i>		<i>New policy introduced.</i>		<i>Mark Edwards</i>	<i>Appeals report produced annually.</i>
<b>Incorporate Religion and Sexual Orientation monitoring into the Vision.</b>	<i>New fields entered onto the Vision System.</i>			<i>Fields set up and monitoring begins</i>	<i>Mark Edwards</i>	<i>Annual reporting of training take up by six strands.</i>

<b>Ensure there is 100% compliance across all departments of training and development information capturing using the Council's Vision system.</b>	<i>Chief Officer report and named leads to check on compliance within departments.</i>	60%	100%	100%	<i>Chief Officers</i>	<i>Annual reporting of training activity using various groupings and types of training and development activity..</i>
<b>Explore child care provision for those employees attending training and development activity outside of normal working hours.</b>	<i>Assess if there is a need for this, especially for part time staff and set out the resources needed to make it happen.</i>	<i>Need established/not established?</i>	<i>Established - cabinet report for approval.</i>	<i>Implementation</i>	<i>Council Cabinet</i>	<i>Quarterly reporting of childcare places used.</i>