Introduction

1.1 A requirement of the public sector Equality Duty is that organisations prepare and publish one or more Equality Objectives and review them at least every four years thereafter. The purpose of equality objectives is to help public authorities’ to reach the aims of the general duty which is to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations between those who share protected characteristics and those who do not.

1.2 Kent County Council’s (KCC) current equality objectives were set in 2012. The review of the objectives has been led by the Corporate Equality Group (CEG). The CEG asked KCC services to identify key equality priorities, in line with KCC’s Strategic Statement - Increasing Opportunities, Improving Outcomes. These formed the basis of the new draft Equality Objectives. Whist reviewing the Objectives it was recognised that there is a clear human rights element to some of the services that we deliver, as such, it was felt that human rights should be included as part of the policy.

1.3 The draft Equality and Human Rights Policy Objectives 2016 – 2020 were considered in terms of outcomes and measures i.e. “What difference will this make?” and “How will we measure success?” A new policy framework has been drafted to support the delivery of the equality objectives and ensure clarity in terms of expectations and accountability for equality obligations and outcomes in KCC. This was a key priority and outcome for CEG, staff groups and senior directorate representatives who were involved in early engagement activity.

1.4 The draft Equality and Human Rights Policy and Objectives 2016 - 2020, the Equality Impact Assessment (EqIA) and consultation responses were presented to Directorate Management Teams (DMT’s), the Corporate Management Team (CMT), Policy and Resources Cabinet Committee and then for Key Decision by the Cabinet Member for Corporate and Democratic Services in December 2016.
2 Consultation Process

Early engagement

2.1 Prior to the start of the consultation, a number of early engagement activities were undertaken. This included internal meetings with staff groups representing protected characteristic groups and senior managers and attending external Voluntary and Community Sector (VCS) meetings such as the Maidstone Disability Network. The outcome from early engagement activity helped to influence the content of the policy and the approach that directorates took to identify the objectives that went out to consultation. Key outcomes of the early engagement activities were that:

- **There is a need to focus on areas of non-compliance** - To do this we made the policy clearer and focused on accountability
- **Objectives and statement need to be simpler and clearer** - We sought to make the language and purpose of the policy as clear and simple as possible.
- **Our Strategic Statement, Increasing Opportunities, Improving Outcomes may already define and contain the Equality objectives** - We have carefully considered the strategic outcomes and worked closely with KCC services to understand what the equality priorities are in order to draft objectives that reflect these.
- **We should have a more positive position on Equality** - We have considered the language used and worked to ensure that the objectives are positive serving to build on some of the excellent practice that is already in place.
- **Equality Objectives should make a real difference** - We have looked at existing equality work through the body of EqIAs, annual reports and data. This has provided a strong evidence base for the proposed policy objectives and practice. We also looked at feedback from other consultations.

Methodology

2.2 The draft policy and objectives were published on [www.kent.gov.uk/diversity](http://www.kent.gov.uk/diversity) and publicly consulted on from 12 July 2016 to 30 September 2016. In addition focus groups and community meetings were used to engage protected characteristic groups. KCC staff, managers and Heads of Service were asked to discuss the draft Equality and Human Rights Policy and Objectives 2016 – 2020 in divisional and team meetings and to provide feedback through the consultation. Staff were also encouraged to participate in the public consultation.
2.3 Mixed methods, such as an online and hard copy questionnaire, attending existing service user forums and focus groups were used to ensure that as many people as possible would be able to participate in the consultation. Stakeholder groups were identified through the EqIA.

2.4 It was decided that there would be a focus on qualitative tools as this would provide the opportunity for detailed discussion. Eight focus groups were arranged, four with a representative sample of KCC staff and four for external partners who deliver commissioned services for KCC, the VCS and statutory partners, such as, health organisations and the police.

2.5 The EqIA also highlighted accessibility matters that needed to be addressed in the process and methodology of the consultation. For example, the questionnaire was produced as an Easy Read document which would allow people with low levels of literacy, those who speak English as an additional language, young people and people with learning disabilities to access the consultation. Further the documents published, and the website they were published on was entirely accessible for those who use assistive technology to access the internet and online services. Documents were available in hard copies, alternative formats and other languages on request.

2.6 The KCC Equality and Human Rights Policy and Objectives 2016 - 2020 consultation document was downloaded 370 times. There were 257 downloads of the Easy Read version.

2.7 The consultation provided KCC with the opportunity to hear from the people who are most impacted by the equality objectives. From existing data, annual equality and other performance reports, KCC knows that there are particular groups who are more likely to be adversely impacted by what it does and does not do. For example, disabled people, older people and women have been mostly impacted by changes in the provision of public services since the last equality objectives were set. Through the consultation we aimed to reach these people in order to ensure that they were able to influence the new equality objectives.

2.8 The consultation also helped to raise the awareness of the broader equality agenda to KCC staff and the public.
Promotion

2.9 The consultation was advertised on Kent.gov.uk homepage, KCC’s staff intranet, and TV screens around KCC buildings and on the front page of all KCC Library computer terminals.

2.10 Emails were sent to stakeholder groups to inform them of the consultation. The Community Liaison Officers were asked to promote the consultation at the District meetings they attended.

3. Respondents

Questionnaire

3.1 Overall there were 43 responses to the questionnaire (Appendix 1).

- Four were received on behalf of organisations or KCC directorates
- 39 responses were from individuals

Profile of questionnaire respondents

3.2 Age

![Age Distribution Chart]

41% respondents to the questionnaire were aged 35-49.
3.2 Disability

14% of respondents declared a disability. This is slightly lower than the 17.6% of people who declared a disability in the 2011 census. However it is slightly higher than 7.6% of the population who claim Disability Living allowance, Personal Independence Payment or Attendance Allowance.

3.3 Gender

73% of respondents were female compared to the general population which in the 2011 Census was 51%.
3.4 Marriage and Civil Partnership

55% of respondents declared that they were married or in a Civil Partnership.

3.5 Race
85% of the respondents declared themselves to be White English/White other and White Irish. 17% of respondents were from BME communities, higher than the 6.3% declared in the 2011 Census. 7% chose not to declare Race/Ethnicity.

3.6 Religion and Belief

55% of respondents declared that they had no Religion or Belief. This is significantly higher than 26.7% who declared no religion of belief in the 2011 Census.

3.7 Sexual Orientation
12% of people declared that they were Lesbian, Gay or Bisexual. The category was not measured in the 2011 Census however The Office for National Statistics\(^1\) predict that 1.7% of the national population are LGB with young adults (16 to 24) more likely to declare that they are LGB than older groups.

**Focus groups / meetings**

3.8 A total of eight focus groups were arranged. The meetings were held across the County in order to allow as many people as possible to attend.

- 33 people attended
- An invitation to the Kent Race Equality Council was received- which was attended by approximately 25 people.

Invitations were sent to all groups known to KCC. Further invitations were sent to staff though directorate management teams.

**4. Responses**

4.1 The response from the focus groups and the meetings are combined with feedback from the questionnaire below. However where percentages are quoted, they are taken only from the questionnaire.

**Section 1**

4.2 Section 1 set out KCC’s commitment to Equality and Human Rights as well as explaining the key principles, drivers and duties that inform this responsibility. It also explained what we will do to make sure that we fulfil our responsibilities.

The 3 questions were:

- Is the statement in section 1 clear?
- Does the statement in section 1 adequately inform you what KCC’s legal duties are?
- Do you have any other comments on the statement in section 1?’

4.3 95% of respondents agreed that the statement was clear. Respondents were also asked if the statement adequately expressed what KCC’s legal duties were in relation to the Equality Act. 91% agreed that it did. However a number of focus group members felt that the statement could be made simpler. Comments included:

---

“The first and second paragraph are full of terminology which could be broken down. Also many of the sentences are very long. I feel a public consultation document should be easy to read, understand by everyone. Therefore, it needs to be concise and clear.”

“Fostering relationships and knowledge between existing generations should be high on the agenda and will lead to a solid understanding from the younger generations which will help them make wise choices in the future.”

“can we not just use the easy read version”

“Not dumbing down but make it meaningful”

Section 2 – How will KCC implement the policy?

4.4 Respondents were asked if how KCC intended to make sure its public sector Equality Duty was met in its day to day work was clearly expressed. 98% agreed that it had been. Some were concerned about the lack of structures that should be in place to support some of the activity that would help to support equality outcomes such as engagement forums. Comments included:

“This section flows a lot better, and the general tone is more engaging, as it clearly differentiates in how each employee is responsible to behave towards others. Also, the protected characteristics and employees can expect dignity is explained well.”

“needs to be more than words”

“We have lost a lot of forums… we have lost a lot of diversity”

“Can we build explicit terms into contracts?”

Section 3 – Accountabilities

4.5 Respondents were asked if the accountability structures for the implementation of the Equality Duty in KCC were clear. 91% agreed that the structures were clear. 56% of respondents felt that there were others who had a role in ensuring equality outcomes in Kent. For example, Kent residents and the VCS. Comments included removing acronyms and jargon that would make no sense to people who work outside of KCC.

Section 4 – Equality Objectives
4.6 Respondents were asked if they understood the objective, if they believed it was relevant and were offered the opportunity to comment-on each objective which allowed us to have a qualitative response to the proposed objectives.

4.7 **Objective - Narrowing the achievement gaps for all protected groups**

Respondents were asked if they understood the Objective. 91% said yes. 86% also believed that this objective was relevant. Comments included:

“I believe sexuality should be added”

“I understand mental health/illness is under the disability band, and would love to see more representation of this group within the wider KCC”

“Should also look at class, sexuality and age for this objective.”

“what does this term ‘protected groups’ mean?”

4.8 **Objective - Increase post 16 – 25 participation and employment opportunities for the protected groups**

88% of respondents stated that they understood the objective. 86% stated that it was relevant. Comments included:

“16-25 years with different disabilities and BME groups is definitely under represented, would love to see more done to be more inclusive to this group.”

“Race & gender are already prominent with that age group, but Disability needs to become more important.”

4.9 **Objective – Ensure more young people from protected groups are able to access progression pathways post 16, including the offer of an apprenticeship.**

91% of respondents stated that they understood the objective and 90% agreed that it was relevant to equality outcomes. Comments included:

“Apprenticeships should be encouraged for anybody within this age bracket and only those with Disabilities will need to have special access, as their ability may be restricted physically.”

“Progression pathways is too vague - clearer language needed.”

4.10 **Objective - Increase access to early years for protected groups for the two-year old offer of free provision**
79% of respondents stated that they understood the question and 78% stated that the Objective is relevant. Comments on the objective included:

“Are all 2 year olds not protected group as this is based on needs and low income”

“I'm not sure I understand this objective as it is relevant to gender. If it is to increase access to free early years provision to single parents then I can see that it will likely benefit women as they are more likely to be single parents.”

4.11 Objective - Drive down exclusion from school to zero

91% of respondents understood the objective but only 81% believed that it was relevant to equality outcomes. Comments included:

“Difficult to achieve without the co-operation of parents who obviously influence behaviours”

“More characteristics should be included in this”.

“Very hard to imagine it’s achievable”

“I don't think this objective is achievable, without forcing schools to retain pupils who should not be there, but rather be schooled in an alternative setting. You're basically setting yourself up to fail.”

4.12 Objective - Where appropriate, fewer young people from protected groups become young offenders

88% of respondents understood Objective 6 and 90% agreed that it is relevant to equality outcomes. Comments included:

“More multi-agency work and creative implementation of education/training provisions is a key in tackling YP from these groups being engaged in youth offending”

“Not sure what is meant by 'where appropriate', but the overall objective seems otherwise sound.”

“ALL young people should be prevented from becoming offenders”

4.13 Objective - Protected groups' needs will be considered within all highways and transport schemes as well as the schemes potential to advance equality of opportunity

91% of respondents understood the objective and 81% thought it was relevant to equality outcomes. Comments include: “This is particularly relevant to people with sight and mobility related impairments, to older people and so on. (the need for on-board spoken announcements in buses in Kent; courtesy crossings/shared space
environments; proliferation of A-boards in town centres. This also ties in with the objective to increase participation, as poorly designed streets/highways create no-go areas for some protected groups.”

“Planning and design to result in a better-integrated public transport system in Kent. Easier to travel West-east by public transport; can be a nightmare to go North-South.”

“It's not clear why this objective is restricted to a small group of protected characteristics.”

“I think protected groups need to be more than considered, they need to be actively engaged with (e.g. disability groups). Also, gender is not a protected characteristic, sex is.”

“This should be enforceable across all transport options - at the moment a lot of the rail network does not achieve this”

4.14 Objective - The needs of all members of the community will be considered when investing in roads facilities and utilities that are delivered to meet the needs of Kent’s population changes

95% of respondents understood the objective. 81% thought it was relevant to equality outcomes. Comments included:

“Relevant for an ageing population of Kent and disabled people where there would need to be alternative/special facilities perhaps.”

“Information needs to be accessible i.e. BSL, Audio etc.”

“It's a bit broad - how is addressing the needs of all the community assisting with equalities?”

“All should mean all”

4.15 Objective – Irrespective of age disability race or belief Kent residents should be able to access our county’s high quality landscapes and environment

100% of respondents understood this objective. 93% thought it was relevant to equality outcomes. Comments include:

“Should this be there- what do you mean?”

“Consider how this can happen for people who rely on public transport when bus services into the countryside are considered for reduction or removal to save money.”
“In an ideal world this would be good but some public rights of way are not suitable for access without huge sums of money. We should consider and if possible do as much as we can when considering access for all.”

“Why race and religion?”

“I do not understand why sex is missing from this list. It is fairly well understood that one of the reasons women don’t go to isolated places by themselves, is because they feel more vulnerable than men do in public space (because of the fear of attack); a failure to recognise that, will ensure that Kent’s landscape and environment remains far less accessible to women than to men.”

4.16 Objective - The Libraries Registration and Archives service in Kent will continue to understand its local community needs and tailor its services accordingly

98% of respondents understood this objective. 91% felt it was relevant to equality outcomes. Comments include:

More LGBT authors and sections of books.

“Libraries, Registration and Archives have a good track record on this, and should be able to keep up a good momentum of progress, even though the placing of some libraries, such as Kent History and Libraries Centre away from the centre of town may have been a little detrimental to this.”

“Good to see community resources being looked at”

“This objective is not very specific like some of the others”

4.17 Objective - The health and wellbeing of Kent’s residents is improved

93% of respondents understood the objectives and 95% felt it was relevant to equality outcomes. Comments include:

“Wellbeing and health is an important part of each person’s life. Good to see it being addressed.”

“Should be relevant for everybody - I fall into none of those groups normally perceived to be disadvantaged or discriminated against but I would still like my own Health and Wellbeing to be considered.”

“Would we consider being more specific about what health and wellbeing aspects needs to be addressed. Otherwise a very large expectation and one difficult to monitor”
“However, this is applicable to everyone not just those who fall with in protected characteristics categories.”

“KCC has a public health responsibility and all Kent residents should have a right to access GP services.

“People with mental Health problems have long been an important client group and overall we have a strong record in supporting them… The combined effects of legislative changes, the recession and spending cuts are having significant impacts on people with mental health”

“Yes although statistics should reflect need: if the elderly population in Kent is statistically better off than on average then perhaps resources should be directed to help only elderly on benefits/low income. Resources can then be directed at groups where statistics support equality disparity -The Institute for Fiscal Studies recently published a report showing that the hourly earnings of women falls steadily after they become mothers so that, after 12 years, pay rates are 33 % less than men”

4.18 Objective - Safeguarding children and young people and vulnerable adults from harm

95% understood the objective. 93% felt it was relevant to equality outcomes.

Comments included:

“In today’s south east news there was a brief about the rise in child sexual grooming in children around Kent and Sussex. I know Schools and other agencies such as NSPCC/Childline and local voluntary organisations do a lot of work with schools and community groups. However, more joint initiatives across the board need to take place, which also takes into consideration child’s background and cultural background.”

“Transgender should be included”

“Not all departments work to the same principle about this. Young people over 18 are seen as adults and get conflicting advice”

“Although many of us cover this as mandatory training in our roles, people still need to feel confident in speaking out about this.”

4.19 Objective - Life chances and outcome of children and young people and vulnerable adults are improved through the delivery development and transformation of services

90% of respondents understood the objectives. 90% felt that it was relevant to equality outcomes. Comments included:

“Where does the text explain what we mean by ‘vulnerable adults’?”
“I think the service delivery model ought to be more child centred/person centred and embrace a more holistic approach to outcomes. Sometimes there seems to be isolated outcomes in different parts of an individual's life which doesn't take into account other areas and milestones of achievements. I suppose I am concerned about the long lasting impact an outcome has on a person's life, and more qualitative understanding of chances being met or fulfilled.”

“The right staff and staffing levels are required to achieve this”

4.20 **Objective - People can access the service that they need**

95% of respondents understood the question and 91% felt that it was relevant to equality outcomes. Comments include:

“Referral processes need to be simple and fair”

“More research with minority groups is needed”

“Yes - a clear objective, I wonder how it will be measured. E.g. accessing services for disabled children is very complicated and slow: by the time a child is diagnosed they will often be over 2 years of age after which the extended free hours is missed for their parents. How about extending it to families where one child is in receipt of DLA or a diagnosis- so the parents can have help attending all the appointments etc. for the elder child -e.g. attending courses often, childcare costs for sibling”

“Please provide materials in other languages if necessary”

“Too generic”

“10 & 11 are linked”

4.21 **Objective - The quality and range of services are improved though increasing engagement with service users and carers**

95% of respondents understood the question and 88% felt that it was relevant to equality outcomes.

“Training for carers in the private sector is crucial for the delivery of care in going into people's homes and residential settings.”

“There is also a need to engage with other bodies for advocacy and support, in particular those in the voluntary sector such as CAB”

“Core Principle”
4.22 Objective - Kent will recruit, retain and develop a workforce that reflects the communities we serve, and we will ensure the people who work for Kent feel valued and respected

95% of respondents understood the objectives and 88% felt it was relevant to equality outcomes. Comments included:

“Please ensure all recruitment tools such as application forms and online queries for jobs and agencies collect all monitoring information”

“Need to invest more and promote staff groups and the work they do to illustrate how this is being achieved.”

“This currently does not happen so how do you propose to do this? You actively recruit but then fall down on retaining and developing your staff with protected characteristics.”

“I am unclear how this will filter down to management in recruitment positions.”

“and are treated equally...? How will this objective be proven? What statistics and training will you put in place to support this objective? Value and Respect are hard to quantify - salary levels and % of BME/disabled/women in management are not. I think your objectives need to be more measurable and this is an easy one to implement”

“I think sometimes you need to do more than reflect the areas you serve, you need to over-represent in order to ensure that minority groups' voices do not get lost in the general noise.”

4.23 Objective - Publish Equality Analysis with all decisions

86% of respondents understood the objectives. 79% felt that it was relevant to equality outcomes. Comments included:

“Compliance should be sufficient but Publishing would be an extra expense and time waster.”

“published where? and when?”

“Wherever possible, publish in Word/PDF/Easy-read on the KCC website, the way you published the equality analysis of these objectives - great example of best practice.”

“I think the service delivery model ought to be more child centred/person centred and embrace a more holistic approach to outcomes. Sometimes there seems to be isolated outcomes in different parts of an individual's life which doesn't take into account other areas and milestones of achievements. I suppose I am concerned about the long lasting impact an outcome has on a person's life, and more qualitative understanding of chances being met or fulfilled.”
“The right staff and staffing levels are required to achieve this”

4.24 Objective - Ensure that when we use Information Communication Technology it is fully accessible for learning, working and getting into services

93% of respondents understood the question and 93% felt that it was relevant to equality outcomes. Comments included:

As long as it is remembered that not everyone has access or is computer literate

Yes - following the appropriate safeguarding and legal requirements

“Many elderly people are unable to use technology because they have not used when young and therefore there should be options that address this fact and they should not be forced to accept/use these facilities.”

“Share good practice with our partners so they do the same.”

4.25 Objective - Use Procurement and finance decisions to work towards outcomes and to demonstrate compliance with the Public Sector Equality Duty

70% of respondents understood the question and 67% felt that it was relevant to equality outcomes. Comments included:

“Training for carers in the private sector is crucial for the delivery of care in going into people’s homes and residential settings.”

“There is also a need to engage with other bodies for advocacy and support, in particular those in the voluntary sector such as CAB”

5. Equality Analysis

5.1 General feedback on the EqIA was positive. The majority of respondents felt the EqIA had duly considered the impact of the policy and the objectives on the protected characteristics. Comments included:

“The Assessment is easy to read and makes the policy simple to understand”

However a number of comments were made in relation to the use of “Gender” instead of “Sex”. Comments included:

“The characteristic is sex not gender”
6. How feedback has shaped the final version

6.1 Changes to the policy will include clarity on Sex as a specific characteristic and KCC will consider how it addresses its public sector Equality Duty in relation to the “Gender Identity” or “Transgender” Protected Characteristic.

6.2 One of the most significant changes following consultation is the inclusion of an objective concerning the mental health and wellbeing of BME communities and women who suffer domestic violence. KCC staff, statutory and VCS partners and residents were concerned about the experience and number of women and BME people in KCCs Mental Health service.

6.2 Although not included as a specific objective the mental health of BME communities and women who suffer domestic violence was of concern particularly in external focus groups with BME communities.

“Mental Health – “people fall through the net”

“People are left in limbo” – “when they seem uncooperative”

“A lot of problems with people ending up with no help at all”

“When people have suffered – some questions are too painful” – be careful”

“Culture and circumstances that people have been through ..... Questions are right but you have to understand the circumstances”

6.3 To this end, the following objective will be included:

- The number of BME people and women in the mental health system is reduced.

6.4 The following changes have been made:

<table>
<thead>
<tr>
<th>You said</th>
<th>We did</th>
</tr>
</thead>
<tbody>
<tr>
<td>The reporting mechanism for the objectives must be clear.</td>
<td>We have clarified how the objectives will be reported under the section ‘Our Performance’.</td>
</tr>
<tr>
<td>We should use simple language.</td>
<td>We have made the language and purpose of the policy as clear and simple as possible.</td>
</tr>
<tr>
<td></td>
<td>We have developed an easy read version of the policy and it has been proposed that the widely published version of the policy and objectives should be in “easy read” supported</td>
</tr>
<tr>
<td>Statement</td>
<td>Considerations/Actions</td>
</tr>
<tr>
<td>-----------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Objectives must be specific about which protected characteristic is being addressed.</td>
<td>Where possible we have stated which characteristics each objective seeks to address.</td>
</tr>
<tr>
<td>We must make sure that equality objectives are not lost when services are procured or commissioned.</td>
<td>We have included contractors, procured and commissioned services in the section on accountability and have clarified our expectations in relation to the Equality Duty. We will share our equality objectives through our commissioning and procurement cycles and identify where those objectives will need to be delivered by those who are delivering services on our behalf.</td>
</tr>
<tr>
<td>We must focus on areas of non-compliance.</td>
<td>We have made the policy clearer and have an entire section on accountability.</td>
</tr>
<tr>
<td>We should have a more positive position on Equality.</td>
<td>We have considered the language that we use and have worked to ensure that the objectives are positive serving to build on some of the excellent practice that is already in place.</td>
</tr>
<tr>
<td>Equality Objectives should make a real difference.</td>
<td>We have developed equality objectives that are based on our understanding of the equality priorities in services.</td>
</tr>
<tr>
<td>We must acknowledge the role that people outside KCC have in fostering good relations such as the voluntary sector and the wider community.</td>
<td>We have acknowledged the role the voluntary sector and the wider community plays in fostering good relations.</td>
</tr>
<tr>
<td>Mental health is an equality issue that concerns many people.</td>
<td>We have included an equality objective that addresses the mental health needs of specific groups.</td>
</tr>
</tbody>
</table>
8 Final Decision

8.1 The draft Equality and Human Rights Policy was discussed at the Policy and Resources Cabinet Committee on 2 December 2016. The Cabinet Member for Corporate and Democratic Services made the Key Decision to adopt the Equality and Human Rights Policy and Objectives 2016 - 2020. The final policy is available on www.kent.gov.uk/diversity.