



Initial Equality Impact Assessment

Completed by: Breige Convery

Date: 11 March 2009

<p>Name of policy or function to be assessed:</p> <p>Mid Suffolk District Council Race Equality Scheme 2009 - 2012</p>	<p>Name of manager responsible for assessment: Jonathan Free</p> <p>Team undertaking this assessment Policy Team</p> <p>Name of Officer providing guidance on this assessment Aimi Serjeant</p> <p>Any other relevant individuals or groups involved in this assessment Breige Convery, Policy Officer Anna Girling, Policy Officer</p>
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EQUALITY IMPACT ASSESSMENT FORM

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<p>Is this a new or existing policy/function/service?</p>	<p>It is a revised policy. The Race Equality Scheme was previously incorporated into a Comprehensive Equality Scheme. After consultation on the draft revised Comprehensive Equality Scheme 2008-11 a decision was made to separate the Race Equality Scheme as a stand-alone scheme.</p>
<p>Step 1. Describe the aims, objectives and purpose of the policy or function/service (include how it fits in to wider aims or strategic objectives).</p>	<p>Aims - To meet the general duty to:</p> <ul style="list-style-type: none"> • Eliminate racial discrimination • Promote equality of opportunity • Promote good race relations <p>Objectives – The Race Equality Scheme will show as required by the race equality duty, how Mid Suffolk District Council will, regarding service provision:</p> <ul style="list-style-type: none"> • State those of its functions, policies or proposed policies that are relevant to the general duty • Assess and consult on likely impact of its proposed policies for any adverse impact on the promotion of race equality • Monitor policies for any adverse impact on the promotion of race equality • Publish the results of such assessments, consultations and monitoring



	<ul style="list-style-type: none">• Ensure public access to information and services• Train staff in connection with these duties• Review three yearly this scheme <p>As laid down in the Race Equality duty regarding employment:</p> <ul style="list-style-type: none">• Monitor by racial group the numbers of<ol style="list-style-type: none">1. staff in post2. applicants for employment, training and promotion3. staff receiving training4. staff benefiting from or suffering detriment as a result of its performance assessment procedures (PDR at Mid Suffolk District Council)5. staff involved in grievance procedures6. staff subject of disciplinary procedures7. staff ceasing employment with Mid Suffolk District Council• Publish annually the results of this monitoring <p>Purpose – The purpose of producing the Race Equality Scheme is:</p> <ul style="list-style-type: none">• To comply with statutory duties regarding race equality*• To ensure Mid Suffolk District Council provides equal access and equal quality services for people from all racial and ethnic backgrounds• To ensure equal access to employment opportunities and opportunities as an employee for people of all racial and ethnic backgrounds
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	<p>Links to strategic objectives – The scheme links implicitly to all strategic objectives: Affordable and decent housing Responsible environmental management Safer and cohesive communities Jobs and the rural environment Responsive planning Community engagement</p> <p>It is especially linked to Safer and cohesive communities with respect to the objective 'Improve access to services to minority, disadvantaged and vulnerable groups' and to Community Engagement with respect to the objective to 'Establish area forums and involve local people'.</p> <p>It is also relevant to our Gold Standard Customer Service and our ambition to provide local access to local services, as outlined in the Mid Suffolk District Council Strategic Plan 2007 – 2011.</p> <p>*as set out in the <i>Statutory Code of Practice on the Duty to Promote Race Equality</i>, Commission for Race Equality, 2002</p>
<p>Are there any associated objectives of the policy or function (i.e. setting a standard of good practice, improving</p>	<p>Associated objectives - Other objectives are to:</p> <ul style="list-style-type: none"> • Set a standard of good practice in terms of race equality;



<p>consumer confidence in the service)?</p>	<ul style="list-style-type: none"> • Ensure fair and equal access to quality Council services and customer promote confidence in the Council's services among people of all racial groups; • Increase employee confidence in the inclusiveness of Mid Suffolk District Council as an employer; • Increase openness and public involvement in service and policy development; • Improve the overall development process and standard of Mid Suffolk District Council's policies in terms of equality; • Create a more diverse, public focussed, rather than Council focussed, approach to policy and service development; • Ensure that our services don't overlook or exclude any racial group
<p>Who is intended to benefit from the policy/function and in what way?</p>	<p>People from black and minority ethnic (BME) groups living or working in Mid Suffolk who may be disadvantaged or discriminated against directly or indirectly, are intended to benefit by the policy. They will benefit from the outcomes of actions taken to:</p> <ul style="list-style-type: none"> • race equality impact assess policies and services; • gather and analyse race equality data; • identify and consult with BME groups about service and policy development; • draw up and implement action plans to address adverse impact where identified; • monitor progress against action plans. <p>...so that these services and policies and services will be inclusive and to ensure that the needs of BME groups are met.</p>



	<p>Everyone will benefit from the scheme as it promotes good race relations and will improve community cohesion. The Race Equality Scheme will communicate that Mid Suffolk District Council is serious about treating people of all racial groups fairly in respect of service provision and employment. People will feel more confident of the Council for its mutual benefit.</p> <p>The policy will improve the perception among Council staff that employees of all racial backgrounds will be treated fairly, discrimination and harassment dealt with, and good relations promoted, reinforcing the perception of the Council as a fair and equal employer.</p>
<p>What are the intended outcomes of this policy/function?</p>	<p>The intended outcomes are that the Council will have: with regard to service provision:</p> <ul style="list-style-type: none"> • Identified functions, policies, services or proposed policies, services that are relevant to the general race equality duty; • Assessed and consulted on likely impact of its proposed policies, functions, services for any adverse impact on the promotion of race equality; • Monitored policies/services/functions for any adverse impact on the promotion of race equality; • Published the results of such assessments, consultations and monitoring; • Ensured public access to information and services; • Trained staff in connection with these duties; • Reviewed this scheme at the end of three years. <p>With regard to employment the Council will have :</p>



	<ul style="list-style-type: none"> • Monitored by racial group the numbers of <ol style="list-style-type: none"> 1. staff in post 2. applicants for employment, training and promotion 3. staff receiving training 4. staff benefiting from or suffering detriment as a result of its performance assessment procedures 5. staff involved in grievance procedures 6. staff subject of disciplinary procedures 7. staff ceasing employment with Mid Suffolk District Council • Taken action deemed necessary as a result of monitoring • Published the results of this monitoring each year
<p>Step 2 What baseline quantitative data do you have about the policy/function relating to equalities groups (e.g. monitoring data on proportions of service users compared to proportions in the population)?</p>	<p>We have data on racial background of staff. In December 2009 employment statistics for Mid Suffolk District Council were analysed. The response rate was 84%.</p> <p>Concerns have been raised that the small number of employees from Black and Minority Ethnic groups creates a potential conflict between the duty to publish the ethnic monitoring data and the Council's responsibilities to staff under data protection legislation. For this reason the data is not published here. Anyone interested in accessing the information may wish to consider making a request under the Freedom of Information or Data Protection Acts and a formal response will be made.</p>



Given the information we do have, we can say that against a district 'visible' BME population of 1% in 2001 Census or 2.6% by ONS in 2006, the Council, based on information disclosed, in neither case is representative of the local population in terms of racial makeup. However, the non-response rate is significant.

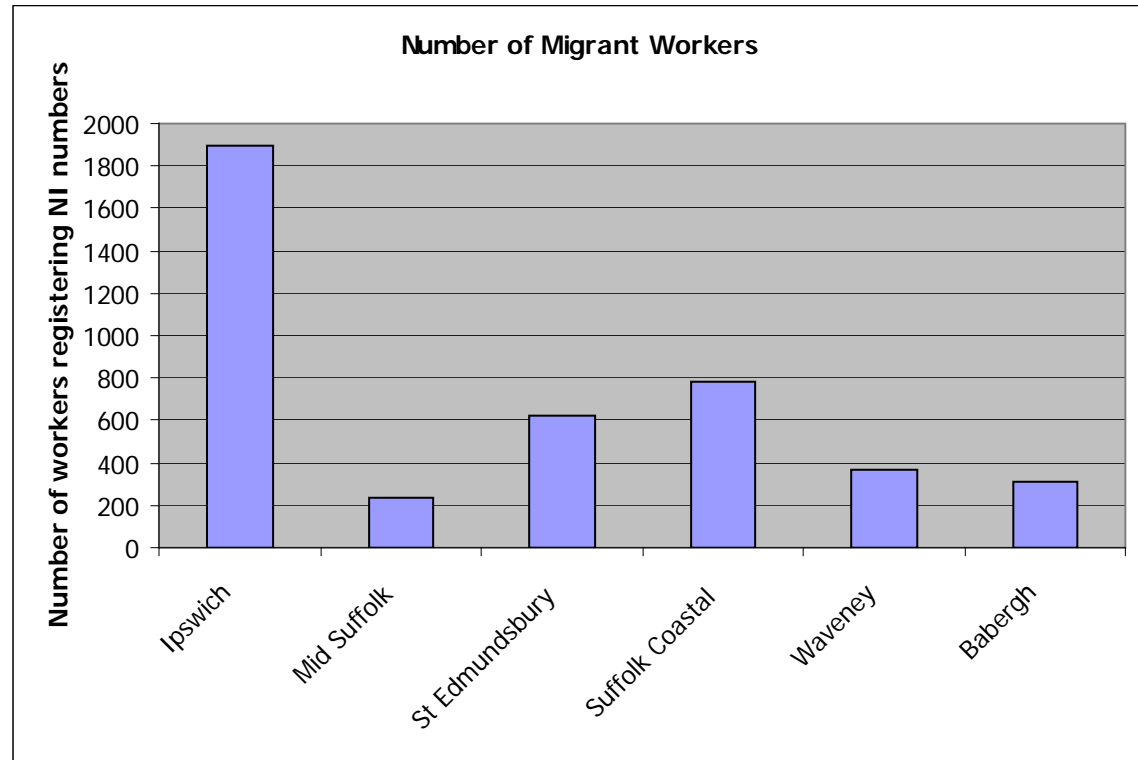
According to the 2001 Census, 99% of the population classed themselves as white (British/Irish/Scottish/or Other); 1% classified themselves as a member of a visible minority. The response rate was approximately 83%.

National Insurance Number Registrations

The department of work and pensions conducts a surveys of the number of new national insurance number registrations from foreign nationals in each local authority area. They provide a rough guide, with qualifications because of the nature of the data, regarding inward migration to Suffolk. From 2004-7, 13 520 people registered to work in Suffolk, 640 (4.7%) in Mid Suffolk.

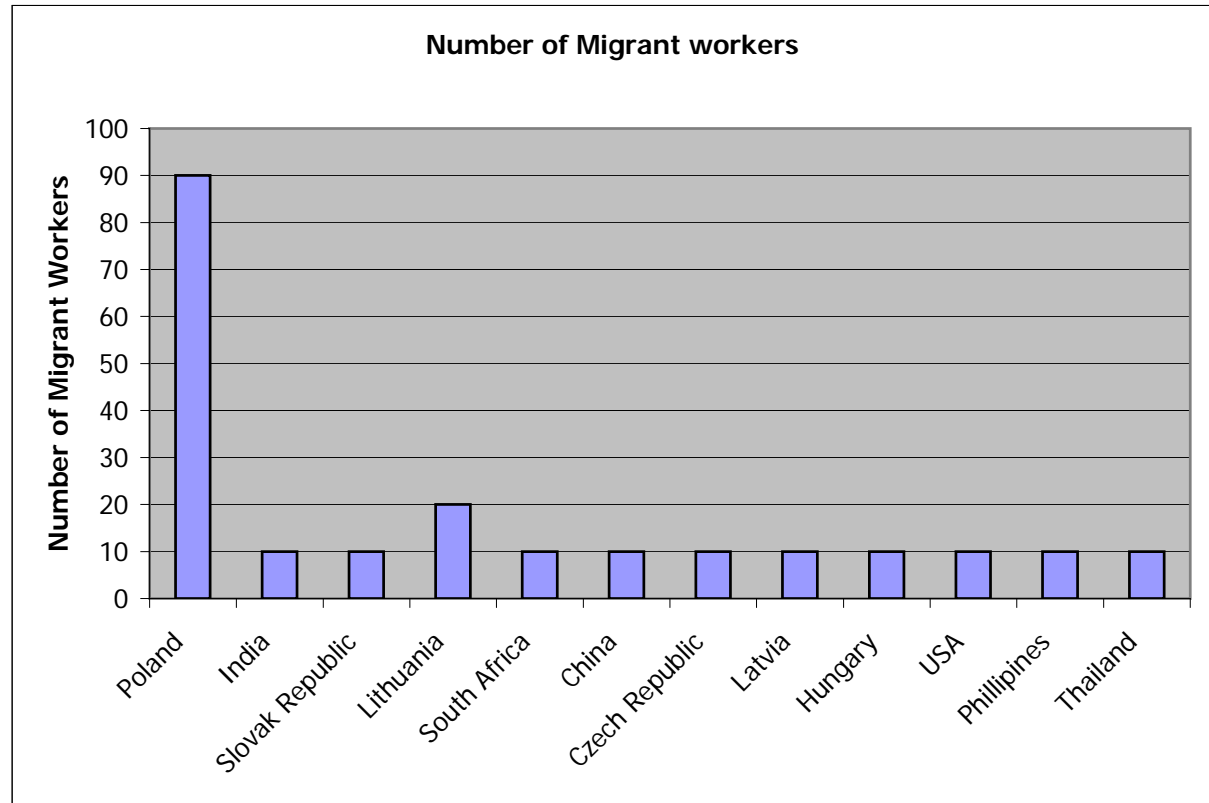


The graph below shows the breakdown of the Suffolk authority registrations for 2006/7 by district/borough.





The graph below shows nationalities of people registering in Mid Suffolk in 2006/7.



We have information about migrant workers working in some of our local factories:



Company	Number of workers
Stark Naked Foods, Eye	Less than 20 Polish
Daregal Gourmet Ltd, Eye	None
Frozen Herbs Ltd, Eye	20 Polish
Rosemary and Thyme, Eye	Less than 20 permanent up to 10 in addition Polish
Steng Ingredients, Eye	Les than 20 Migrants Polish Albanian Slovakian
Camstar, Eye	Less than 20 Polish
Grampian Country Foods Ltd, Eye	150 people Polish, Latvian, Lithuanian, Portuguese, Iraqi, Afghan 27 different nationalities in all
2 Sisters Food Group, Haughley Park, Stowmarket	200 people 60% of workforce is migrant workers Lithuanian (15%), Polish (13%), Iraqi Kurds (12%), Portuguese (7%), various East Europeans (A8) countries
Ichiban UK Church Farm, Earl Stonham, Stowmarket	Of a workforce of 300, 80%, 240 are estimated as migrant workers Polish Serbian



The community in Stowmarket includes people who were born in Kerval, India and from Poland. Precise information we do not have.

There are a number of Gypsies and Travellers living on sites in Mid Suffolk. The Caravan Count is known to be an unreliable methodology but offers the best data we have for Gypsies and Travellers.

The table below shows the DCLG Caravan Count for the Suffolk study area by local authority between July 2004 and July 2006.

Count	Authorised socially rented sites	Authorised private sites	Unauthorised Developments	Unauthorised Encampments	Caravans
<i>Jul 2006</i>	0	78	38	10	126
Jan 2006	0	72	38	3	113
Jul 2005	0	72	32	0	104
Jan 2005	0	72	24	0	96
Jul 2004	0	50	0	0	50

There are estimated to be approximately 200 Gypsies and Travellers living in Gypsy and Traveller sites Mid Suffolk although there are significant, but unknown numbers, of Gypsies and Travellers living in 'bricks and mortar' accommodation.



<p>What qualitative data do you have on different groups (e.g. results of previous consumer satisfaction surveys/consultation, feedback exercises, or evidence from other authorities undertaking similar work)?</p>	<p>Qualitative data – we have no qualitative data of our own.</p> <p>We are seeking information from partners.</p>
<p>Step 3 Are there concerns that the policy / function could have a differential impact on different racial groups?</p> <p>What evidence do you have for this? Do the differences amount to an adverse impact or unlawful discrimination?</p> <p>If there are concerns that it is indirectly discriminatory could it still be justifiable e.g. on grounds of promoting equality of opportunity for one group? (It is advisable</p>	<p>Yes, it will not have a differential negative impact on minority racial/ethnic groups. It may have a positive impact on some racial groups in as far as they may have service provision or employee experience that is improved to a level equal to that experienced by other racial groups as a norm. It is intended to focus on race and identify and redress racial discrimination and harassment where it is found and to promote good relation between people of different race. It does not have a differential negative impact on any racial group.</p> <p>None. This is not an adverse impact or unlawful discrimination.</p>



<p>to get legal advice on this.)</p>	
<p>Are there concerns that the policy / function could have a differential impact on gender?</p> <p>What evidence do you have for this? Do the differences amount to an adverse impact or unlawful discrimination?</p> <p>If there are concerns that it is indirectly discriminatory could it still be justifiable e.g. on grounds of promoting equality of opportunity for one group? (It is advisable to get legal advice on this.)</p>	<p>No. It will not have a negative differential impact on people of different gender.</p> <p>None.</p>
<p>Are there concerns that the policy/function could have a differential impact on Disabled People (including children with additional needs)</p> <p>What evidence do you have for this?</p> <p>Do the differences amount to an adverse</p>	<p>No. It will not have a negative differential impact on people who have a disability.</p> <p>None.</p>



<p>impact or unlawful discrimination?</p> <p>If there are concerns that it is indirectly discriminatory could it still be justifiable e.g. on grounds of promoting equality of opportunity for one group? (It is advisable to get legal advice on this.)</p>	
<p>Are there concerns that the policy / function could have a differential impact on Lesbians, Gay Men, Bi-sexual and Transgender people than on heterosexual young people or adults?</p> <p>What evidence do you have for this?</p> <p>Do the differences amount to an adverse impact or unlawful discrimination?</p> <p>If there are concerns that it is indirectly discriminatory could it still be justifiable e.g. on grounds of promoting equality of opportunity for one group? (It is advisable to get legal advice on this.)</p>	<p>No. It will not have a negative differential impact on people of different sexual orientation.</p> <p>None.</p>



<p>Are there concerns that the policy/ function could have a differential impact on younger or older people?</p> <p>What evidence do you have for this?</p> <p>Do the differences amount to an adverse impact or unlawful discrimination?</p> <p>If there are concerns that it is indirectly discriminatory could it still be justifiable e.g. on grounds of promoting equality of opportunity for one group? (It is advisable to get legal advice on this.)</p>	<p>No. It will not have a negative differential impact on people of different ages.</p> <p>None.</p>
<p>Are there concerns that the policy / function could have a differential impact on faith groups /individuals?</p> <p>What evidence do you have for this?</p> <p>Do the differences amount to an adverse impact or unlawful discrimination?</p>	<p>No, it will not affect people of different faith/religious groups differently.</p> <p>None.</p>



<p>If there are concerns that it is indirectly discriminatory could it still be justifiable e.g. on grounds of promoting equality of opportunity for one group? (It is advisable to get legal advice on this.)</p>	
<p>Step 4</p> <p>Should the policy / function move to a Full Impact Assessment (Report template) and if so why have you decided this?</p> <p>Date by which the Full Impact Assessment will take place:</p>	<p>No. The policy will not adversely impact people of any equality strand other than people of different race or ethnicity. The impact will be positive and therefore there is no need for further assessment.</p> <p>No.</p>
<p>Signed (completing officer):</p> <p>Breige Convery</p> <p>Job Title: Policy Officer</p>	<p>Date of completion of Initial Impact Assessment:</p> <p>By Policy Officer: 11 March 2009</p> <p>Revised after consultation with colleagues: 2 April 2009</p>

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