

**PETERBOROUGH CITY COUNCIL
SINGLE EQUALITY SCHEME 2011 to 2014**

CONSULTATION DRAFT - MARCH 2011

Contents	Page
1. Foreword from the leader of the council and the chief executive	3
2. Introduction to and purpose of this scheme	4
3. Peterborough City Council's equality commitments and values	4
4. Profile of Peterborough city	5
5. The council	6
6. Legal context – our statutory duties	6
7. Equality in service provision	10
8. Equality Impact Assessment	11
9. Equality in employment	12
10. Equality in procurement	12
11. Working with partners, involvement and consultation	12
12. Implementing, monitoring, reviewing and reporting progress	12
13. Responding to incidences of discrimination and harassment	13
APPENDICES	
Appendix 1 The meaning of disability	
Appendix 2 Equality Impact Assessment process	
Appendix 3 Related employment policies and procedures	
Appendix 4 Equality Action Plan	

1 FOREWORD BY THE LEADER OF THE COUNCIL AND THE CHIEF EXECUTIVE

- 1.1 This is our first Single Equality Scheme (SES) and we have brought all our policies and plans together within one document to ensure that all aspects of diversity are addressed.
- 1.2 “Creating Opportunities and Tackling Inequality” is one of Peterborough City Council’s corporate objectives, embedded in its Sustainable Community Strategy. We firmly believe that every person should have equal access to services and to opportunities, and this scheme, together with its action plan, will help us to achieve that.
- 1.3 We will revise the scheme itself every three years but the action plan will be revised and updated annually to maximise our opportunities to make a real difference to the lives of people living and working in Peterborough.
- 1.4 In developing this scheme we used feedback from consultation with partners, stakeholders and our local communities. We will continue to work closely with them to ensure that we both build upon the work and achievements to date and meet our statutory requirements.
- 1.5 We will personally promote this scheme and work with our officers and elected members to ensure that equality is an essential consideration in everything that we do.

Councillor Marco Cereste
Leader

Gillian Beasley
Chief Executive

2 INTRODUCTION AND PURPOSE OF THE SINGLE EQUALITY SCHEME

- 2.1 The council has legal responsibilities to ensure that equality and diversity is integrated into its service planning and delivery. This Single Equality Scheme underpins the council's strategic plans and demonstrates how it will meet those legal responsibilities; but it goes further than that and demonstrates how the council will deliver on its vision that every person should have equal access to services and to opportunities.
- 2.2 The scheme brings together the equality schemes the council previously had in place into one document. It sets out how we will meet our obligations under current equalities legislation and guidance.
- 2.3 "Creating opportunities and tackling inequalities" is one of Peterborough City Council's corporate objectives, embedded in its Sustainable Community Strategy and linked with the current development of the Greater Peterborough Partnership Single Delivery Plan. This scheme, together with the action plan, is a guide to our work in opposing discrimination and recognising the benefits of a diverse community. The Sustainable Community Strategy sets out how we see Peterborough growing and how we intend to make sure that everyone can benefit from the opportunities provided by this growth. The scheme outlines:
- The council's vision and commitments to promoting equality and diversity and challenging discrimination in service delivery and employment functions;
 - Guidance to staff and councillors about the promotion of equal opportunities and opposing discrimination, both as an employer and a service provider; and how we will tell the community and partners about our approach to equalities;
 - Key actions for 2011 to 2014;
 - Our equality impact assessment procedures;
 - Our statutory duties;
 - Related employment policies and procedures; and
 - The profile of Peterborough's population and workforce.
- 2.4 Who does it apply to?
- 2.4.1 This scheme applies to:
- Users of the council's services and visitors to its sites
 - Councillors
 - Employees
 - Any person on secondment from other organisations who work within the council
 - Volunteers
 - Freelance and temporary staff representing the council and
 - Contractors and sub-contractors

3 OUR EQUALITY COMMITMENTS AND VALUES

- 3.1 We recognise that people may experience different forms of disadvantage depending on their age, ethnicity, race, gender, gender reassignment, religion and belief, sexual orientation, marital or civil partnership status and whether or not they have a disability. We want to ensure that everybody can share in the opportunities within Peterborough and our Single Equality Scheme also covers other reasons why people may face disadvantage e.g. through economic disadvantage or through caring responsibilities. We value and will continue to promote the rich cultural diversity that Peterborough enjoys and will work positively with all sectors of our community.
- 3.2 One of the council's key strategic priorities is "tackling inequality and creating opportunities". This requires us to try to ensure that everything we do is accessible to everyone and identify, and where possible remove, the barriers which stop people accessing our services. Equality of opportunity requires us to recognise that not everyone starts from the same position and that to create a fairer society we must recognise different needs. We also need to know who uses our services and design our services so that they meet the needs of users.
- 3.3 Creating equality of opportunity not only enables individuals to reach their potential, it creates a more cohesive society and may help to create a more prosperous economy.
- 3.4 As an employer we will promote equality in the workplace to keep it free of harassment, bullying and all forms of discrimination. We will achieve this through effective and appropriate employment policies and procedures.

4 PROFILE OF PETERBOROUGH CITY

- 4.1 Peterborough is a rapidly expanding city in the East of England to the north of Cambridgeshire that has seen significant growth in the last 40 years, growth that continues and expands as the M11 corridor develops.
- 4.2 A Brief Demographic Overview
- Peterborough has an official resident population of around 164,000 people (mid 2008 population estimates based on 2001 census).
 - Population growth forecasting indicates that Peterborough will have a population of approximately 175,000 people by 2011, 189,000 by 2016 and 204,000 by 2021.
 - Local information suggests that the true population is higher, at least 175,000 (there are more than 180,000 patients registered with a GP in Peterborough).
 - Peterborough is more ethnically diverse than most areas in the East of England, with 1 in 14 people coming from Asian ethnic groups. The largest Asian ethnic group is the Pakistani population, with around 7,100 people living in Peterborough.

- The Office for National Statistics (ONS) categorises Peterborough as a "new and growing town" along with several other local authority areas.
 - Peterborough City Council has a higher population density than found on average in the East of England and in England, at 4.8 people per hectare.
 - Peterborough has relatively high levels of deprivation compared with many areas and is ranked amongst the third of English local authorities with the greatest levels of deprivation.
 - Levels of income deprivation are higher than the England average. One child in four lives in a household dependent on means tested benefits.
 - The rate of reported crime is higher than the England average.
- 4.3 Our Joint Strategic Needs Assessment (available on the city council's website www.peterborough.gov.uk) sets out a lot of detail about the health and wellbeing of our population.
- 4.4 Population Growth
- 4.4.1 Peterborough is a growing city with an expected population growth of over 25% by 2021. The make up of the population is changing with new ethnic groups coming to the city and initially settling in the most deprived areas. This presents new and continuously shifting challenges when designing local services sensitive to the needs of the population.
- 4.4.2 Population estimates show that Peterborough's registered population has grown from 157,400 in 2001 to 170,700 in mid-2007 (Cambridgeshire County Council Research Group) and the latest registered population figure is 178,134 for January 2009. Around one third of the increase is estimated to be due to natural change (more births than deaths) and a further half is due to international migration, more recently from eastern European countries. The increase in population is evident despite significant numbers of people moving from Peterborough to the rest of the UK.

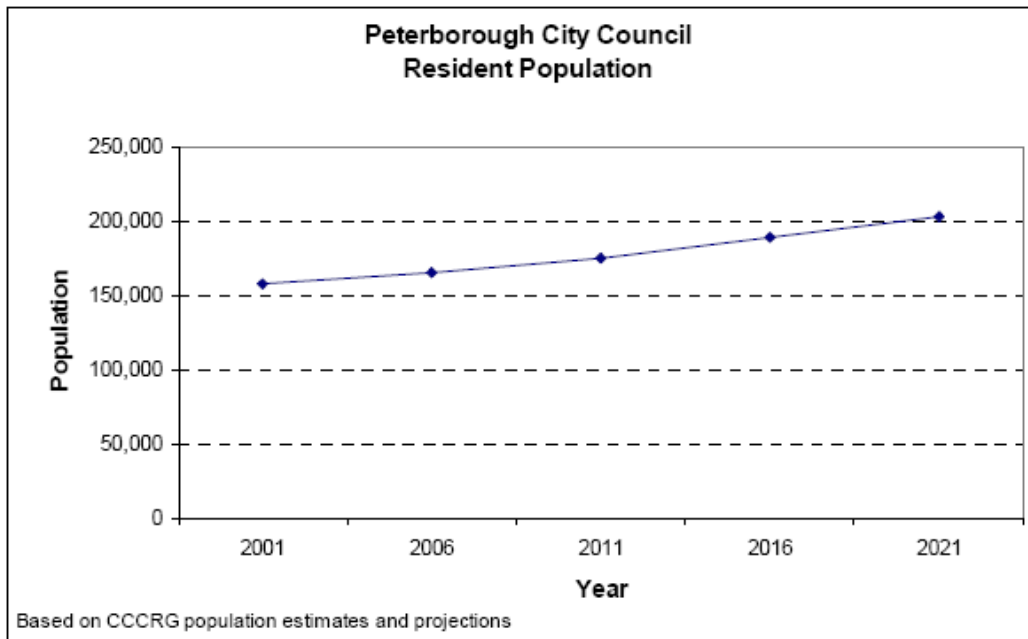


Figure 1: Peterborough City Council Resident Population

Population growth is forecast to be greatest among those aged over 65; this is consistent with national population ageing trends.

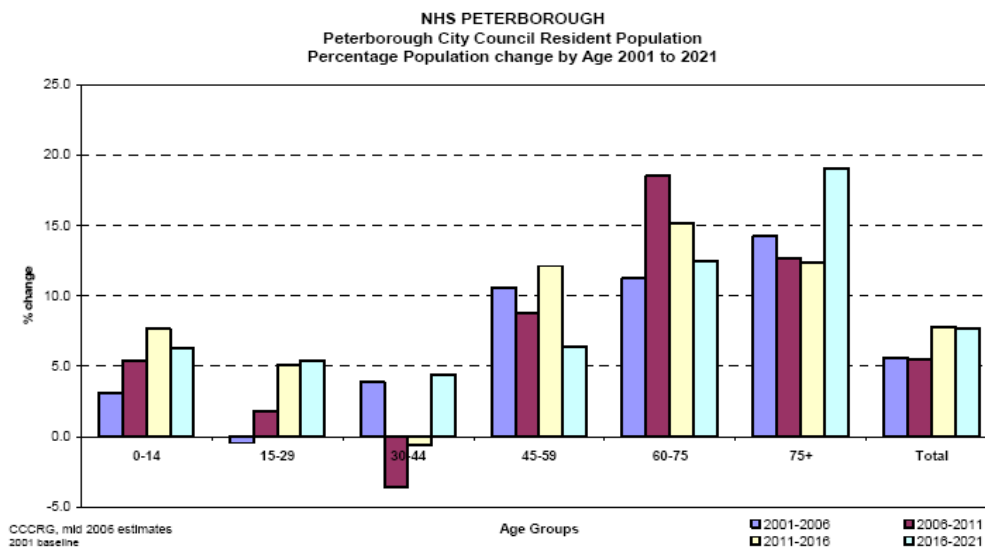


Figure 2: Peterborough City Council Resident Population Percentage Population change by Age

4.5 Ethnicity

4.5.1 The majority of Peterborough's population is white British, although it has experienced an increase in the proportion of residents who come from black and minority ethnic communities. A higher proportion of Peterborough's population is from black and minority ethnic communities compared to similar areas in England and the East of England average.

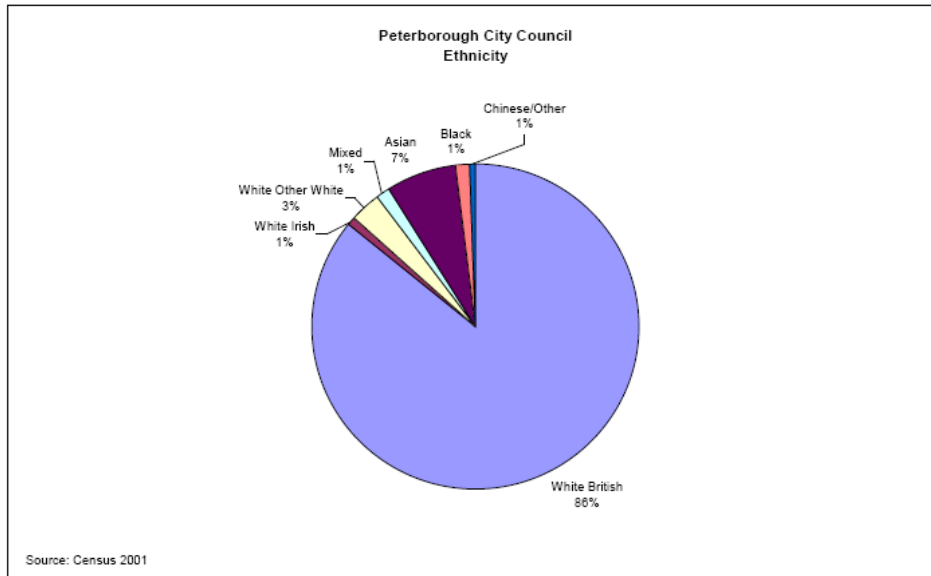


Figure 3: Ethnicity of Peterborough City Council Residents

4.5.2 The level of international migration into Peterborough has increased in recent years, particularly since 2004, when the accession states from Eastern Europe joined the European Union. Analysis of existing data sources, including the Worker Registration Scheme, National Insurance Number registrations and GP registrations, shows that people from Eastern Europe now form the largest group migrating into Peterborough, particularly those from Poland, Lithuania, Slovakia and the Czech Republic.

4.5.3 Peterborough has a large and growing migrant population, particularly from Eastern Europe. Data from the 2001 Census is the latest officially available, but the situation has changed considerably since then and will not be officially updated until after the 2011 Census. Ipsos Mori for UK Borders Agency in January 2010 estimated the migrant population is around 25,000 (although unofficially commented that it could be as high as 35,000). National Insurance registration data suggests a migrant population of just over 25,000. Of these 76% are from A8 + A2 countries (the biggest single group being Polish at 45%), 4% other EU and 19% non-EU.

4.5.4 A 'most likely' scenario, based on a consideration of what is known about patterns of migration in different continents, would suggest that in 2008 approximately 6,000

additional migrants now form part of Peterborough's resident population compared to 2001.

4.5.5 Peterborough has a diverse and multi-cultural society with some population groups facing social exclusion and marginalisation. These groups include:

- People living in more deprived areas.
- Homeless and other groups facing social exclusion.
- People with less robust social networks.
- Black and minority ethnic (BME) groups including new arrivals and Gypsies and Travellers.
- People who are unemployed and/or in receipt of long-term incapacity benefit.
- People in contact with the criminal justice system.
- Children affected by any of the above.

4.5.6 There has been a significant rise in the number of black and minority ethnic pupils attending Peterborough schools from an average of 23.1% in 2003 to 29.7% in 2007. There are at least 24 different languages which are the first language for students within our schools.

4.6 Gypsies & Travellers

4.6.1 These are a recognised ethnic group for the purpose of the Race Relations Act (1976) but there is no accurate data for Gypsies and Travellers as this information was not requested in the last census. Best estimates suggest that Peterborough has around 2,000 Gypsies and Travellers.

4.6.2 Following the abolition of the Regional Spatial Strategy the council will be reviewing the need for Gypsy and Traveller sites in Peterborough based on genuine local, rather than regional, evidence and demand.

4.7 Faith groups

4.7.1 Peterborough has a large number of different faith groups, with most major faith groups represented. The Peterborough Inter-faith Council has over 30 years of history and a newly formed Faith and Cohesion Network is working to encourage different faith groups and denominations to work together closely on cohesion matters. A Cohesion Manager works across partners based within the Greater Peterborough Partnership.

4.8 Deprivation

4.8.1 There are a number of deprived wards across Peterborough and national indices of deprivation ranks Peterborough as the 90th most deprived (out of 354) local authority areas, with 26% of the population of Peterborough living in the 10% most deprived Super Output Areas in England.

4.8.2 Super Output Areas are national, artificial geographical units used to measure deprivation at two levels. Lower Super Output Areas of approximately 1,500 people, and Middle Super Output Areas of approximately 7,500 people. Super Output Areas do not relate to electoral wards, but are used to monitor deprivation and inequalities.

- 4.8.3 Some parts of the Dogsthorpe ward are within the 3% most deprived Super Output Areas in England. A further seven areas in Peterborough are deemed to have high levels of deprivation. These areas are characteristically linked to health inequalities, barriers to higher education and employment opportunities and higher incidences of crime and disorder.
- 4.8.4 In contrast, six areas are within the 10% least deprived Super Output Areas in England.
- 4.9 People with a Disability
- 4.9.1 Learning disability is the most common form of disability in Britain, affecting around 1.2 million people. It is estimated that there are 339 people in the Peterborough resident population aged 15 to 64 with profound learning disability, and a further 3,803 with mild to moderate learning disability. Some people live relatively independently, hold down jobs and have busy social lives. At the other extreme, where people have profound and multiple disabilities, round-the-clock support can be necessary. "Valuing People Now" sets out the framework to ensure that everyone with a learning disability is supported to achieve good outcomes and live the life they want.
- 4.9.2 There are an estimated 17,774 people aged 16 to 64 with mental health problems in Peterborough, based on the Mental Health National Service Framework prevalence estimates.
- 4.9.3 NHS Peterborough maintains a register of people with sensory impairments and 388 people with sensory impairments were supported by community based social care services in 2008, covering 26.1% of those registered.
- 4.9.4 Approximately 10% of the population of Peterborough provide unpaid care to family members, friends and neighbours - their role and contribution to society and the people they care for needs to be recognised and valued. Without unpaid carers, formal services would be unable to cope with demand.
- 4.9.5 Children make up approximately 25% of the total population of Peterborough, and as at 2010 it is estimated that there are 1,245 (0.77% of total population) children with disabilities, 1,283 (0.79%) children with special educational needs, and 287 (0.17%) with a social care need. It is difficult to identify the total cohort of children with a disability (this is a national problem, not specific to Peterborough) but this is the best estimate of children with a disability.
- 4.9.6 It is universally recognised that there are increasing numbers of children and young people with disabilities, and a growing number of individuals being diagnosed with a rising number and range of disabilities, impairments and conditions. Many of these individuals have eligible needs for services across health, social care and education. An estimated 35,000 people have a long-term disability in Peterborough.

4.10 Working with local neighbourhoods

The city council has been working hard to develop neighbourhood working and close links with voluntary and community groups to ensure we understand and know our communities better. This enhanced understanding will enable us to ensure our services incorporate the needs of the most vulnerable and excluded individuals and groups. Neighbourhood Committees provide over-arching infrastructure for this work and the council will continue to develop services around neighbourhoods whenever possible. A social inclusion manager post has been included in the council's neighbourhood structures to ensure that all communities are included financially, socially and politically.

5 ABOUT THE COUNCIL

5.1 Peterborough is a unitary authority bordered by Cambridgeshire, Northamptonshire and Lincolnshire. Its role is to protect and enhance the community's social, economic and environmental well being. As a unitary authority, Peterborough City Council is responsible for delivery of all local authority services within its boundaries. The council follows the Strong Leader and Cabinet model of executive arrangement. This means that full council is responsible for approving the constitution, and the policy and budget framework, and the Leader and Cabinet are responsible for implementation of the council's budget and policy framework by managing all services. Promoting equality of opportunity is an important issue which will be taken into consideration throughout all the council's decision making activities.

6 LEGAL CONTEXT – STATUTORY DUTIES

6.1 The council is required to meet a wide range of statutory equalities duties. This section outlines our legal responsibilities. The core provisions of The Equality Act 2010 came into force on 1 October 2010, but with the change in government the timetable for implementation of the remainder of the act is uncertain. This section therefore deals with law as it stands at January 2010, whilst anticipating the remainder of The Equality Act. It will be amended if the legal position changes. For the avoidance of any doubt, if the legal position changes during the life of this scheme, the council will, at all times, commit to complying with the relevant legal provisions.

6.2 The Equality Act 2010 simplifies and brings into one act existing discrimination law. It prevents discrimination against persons with "protected characteristics" and must be complied with by employers and all organisations providing services or undertaking public functions.

6.3 Protected characteristics are:

- Race
- Disability
- Sex
- Religion or belief
- Age

- Sexual orientation
 - Gender reassignment
 - Marriage or civil partnership
 - Pregnancy and maternity
- 6.4 All types of discrimination, whether direct or indirect discrimination, harassment or victimisation, are prohibited.
- 6.5 It is important that Peterborough City Council can demonstrate that it has arrangements in place for ensuring:
- compliance with established policies, procedures, laws and regulations,
 - activities are conducted in accordance with proper standards of conduct, and
 - efficient and effective management of resources.
- 6.6 This scheme sets out how the council will meet its statutory obligations, and includes an action plan setting out our timetable for doing so. As the action plan will be reviewed annually, it covers a one year period.
- 6.7 Some of the council's commitments to prevent discrimination for specific groups are set out below.
- 6.8 Race
- 6.8.1 The council will promote race equality by:
- eliminating unlawful racial discrimination.
 - promoting equality of opportunity between persons of different racial groups, and
 - promoting good relations between persons of different racial groups.
- 6.8.2 "Institutional racism" was defined in the MacPherson Report (1999), as: "The collective failure of an organisation to provide an appropriate professional service to people because of their colour, culture or ethnic origin. It can be seen in processes, attitudes, behaviour which amounts to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantages minority ethnic people".
- 6.8.3 The report stated that "Institutional racism persists because of the failure of organisations to openly and adequately recognise or address its existence and causes, due to their values, policies, practice and leadership. Without recognition and action to eliminate such racism it can prevail and thrive as part of the ethos or culture of the culture of the organisation".
- 6.8.4 The council adopts this definition of institutional racism and through its Single Equality Scheme, commits to ensuring that it is not allowed to exist in the council.

6.8.5 The council monitors by racial group the numbers of:

- applicants for employment, training and promotion, and
- staff in post.

6.8.6 In addition, as it employs more than 150 full-time staff, it must also monitor by racial group staff who:

- benefit or suffer detriment as a result of performance assessment procedures.
- cease employment.
- are involved in grievance procedures.
- are the subject of disciplinary procedures, and
- receive training.

6.8.7 The results of the above monitoring are analysed, with action taken if differences identified and are published annually. The data collected is used to show that the council is actively meeting the general duty in employment functions.

6.9 Disability

6.9.1 The council will promote equality for people with disabilities. This means that, in carrying out its services and functions, it will have due regard to the need to:

- promote equality of opportunity between disabled people and others;
- eliminate unlawful disability discrimination;
- eliminate harassment of disabled people that is related to their disabilities;
- promote positive attitudes towards disabled people;
- encourage participation by disabled people in public life; and
- take steps to take account of disabled people's disability, even where that involves
 - treating the disabled person more favourably than other people;
 - conduct equality impact assessments to assess the likely impact of policies and practices or proposed policies and practices on disabled people;
 - show what actions are taken in the scheme, and what appropriate outcomes are achieved; and
 - report on progress and revise the scheme.

Guidance on what is meant by a disability is attached at **Appendix 1**.

6.10 Sex

6.10.1 The council will actively consider the ways men and women are treated and make sure they are treated equally. This does not necessarily mean treating them the same but looking at their needs and addressing them. The council will have due regard to the need to:

- eliminate discrimination and harassment;

- promote equal opportunities between men and women;
- In formulating its overall objectives, consider the need to include objectives to address the causes of any gender pay gap;
- gather and use information on how its policies and practices affect gender equality in the workforce and in the delivery of services;
- consult stakeholders (that is, employees, service users and others, including trade unions) and take account of relevant information in order to determine its gender equality objectives;
- assess the impact of its current and proposed policies and practices on gender equality;
- implement the actions set out in its single equality scheme action plans;
- publish equality impact assessments of all major policy developments.

6.11 Religion and belief

6.11.1 The council will eliminate discrimination and harassment either directly or indirectly, against anyone on the grounds of religion or belief. It will also offer protection to people who do not have a faith. It will ensure equal treatment both in the workplace, and in relation to goods, facilities and services. The council will have due regard to the need to:

- eliminate discrimination and harassment;
- gather and use information on how its policies and practices affect religion and belief in the workforce and in the delivery of services;
- assess the impact of its current and proposed policies and practices on religion and belief;
- implement the actions set out in its single equality scheme action plans;
- publish equality impact assessments of all major policy developments.

6.12 Age

6.12.1 The council recognises the importance of retaining valuable employees and will not use age, or age-related criteria in recruitment and selection. The age profile of the workforce is monitored and this information will not be used in relation to employment decisions, but used for monitoring purposes only. The council will have due regard to the need to:

- eliminate discrimination and harassment;
- gather and use information on how its policies and practices affect age in the workforce and in the delivery of services;
- assess the impact of its current and proposed policies and practices on age;
- implement the actions set out in its single equality scheme action plans;
- publish equality impact assessments of all major policy developments

6.13 Sexual orientation

6.13.1 From January 2011, the council started monitoring sexual orientation as part of recruitment monitoring and will also review options to collect this data for existing staff during 2011/12. It will then consider how to eliminate discrimination and

harassment on this basis, as part of the action plans associated with this single equality scheme.

6.14 Gender reassignment

6.14.1 From January 2011, the council started monitoring gender reassignment as part of recruitment monitoring and will also review options to collect this data for existing staff during 2011/12. It will then consider how to eliminate discrimination and harassment on this basis, as part of the action plans associated with this single equality scheme.

6.15 Marriage or civil partnership

6.15.1 The council will eliminate discrimination and harassment either directly or indirectly, against anyone on the grounds of marriage or civil partnership. It will ensure equal treatment both in the workplace, and in relation to goods, facilities and services. The council will have due regard to the need to:

- eliminate discrimination and harassment;
- gather and use information on how its policies and practices affect those who are married or in a civil partnership, and those who are not, in the workforce and in the delivery of services;
- assess the impact of its current and proposed policies and practices on marriage and civil partnerships;
- implement the actions set out in its single equality scheme action plans;
- publish equality impact assessments of all major policy developments.

6.16 Pregnancy and maternity

6.16.1 The council will actively consider the ways women are treated in relation to pregnancy and maternity and make sure they are treated equally. This does not necessarily mean treating them the same but looking at their needs and addressing them. The council will have due regard to the need to:

- eliminate discrimination and harassment;
- promote equal opportunities;
- gather and use information on how its policies and practices affect pregnancy and maternity in the workforce and in the delivery of services;
- consult stakeholders (that is, employees, service users and others, including trade unions) and take account of relevant information in order to determine its pregnancy and maternity policies;
- assess the impact of its current and proposed policies and practices on pregnancy and maternity;
- implement the actions set out in its single equality scheme action plans;
- publish equality impact assessments of all major policy developments

6.17 Socially disadvantaged groups

6.17.1 There are no formal requirements to give consideration to socially disadvantaged groups as part of equality legislation. However, the council recognises that there are groups who are socially disadvantaged from mainstream society. These include those on low pay, those in poverty and those with limited mobility. The council aims to address the particular needs of these groups in all its activities.

7 EQUALITY IN SERVICE PROVISION.

7.1 Equality is an important vehicle for delivering improvement in the effectiveness and efficiency of public services. It helps to ensure that investment in public services is targeted to those who are intended to benefit from them. It is not about providing the same service to all, but about providing services that are sensitive to difference. A fundamental objective of the continued development of this scheme will be to identify where this could be happening and to put measures in place to address it in the action plan.

7.2 To ensure equality in service provision, the council is committed to the following:

- Interaction with the public – staff will be fully trained to understand the principles, practices and policies related to equality and diversity
- Access to council buildings – the council will work to ensure that as far as is reasonably practicable buildings from which a public service is delivered are accessible to people with disabilities
- Service delivery – the council will seek to ensure equality of access and will strive to meet people’s specific needs
- Monitoring take-up of services – wherever practical the take-up of services will be monitored to ensure that no-one is disadvantaged because of any of the protected characteristics
- Access to information – information about services, policies and practices will be available in a range of different formats so as not to disadvantage any group or individual
- Charges for services – when charges are made for services the council will recognise this may have an impact on people on low incomes and will consider offering concessions where appropriate
- Community engagement – the council will, where appropriate, consult with organisations and individuals who are able to represent their community in order to help develop policies and services.

7.3 To improve the way in which services are delivered, the council has adopted a set of Corporate Customer Service Standards. Furthermore, it is committed to providing accessible, responsive services for all of its customers. The aim is to ensure that customers will not have difficulty accessing services because of disability, understanding or language. The Customer Service Standards provide guidelines on how the right level of assistance can be provided to those who may need additional help, for whatever reason. This will ensure that all people in the area have equal access to services. As part of its commitment to equality and diversity, the council seeks to meet the communication needs of all its stakeholders. In recognition that printed English is not always the most

appropriate means of consultation, efforts will be made to communicate in different ways to people whose first language is not English (although the council will not routinely translate all of its communications). The council will consider, where appropriate, all measures that might be used to ensure effective communication of relevant information to all members of the community. This includes web-based support services. Information about and support in accessing council services will be made available on request in appropriate formats. The council will continually and rigorously monitor access to information and services to ensure equality of opportunity.

- 7.4 The council will actively promote a welcoming and harmonious environment, equality of opportunity and good relations between all sections of the community in Peterborough in all its offices, especially those open to the public. It will work to secure a fully accessible environment for the benefit of all, and in particular those with mobility difficulties.

8 EQUALITY IMPACT ASSESSMENT

- 8.1 The council has a legal requirement to consider the impact of some aspects of its work on those having the protected characteristics. In order to meet this requirement it undertakes Equality Impact Assessments (EqIAs). An impact assessment is a systematic way of finding out whether a policy (existing or proposed) or a service (existing or proposed) has a differential impact when applied to different groups or individuals. It considers all the strands of equalities, and allows a full account to be taken of the needs and experiences of those affected by policies and:

1. achieve better results generally;
2. identify actual and potential inequalities; and
3. respond appropriately to these inequalities.

- 8.2 The purpose of an EqIA is to improve the council's work by making sure it does not discriminate and, that where possible, it promotes equality. It is a way to make sure that careful thought is given to the likely impact of its work on people in the community and action is taken to improve strategies, policies and projects, where appropriate. It involves anticipating the consequences of strategies, policies and projects on these groups and making sure that, as far as possible, any negative consequences are eliminated or minimised and opportunities for promoting equality are maximised.

- 8.3 All new policies plus those under review should undertake an EqIA. A two-stage process has been developed which is outlined at **Appendix 2**. In stage one the project or policy goes through a screening process, and in stage two it undergoes a more thorough assessment with the relevant departmental management team responsible for this. Elected members are involved in the process as appropriate. This demonstrates corporate engagement and commitment in the equality impact assessment process. The full EqIA form is included in the appendix. (A full

impact assessment may not be necessary in every case). Services are responsible for undertaking a risk assessment and identifying which areas of their work require an EqlA. The compliance and ethical standards team will maintain a web-based copy of all completed EIAs.

9 EQUALITY IN EMPLOYMENT

- 9.1 The council is one of the largest employers in Peterborough, and aims to provide an example of best practice to other employers in ensuring employment opportunities are available to all without prejudice or discrimination.
- 9.2 All employment processes such as recruitment, selection, appraisal, training and career progression, together with disciplinary processes, are based solely on the individual's ability and suitability for the work. An anonymous system of shortlisting of job applicants has been introduced to assist in this process. Managers strive to ensure the workplaces are free from all forms of discrimination and unacceptable behaviour. Workforce monitoring of our incoming staff is carried out, although existing staff are not regularly monitored. There are policies in place which recognise the family commitments that employees may have, including flexi-time, a home working policy, and the right for all staff to request flexible working.
- 9.3 All employment policies will be reviewed as part of the action plan, to ensure that they are consistent with the law and emerging best practice. Once this has been done they will be kept under regular review.
- 9.4 The council is proud to display the two tick symbol which shows that it is positive about the recruitment of disabled people. Job details are available in different formats if requested. Disabled applicants are identified through the Equal Opportunities Monitoring Form, and will be guaranteed an interview (for which special arrangements can be made if necessary) if they meet the essential criteria. On appointing a disabled person, the line manager is responsible for carrying out any necessary reasonable adjustments, and will be given support to enable this to be done.

10 EQUALITY IN PROCUREMENT

- 10.1 The council will adhere to its principles of non-discrimination and equality in all its procurement decisions. Similarly, it expects those supplying services on its behalf to adhere to its principles of equality and diversity. It will ensure that all contracts are delivered in a way that is non-discriminatory and promotes equality of opportunity for staff, the public and businesses. The contract regulations state that all written contracts must contain clauses requiring the contractor to comply with current equalities legislation.

11 WORKING WITH PARTNERS

- 11.1 The council works in partnership with a number of other organisations. Key partnerships include the Local Strategic Partnership (Greater Peterborough Partnership), town and parish councils, other councils, voluntary organisations

and community groups. The council is committed to promoting diversity and equality of opportunity in all such arrangements.

11.2 The council regularly consults with the community on a wide range of issues, to ensure our services are meeting the community needs. In carrying out consultations it will:

- ensure consultation methods are accessible for all groups, including under-represented groups whenever reasonably practicable
- ensure exercises are well managed with clear aims and timetable
- consult service users when developing policies
- publish results in an open and accessible way

12 IMPLEMENTING THE SCHEME

12.1 The scheme is wide ranging, and therefore relies on a number of sources to deliver it successfully.

12.2 Elected members: in their role as community leaders, all councillors need to be aware of the council's equalities policies, and the different needs of the communities that they represent

12.3 Cabinet: responsible for approval of equality policies

12.4 Human Resources: responsible for equality monitoring and delivery of employment policies that reflect the SES and the council's commitment to it

12.5 Corporate Management Team (CMT): responsible for overall management of the SES and work that relates to it

12.6 Heads of service: responsible for ensuring that the SES is implemented within their teams both for their employees, and the services that they provide

12.7 Creating Opportunities and Tackling Inequalities Scrutiny Committee: holding the cabinet to account for the progress of equality performance and scrutinising Equality Impact Assessments

12.8 Peterborough Diversity Forum: responsible for liaising with partner organisations and interested groups to ensure the council continues to meet local needs.

13 RESPONDING TO INCIDENCES OF DISCRIMINATION

13.1 The council is committed to eliminating all aspects of discrimination from its services, but recognises that they may occasionally occur, or that individuals may perceive that they have occurred. It therefore needs to maintain policies that ensure that they are dealt with in a fair, equitable and sensitive manner.

- 13.2 Complaints from employees will be dealt with under the grievance and disciplinary policies. Complaints from members of the public will be dealt with under the complaints procedure.
- 13.3 The council has implemented a Single Status Agreement in respect of pay and conditions, and a common job evaluation scheme is used to assess the grade of each post.

ANNEXE 1: DEFINITION OF “DISABILITY”

This is taken from the Statutory Codes of Practice linked to the Equality Act 2010 and is intended to aid understanding of who is regarded as disabled for the purpose of equalities legislation

A person is disabled if they have a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day to day activities. Impairments include sensory impairments such as those affecting sight or hearing. People who have had such a disability are protected even if they have since recovered.

Mental impairments cover a wide range of impairments relating to mental functioning, and include learning difficulties.

“Substantial” means something that is more than minor or trivial. It is something that goes beyond the normal differences in ability which might exist among people.

“Long-term” impairment is one which:

- has lasted at least 12 months, or
- is likely to last for more than 12 months in total, or
- which is likely to last for the rest of the life of the person affected.

If the effect comes and goes, it is treated as continuing if it is likely to recur, that is, if it is more probable than not that it will do so.

“Normal day to day activities” are those carried out by most people on a fairly regular and frequent basis, the broad categories of which are as follows:

- ability to lift, carry or otherwise move everyday objects
- continence
- manual dexterity
- memory or ability to concentrate, learn or understand
- mobility
- perception of the risk of physical danger
- physical co-ordination,
- speech, hearing or eyesight.

Treatment that alleviates the effects is ignored, except for the impact of spectacles or contact lenses on vision.

People with severe disfigurements are covered and do not have to demonstrate that the impairment has a substantial adverse effect on their ability to carry out normal day to day activities.

People with the following are automatically treated as disabled:

- HIV infection

- cancer
- multiple sclerosis
- registered blind or partially sighted

“Progressive conditions” are covered from the point at which the condition has some effect on the ability to carry out day to day activities, even if it is not a substantial effect, providing the progressive nature of the condition is eventually likely to lead to a substantial adverse effect on such ability.

“Exclusions” include dependency to alcohol, nicotine, or any other substance; exhibitionism; seasonal allergic rhinitis; tendency to physical or sexual abuse of another; tendency to set fires; tendency to steal; voyeurism.

ANNEXE 2: EQUALITY IMPACT ASSESSMENT PROCESS (This document has four appendices marked A1, A2, A3 and A4)

MANAGEMENT GUIDELINES:- Framework for Equality Impact Assessments

These guidelines are to provide you with helpful information to assist you in undertaking Equality Impact Assessments and are not intended to amount to legal advice.

1.0 Purpose of this guide

Peterborough City Council requires that all policies, functions, strategies or projects^① are developed in full recognition of the diverse needs, circumstances and concerns of the people who will be affected by them. This guidance has been designed to help staff conduct Equality Impact Assessments (EqIA) on behalf of the council. Bear in mind when writing these documents that anything written may become available to the public.

2.0 What is an Equality Impact Assessment (EqIA)?

An EqIA is a way of systematically assessing the effects that a function, strategy, project or policy is likely to have on groups or individuals in respect to the equality categories set out below:

- Race
- Gender
- Disability
- Age
- Sexuality
- Religion or belief

The assessment extends to monitoring any proposed changes and consulting with the affected groups and individuals on these changes.

The main purpose is to pre-empt the possibility that the policy could affect some groups unfavourably and to consider alternative ways of achieving the same ends in a way that will cause no, or less adverse impacts.

It is vitally important that the EqIA is carried out before any strategy, policy etc. is adopted. An EqIA is designed to be a challenge process, which leaves a paper trail of evidence that could be used to justify decisions.

① Henceforth the term 'policy' will be used as an umbrella term that includes functions, strategies and projects.

3.0 Legislation

Since the Race Relations Amendment Act (2000) all public authorities have had a duty to conduct Race Equality Impact Assessments. Since 2006 this duty was expanded to include six other equality groups –
gender, disability, age, sexual orientation and religion or belief.

The Equality Act 2010 may extend this further to include gender reassignment and may also include a public sector social-economic duty.

“The Act creates a new public sector duty on public authorities, when making decisions of a strategic nature to *“have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage.”* For the council this is likely to have most relevance in design and implementation of services.

4.0 The benefits of EqlAs

An EqlA will ensure that as far as possible, policies are developed in recognition of the diverse needs, circumstances and concerns of the people who will be affected by them. The process will assist in:

- Identifying direct and indirect discrimination;
- Considering alternative policies or measures that might address any adverse impact or unmet need;
- Mainstreaming equality and diversity into policies and practices across all levels.

5.0 The EqlA Process

There are two levels of EqlA, an initial assessment and a full assessment. All policies will be subject to an initial assessment. If the subsequent outcome suggests that any groups will be differentially affected by the policy, a full assessment must be completed.

Two points to note regarding carrying out EqlAs are to:-

- Ensure these are carried out **before** any decisions have been made or implemented
- Actively involve key internal and external stakeholders and community members, including those who are vulnerable and marginalised to ensure they are integrally involved in and consulted on equalities issues and are able to challenge performance on equality issues, share experiences and evaluate the Council's progress.
- Share information in the initial and full assessments with the appropriate trade union(s)

The proformas for both levels of assessment are included as Appendix A1 and A2.

Appendix A1

Equality Impact Assessment:
Initial assessment

What are the proposed outcomes of the policy?

Which individuals or groups are most likely to be affected?

Now consider whether any of the following groups will be disproportionately affected:
[See Appendix A3 for further information](#)

Equality Group	Note any positive or negative effects
Particular age groups	
Disabled	
Male/Female	
Those undergoing gender reassignment	
Married couples or those entered into a civil partnership	
Sexual orientation	
Pregnant women or women on maternity leave	
Particular ethnic groups	
Those of a particular religion or who hold a particular belief	
Socio-economically disadvantaged	

group(s)	
----------	--

What information is available to help you understand the effect this will have on the groups identified above?

Who will be the beneficiaries of the policy?

Has the policy been explained to those it might affect directly or indirectly?

Can any differences be justified as appropriate or necessary?

Once implemented, how will you monitor the actual impact?

Policy review date	
Assessment completed by	
Date Initial EqIA completed	
Signed by Head of Service	

Appendix A2

Equality Impact Assessment:

Full assessment

Name/title of the policy area/strand or programme with which this assessment is concerned

Description/summary of the policy area/strand or programme

[See Appendix A4 for further guidance](#)

The evidence base (list the principal sources of relevant evidence, both quantitative and qualitative. [See Appendix A4 for further guidance](#))

What the evidence shows – key facts [See Appendix A4 for further guidance](#)

Challenges and opportunities

(indicate the policy's potential to reduce and remove existing inequalities)

Summary of Equality Impact Assessment

[See Appendix A4 for further guidance](#)

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Next steps [See Appendix A4 for further guidance](#)

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Policy review date	
Assessment completed by	
Date Full EqlA completed	
Signed by Head of Service	

APPENDIX A3

Protected Characteristics

Age

Where this is referred to, it refers to a person belonging to a particular age (i.e. 32 years old) or a range of ages (e.g. 18-30 year olds)

Disability

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment

The process of transitioning from one gender to another.

Marriage and civil partnership

Marriage is defined as a 'union between a man and a woman.' Same-sex couples can have their relationships legally recognised as 'civil partnerships.' Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity

Pregnancy is the condition of being pregnant. Maternity refers to the period of 26 weeks after the birth, which reflects the period of a woman's ordinary maternity leave entitlement in the employment context.

Race

Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour and nationality (including citizenship) ethnic or national origins. The following categories are currently used on recruitment application forms.

Group	Type	Group	Type
White	British/English/Scottish/Welsh Irish Italian Portuguese Other European Traveller Other White background	Asian or Asian British	Bangladeshi Indian Kashmiri Pakistani Other Asian background
Black or Black British	African Caribbean Other Black background	Other ethnic group	Chinese Other background
Mixed	White and Asian White and Black African White and Black Caribbean Other Mixed background		

Religion and belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Religious groups

Christian	Muslim
Hindu	Sikh
Jewish	Other

Sex

A man or a woman.

Sexual orientation

Where a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Gay man	Bisexual
Gay woman/lesbian	Heterosexual

Appendix A4

Describing a policy area, strand or programme

Write a summary of the policy, bearing in mind that what you write is a public document, not a file note for yourself or an internal memo for colleagues.

It follows that people reading the description will not necessarily be familiar with educational acronyms and abbreviations. All acronyms and abbreviations should therefore be spelled out in full the first time they are used.

Although they may not be specialists in your area of expertise, the people reading the description may well have specialist knowledge relating to equality issues. Your purpose, in these paragraphs about your policy, is to provide such people with sufficient preliminary information for them to follow the discussion that will follow.

You probably do not need to write more than about 300 words altogether – three or four short paragraphs.

Other things being equal, it will be appropriate to outline the following:

- the policy's rationale and purposes
- how it operates, or will operate, in practice
- the historical background, for example when it began or will begin, and reference to any pilots or trials
- how the policy fits in with other policies, for example whether it is a strand within a larger policy area
- an indication of the size of the budget
- sources of further information.

With regard to sources of further information, please make sure you give sufficient details for them to be easily followed up – paragraph or page references within a document, and URLs for documents that can be accessed online.

Types and sources of evidence

An EqIA should name, with full bibliographical details as appropriate, the principal sources of relevant evidence which have been consulted. The principal types of relevant evidence are summarised below.

Please note that the word 'evidence' is used here in the broad sense. There are many kinds of evidence, that is to say, ranging from substantial academic research to accounts of personal experience and viewpoint by individuals and groups.

It is relevant to note and use the familiar distinction between quantitative evidence and qualitative. The term **quantitative** refers to a type of information based in quantities or else quantifiable data (objective properties) —as opposed to **qualitative** information which deals with apparent qualities (subjective properties). There are further notes on the distinction below.

Quantitative evidence

Quantitative evidence is mostly about relative levels of participation, involvement and take-up, or else about outcomes, successes and failures.

Quantitative evidence is derived from administrative data collected, for example, from local authority returns, census data etc.

In addition to quantitative evidence about participation and outcomes, it may be relevant to cite also the results of opinion surveys of various kinds.

Qualitative evidence

The principal **types** of qualitative evidence include:

- case studies and project evaluations
- literature reviews
- interviews and focus groups i.e. statements of concern and opinion from stakeholders
- inspection reports
- views, proposals, recommendations and good practice guides
- responses to Green Papers and White Papers
- responses to draft equality impact assessments.

The principal **authors** of qualitative evidence include:

- research centres and units based in universities (academic research)
- specialist consultancy organisations
- the three equality commissions (CRE, DRC and EOC) and, more recently, the Equality and Human Rights Commission (EHRC)
- other government departments
- interest and advocacy groups, including trade unions and professional associations, specialist organisations, and associations and alliances representing concerns around any of the protected characteristics.

What the evidence shows

This should detail:-

- which diverse groups have been identified as being disadvantaged by the proposals together
- what consultation has taken place
- a summary of the negative impacts
- the proposed changes as a result of the research and or consultation
- whether the changes to the policy lower the negative impact
- whether the changes provide opportunities to promote equality of opportunity and improve relations between diverse groups?

Summarising an assessment of impact

In the light of evidence make an assessment.

We suggest you copy and paste one of the following statements into your document, and then expand and explain it as appropriate.

- A. A positive impact is explicitly intended and very likely.
- B. An adverse impact is unlikely, and on the contrary the policy has the clear potential to have a positive impact by reducing and removing barriers and inequalities that currently exist.
- C. An adverse impact is unlikely. On the contrary there is potential to reduce barriers and inequalities that currently exist. There is insufficient evidence, however, for this assessment to be made with as much confidence as is desirable.
- D. Adverse impact is unlikely, but positive impact is also unlikely.
- E. Adverse impact is probable or certain, since certain groups will be disadvantaged, either proportionately or absolutely, or both. Remedial action is therefore necessary.
- F. Adverse impact is probable or certain for certain groups but the policy as a whole can nevertheless be justified.

PLEASE NOTE

If you select the last of these assessments it will be necessary to obtain legal advice.

Next steps

An EqIA should conclude by indicating clearly the ways in which it will be followed up and kept under review i.e. progress detailed in a project plan, objectives set in an employees PDR/appraisal etc.

So far as is appropriate, the statements about next steps should reflect SMART principles – the measures should be:

- specific
- measurable
- achievable
- realistic
- time-bound

The statement of next steps should also emphasise the equality impact assessment as a whole is a living document and that, accordingly, it will be revised and updated, as appropriate, in the light of further evidence, discussions and representations.

You are likely to mention some or all of the following:

- plans that are already under way or under active consideration to address challenges and priorities you have highlighted
- arrangements for monitoring, and for periodic reports to certain groups
- arrangements for ensuring that monitoring systems are in place to ensure regular checks are undertaken on the effects of the policy
- arrangements for ensuring that evaluations of any pilot projects take account of the concerns and discussions outlined in your assessment
- arrangements for discussing with other agencies and regulatory bodies the scope for taking account of the concerns and discussions in your assessment
- arrangements for ensuring that your assessment is brought to the attention of all relevant colleagues, and in this contributing to reviews of the Department's single equality scheme
- arrangements for disseminating information about your assessment to local authorities and other stakeholders
- arrangements for improving the information base
- intentions for drawing up a detailed action plan.

ANNEXE 3: RELATED EMPLOYMENT POLICIES AND PROCEDURES

This section should refer to related employment policies & procedures, including:

- Disciplinary
- Grievance
- Annual leave
- Attendance & sickness
- Conduct & standards
- Employee relations
- Equality & diversity
- Flexible working
- Managing change
- New starters
- Retirement
- Secondment
- Special benefits
- Special leave

And other employee related policies & procedures

In the formulation of all employee related policies and procedures, the Council will have regard to its obligations under its Single Equality Scheme, and will regularly review them to ensure they remain compliant with both the scheme and the general law.

ANNEXE 4 - EQUALITY ACTION PLAN - 2011 -2012

Action	Reason for Action	Accountability	Timescales	Success measures	Equality strand	Progress
Leadership & Awareness (Note that a number of these actions were included in previous equality schemes and remain relevant)						
1 Raise visibility and awareness of equality and diversity within the council. Promote the Single Equality Scheme (SES) and Single Equality Action Plan (SEAP).	Need for council to demonstrate its commitment	Equality and Diversity Group leads	Ongoing	More visible information about equalities and wide awareness of the SES and how all teams and individuals contribute.	ALL	Insite intranet is developing and regular staff briefings.
2 Review branding with a view to embedding equality in council literature	Need for outside “audiences” to understand council’s commitment	Communication Team	Ongoing	More visibility for equalities issues in council literature.	ALL	
3 Consider measures to promote equality and diversity at the council including an awareness day, activities around Ban Bullying at Work day, International Women’s Day, LGBT History Month, Black History Month, Holocaust Day	Need to promote equalities	Led by HR with involvement from other departments and partners	Ongoing	Minimum of two events delivered during the year and awareness raised	Depends on event focus	

Action	Reason for Action	Accountability	Timescales	Success measures	Equality strand	Progress
4 Improve the equalities pages on the council's website	Feedback indicates that improvement is needed and the volume of information published is currently limited	Communication team – website lead + HR lead	Ongoing	Increase in quantity of information on the website, increased number of hits on site, less Freedom of Information requests since information easily available	All	
5 Work with new and existing councillors to raise awareness of equality and diversity issues (an action in the previous race equality scheme which remains relevant)	The leadership role of city councillors is important to champion equalities	Helen Edwards	End September 2011	Awareness sessions held and feedback received on impact	All	
Workforce and Human Resources						
6 Maintain “two ticks” scheme and encourage adherence to its principles	Explicit commitment to a standard - demonstrates the council's commitment to equalities in recruitment	HR – Chris Taylor	Ongoing	Scheme accreditation maintained	Disability	Accreditation maintained in 2010
7 Review of procedures for sharing and disseminating support information for staff with disabilities amongst staff and review support	Enhancing staff disability awareness; maximising support.	HR – Chris Taylor	By end September 2011	Review complete and new systems in place	Disability	

Action	Reason for Action	Accountability	Timescales	Success measures	Equality strand	Progress
available						
8 Further explore interest for a staff network (consult partners and other local authorities given previous lack of interest – an action in the previous race equality scheme and disability scheme)	The council does not have any staff networks linked to minority groups	HR – Chris Taylor	By end June 2011	Feedback obtained and decision taken on the way forward	Depends on views of those consulted	
9 Undertake “Tracking of Posts Project” – review a sample of vacancies	Ensure legislative requirements being met and that there is good practice in recruitment	HR – Chris Taylor	By end June 2011	Review completed.	All	
10. Ensure that equalities issues are included in induction processes.	To make clear the council’s commitment to all new staff	HR – Colin Wilson	Ongoing	Equalities issues included in induction	All	
11 Consult on and consider the specific needs of staff who work flexibly, including part-time and term-time only staff to identify appropriate support mechanisms	Ensure options meet needs.	HR - Chris Taylor	By end December 2011	Consultation undertaken. Recommendations made on support needed.	Gender	
12. Ensure conduct prohibited under	Ensure compliance with statutory duties	HR – Chris Taylor	By end June 2011	Updated policy with communication to	All	

Action	Reason for Action	Accountability	Timescales	Success measures	Equality strand	Progress
Equality Act 2010 is embedded in Disciplinary Policy and sanctioned and monitored accordingly				staff		
Policies & Procedures						
13. Report quarterly on progress against Single Equality Scheme	To provide visibility of progress against the plan	Equality and Diversity Group – Denise Radley	Quarterly	Reports available on website	All	
14. Ensure completion of impact assessment where needed, and follow up action taken	To continue to improve the usefulness of equalities impact assessments	Equality and Diversity Group leads	Ongoing	All impact assessments published in accessible place on website and further increase in the quantity and quality of assessments	All	
15. Audit all policies to ensure compliance with the Equality Act 2010	Ensure compliance with statutory duties	HR – Chris Taylor	Rolling prog 2010/11	Updated policies and procedures	All	
16. Publish an annual workforce monitoring report	To track trends in the workforce and inform Single Equality Scheme in relation to workforce matters	HR – Chris Taylor	Annual	Report published and used to inform 12/13 action plan	All	
17. Identify capacity within the council to	To address the limited capacity	Denise Radley	End September	Additional capacity identified and in	All	

Action	Reason for Action	Accountability	Timescales	Success measures	Equality strand	Progress
support the updating of the Single Equality Plan, its action plan and other over-arching equalities documents	available to do this through departmental leads		2011	place		
18. Audit all projects to ensure Equality Impact Assessments (EqIAs) completed	Ensure compliance with statutory duties	Democratic Services – Helen Edwards	By end June 2011	More robust monitoring system in place linked to council decisions for improved tracking	All	
19. Develop and implement a geographical database ('neighbourhood window') to share information and data across partners	To bring together information and data collected across a range of partners in order to make better use of this for reviewing the characteristics of neighbourhoods, making decisions, resolving issues, predicting the future, monitoring the effectiveness of plans and identifying opportunities	Strategic Improvement – Helen Todd	Ongoing	Number of hits, number of reported users, data used to inform a range of plans and the 12/13 Single Equality Scheme action plan.	All	The neighbourhood window is now live with sign up from PCC, Serco, Cambridgeshire Fire & Rescue and Cambridgeshire Constabulary.
20. Monitor the implementation of the policy on translation	The city council budget consultation identified concerns	Helen Edwards	End September 2011	Report on monitoring and recommendations for	Race	

Action	Reason for Action	Accountability	Timescales	Success measures	Equality strand	Progress
and interpretation and report back to scrutiny panel (development of translation and interpretation was an action from the previous race equality scheme)	about the level of spend in this area and the council needs to ensure it meets its statutory requirements and that people can access these services as needed			action		
Access						
21. Open the new Changing Places disabled toilet in the Car Haven and publicise improved disabled access	Feedback from partners and service users identified a need for this facility in the city	Communication team	By end May 2011	Launch event has taken place and usage of and feedback on this facility	Disability, carers	The building is nearing completion
22. Review physical access to council owned buildings	To improve access where reasonably possible	Property team	Rolling prog 2011/12	Clear prioritisation of possible improvements supported by consultation	Disability	
23. Work with partners to open a new community hydrotherapy pool in Peterborough	Feedback from the public about lack of a facility	Paul Phillipson	End May 2011	Community facility open and in use	Disability, carers	Pool ready for use
24. Deliver a conference and workshops on financial inclusion	To ensure financially excluded individuals and groups are given information and	Neighbourhood Services – Leonie McCarthy	End June 2011	Number of attendees, take-up of benefits, implementation of new policy	Economic Disadvantage	

Action	Reason for Action	Accountability	Timescales	Success measures	Equality strand	Progress
	access to services to increase opportunities for welfare and work					