

LONDON BOROUGH OF BROMLEY

Legal Democratic and Customer Service Department

**EQUALITY IMPACT
ASSESSMENT**

**STANDARDS AND ETHICAL
GOVERNANCE**

**Prepared by: Sheila Bennett, Asst Director, Democratic and
Customer Services**

Last reviewed: Nov 2008

Approved by Standards Committee 2 December 2008

Part 1 - THE POLICY

1.1 Briefly describe the aim of the policy:

The Council aims to demonstrate an open and honest system of local governance, with councillors adhering to the national Code of Conduct. Our Standards Committee aims to promote and maintain high standards of conduct in all the Council's activities.

The Council is aiming to

- Increase the profile of ethical governance issues both internally and externally;
- Introduce changes to the standards regime (e.g. handling complaints about councillors locally) in an effective way, ensuring it is and remains accessible to all sections of the community, councillors and to people working for the Council

1.2 Set out the policy objectives:

- To increase the profile of ethical governance issues internally and externally
- To introduce and undertake local filtering and handling of complaints against councillors effectively
- To ensure that information on these processes is easily accessible to all sections of the community so that people with concerns to raise can do so easily and effectively
- To monitor and review the procedures to identify any shortfalls and to take appropriate remedial action
- To achieve confidence amongst the community as a whole, and different groups within it, in the way the Council will handle ethical governance issues

1.3 Break down the policy into its key areas:

- Promoting ethical governance internally and externally
- Devising and promoting effective procedures for local filtering/handling of concerns

1.4 List the intended recipients of the policy:

- Residents or businesses in the Borough
- Service users
- Local community groups/organisations
- Partner organisations
- Councillors/committee members
- Political Parties
- Council staff at all levels
- Standards Board for England

1.5 Identify partner organizations and any other departments involved in delivering the policy:

- Monitoring Officer
- Democratic Services Team
- Legal Services
- Communications and Bromley Knowledge Teams
- Councillors and senior officers
- Raising Concerns and Getting It Right departmental representatives
- Councillors
- Leader and Executive
- Standards Committee members (councillors and independent)
- Executive and Resources PDS
- Audit Sub-Committee
- Political parties
- Standards Board for England

1.6 Identify and list any stakeholders concerned with the delivery of the policy:

- Residents
- Staff at all levels
- Councillors
- Monitoring Officer
- Standards Committee members
- Political parties
- Local community groups
- Businesses
- Auditors (local and national)
- Standards Board for England

1.7 Identify any constraints and developments concerned with the delivery of the policy:

- The processes involved in the ethical governance framework and ensuring local compliance are founded in legislation (although there is some leeway in establishing the details of local arrangements).
- Interest in ethical governance issues is likely to come to the fore in response to potential problems, rather than being a major issue for local people on an ongoing basis; this presents challenges in promoting these processes and building detailed awareness of our arrangements on an ongoing basis.

1.8 Identify any research or consultation that has been carried out concerned with the delivery of the policy:

- Provision of these functions is governed by legislation
- Audits of local arrangements in 2005 and 2007 showed a growing confidence in, and awareness of, these issues, and that frameworks and processes in place were sound. However this research was internal (covering councillors and senior managers only)
- The General Satisfaction Survey carries a local question on perceptions of how trustworthy the Council is. Which has been tracked over 3 years from 2005 – whilst sample sizes for sub-groups need to be treated with some caution, the overall direction is positive

1.9 Identify information gathering and data collection systems that are in place to monitor the usage and effectiveness of the policy:

- General User Satisfaction perception question (to be carried forward into the Place Survey, having received to Local Strategic Partnership (LSP) agreement)
- Internal survey returns from future ethical governance audit reviews or from any corporate staff survey undertaken in the future
- Partner/local group feedback on issues of relevance to them
- Number of complaints raised, investigated and upheld
- Monitoring information on the demographic characteristics of those using the processes
- Other ethical indicators including Ombudsman complaint data, whistle-blowing incidents reported, employment tribunal cases, etc
- Standards Committee Annual Report
- Feedback from participants in events to promote these issues
- Quarterly reports to Standards Board

Part 2 - EQUALITY ISSUES OF THE KEY AREAS OF THE POLICY

Key Area & Equality Category	Detailed evidence, information, data, analysis	Evidence to demonstrate that the Service does not discriminate against equality category	Changes that can be made in order to remove or substantially reduce negative impact
<p>Promoting ethical governance internally</p>	<p>The recent audit survey findings were below national averages since</p> <ul style="list-style-type: none"> ○ 1:5 of Council staff still expressed reservations about councillors keeping a confidence ○ 1:4 councillors and officers surveyed did not know about the Standards Committee ○ 1:3 staff were not confident that its work added value to the work of the Council ○ 1:2 staff were not clear whether the standards committee work had a positive effect on the way local people viewed the Council ○ 1:5 officers and 70% of councillors were not aware of whether induction training covered ethical issues 	<p>No sub-samples were provided indicating whether there were any differences in findings between different groups amongst staff or councillors</p>	<p>Ensure that ethical governance issues are promoted actively to all staff, both through general communications channels (newsletters, briefings, etc) and specific ones (e.g. a slot on new style induction programme being introduced in September 2008)</p> <p>Ensure that ethical governance material is written in plain language, made accessible through the intranet and other channels, and that clear links are made with the existing Raising Concerns procedure to ensure that they are complementary</p> <p>Identifying any opportunities to include ethical governance questions in future staff surveys, to enable staff perceptions to be tracked and analysed to identify any specific areas for further action</p>

			Party groups to be encouraged to ensure councillors are aware of arrangements and participate in training
Promoting ethical governance externally	<p>General Satisfaction Survey results indicate</p> <ul style="list-style-type: none"> ○ Ethical governance question is only completed by 6:10 respondents, indicating that it is not an issue many people have a view on ○ Trend data shows a positive shift in perceptions overall (63% in 2007 as opposed to 56% in 2005 saying they felt we were trustworthy) ○ people tend to be more positive with age (72% for 65+ group as opposed to 52% amongst under 35s) ○ historically women have been less positive although in 2007 this was more balanced ○ non-white respondents look more positive than white ones (average 2005-7 shows 67% non-white as opposed to 59% white) although sample sizes are relatively small reflecting the Borough profile 	Apart from age and geographical differences in perceptions around trustworthiness, current survey data does not show marked inequalities for other strands of equality	<p>Discussions with CYP leads on citizenship curriculum to include ethical governance in recommended material</p> <p>Development of good web material to make it accessible to those more likely to use internet access to information</p> <p>Promotion of information on these issues to local community groups (via Update, presentations, etc) to increase awareness and perception of the Council's efforts to promote and maintain good standards of conduct</p> <p>A communications plan for these issues will be devised for the Standards Committee to consider in the autumn (September 2008)</p> <p>Use of independent members of the Standards Committee in</p>

	<ul style="list-style-type: none"> ○ again, based on averages between 2005-7 having a disability seems to have no bearing on how trustworthy residents consider the Council to be ○ Geographically people in central wards are more positive, with the rural South lowest (64% to 52%) <p>Recent recruitment exercise for new Standards Committee members was more widely promoted than before, with targeted approaches to local groups, individuals, website and local press promotion, etc.</p> <p>Feedback from people who were long out of education felt that the application form used concentrated too much on these issues, and that the information on the role could have been fuller.</p> <p>The audit highlighted the need to work more closely with partners on publishing decision-making information</p>	<p>Applicants included both genders, and a wider age range than for the existing Committee membership.</p> <p>The Council is behind others in publishing information on partnership meetings' decision-making arrangements</p>	<p>promotional plans to demonstrate their role in/local participation and ownership of ethical governance outside the councillor body</p> <p>Continue to promote future vacancies in a wider way, whilst adapting the application forms and pack to provide and gather more relevant information</p> <p>These issues are already being tackled but will be highlighted further with those undertaking a Partnership Review in the Council, with the aim of getting all partnership bodies' meeting details, forward plans and decisions published on the web (March 2009 Standards</p>
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	<p>The audit highlighted the need for greater clarity on whistleblowing routes for local people (as opposed to staff)</p> <p>The audit suggested improving public access to member and officer registers of interest</p>	<p>No indication that there were disadvantages to any specific group</p> <p>No indication that there were disadvantages to any specific group – although current requirement to inspect in person at the Civic Centre could result in relative disadvantage for those with geographic or mobility issues, those working full-time elsewhere, etc</p>	<p>Committee))</p> <p>Item to go onto Council website July 2008</p> <p>Annual Whistleblowing report (September 2008) will review any other future ways to communicate this issue</p> <p>Report in September 2008 to explore ways to increase accessibility whilst acknowledging concerns about certain personal information being disclosed on health and safety grounds</p>
<p>Devising and promoting effective procedures for local filtering/handling of concerns</p>	<p>The Council was obliged to introduce new arrangements on May 8th 2008, with very little prior notice about the due date. It was therefore not possible to engage in any consultation with local groups on arrangements.</p> <p>Action has been taken to publicise the new arrangements through a variety of routes (local press, community groups' newsletter, In Touch, etc)</p>	<p>As the processes are new, we cannot comment at this stage – however, we will monitor the characteristics of those using the procedures alongside the general ethical governance survey questions mentioned above.</p> <p>We will need to produce guidance in hard copy as well as electronic, in order to ensure that the information is accessible to people who may not have easy web access.</p>	<p>We will consult with local groups as and when we run a review of the processes and their effectiveness</p> <p>Communications plan (September 2008) will seek to ensure that the procedures are promoted in both a general and a targeted way.</p>

	<p>The draft leaflet includes references to special assistance we will provide on request (e.g. adaptations to normal requirements to put complaints in writing, offer of language/advocacy assistance, etc). The complaints form also includes questions to monitor users by age, gender, ethnicity, so we can assess usage and take remedial action if we feel that any group appears to be under-represented or disadvantaged</p>		
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Part 3 - ACTION PLAN

AD D & CS – Asst Director, Democratic & Customer Services)
 AD CYP – Asst Director, Children and Young People’s department
 ACE CSI – Asst Chief Executive, Corporate Strategy and Improvement
 AD – L & SS – Asst Director, Legal and Support Services

Proposed Action	By Whom	By When	Improvement, Aim, Impact, Outcome
Bring forward a plan for active communication/promotion of ethical governance issues to all staff	AD D&CS/ Monitoring Officer	Sept 2008	To increase awareness of key issues, promote confidence in current arrangements, and provide knowledge of channels to use should concerns need to be raised
Bring forward a plan for active communication/promotion of ethical governance issues to local residents and stakeholders	AD D&CS/ Monitoring Officer	Sept 2008	To increase awareness of key issues, promote confidence in current arrangements, and provide knowledge of channels to use should concerns need to be raised
Track and analyse staff perceptions to identify any further action needed	AD D&CS	As opportunity presents	To identify any further targeted action needed
Track and analyse public perceptions via the Place Survey to identify any further targeted action needed	AD D&CS	Survey run in Autumn 2008 and annually thereafter – headline results available in Jan 2009 and thereafter	To identify any further targeted action needed
Provision of appropriate training for staff and councillors	AD D&CS/Monitoring Officer	Sept 2008 onwards	To incorporate ethical governance issues into all corporate induction sessions, to raise awareness amongst all councillors, and and to offer more detailed training on new procedures to all relevant committee

			memberscouncillors
Discussions with Children and Young People's department about including ethical governance material in citizenship curriculum resources and alongside other initiatives (e.g. Youth Council/Schools Councils)	AD D&CS/AD CYP	December 2008	To promote awareness of these issues amongst younger age groups
Promote future Standards Committee vacancies widely, targeting specific groups where possible	AD D&CS/Monitoring Officer	As required	To encourage applications from a pool of candidates as representative as possible of the Borough's population
Promote ethical governance issues in partnership decision-making through the Council's Partnership Review	ACE CSI	March 2009	To achieve consistency in transparency of decision-making across local partnership bodies
Promote whistleblowing routes to raise concerns, internally and externally – July put item onto Council website, Sept Annual whistleblowing report to bring forward any other proposals	AD L&SS/Monitoring Officer	July & Sept 2008	To provide people with concerns with clear information on how to raise them
Review access to register of member interests	Monitoring Officer/AD D&CS	Sept 2008	To provide local people with open information on decision-makers' interests in as accessible a way as possible
Consult with local groups whenever processes are reviewed	Monitoring Officer/AD D&CS	tba	To seek views from representative groups on how effective and accessible our information and processes are and to gain feedback on potential improvements

Part 4 - CONCLUSIONS

4.1 CONCLUSIONS:

The main conclusion of this assessment is that there does not currently appear to be a major issue around equalities on this issue, although work does need to be done to promote it more strongly moving forward, and to monitor take-up of the supporting procedures to identify any areas needing specific attention or targeted actions. This is an ongoing process.

4.2 Identify any further steps concerned with the installation or improvement of arrangement for monitoring the impact of the policy on equality categories:

- Hold periodic review sessions of usage/take-up
- Monitor public perceptions via Place Survey and staff perceptions through corporate staff surveys as opportunities arise
- Continue to monitor general ethical indicators
- Analyse feedback received on the information or procedures