

	<h1>Equality and Human Rights Commission Improvement Plan</h1>
	<p>August 2009</p>

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Equality and Human Rights Commission Improvement Plan

Jobcentre Plus and the wider Department for Work and Pensions (DWP) have developed an improvement plan in response to the Commission's report assessing our compliance with equality legislation, with a particular focus on equality impact assessments (publication date 8 July 2009) – http://www.equalityhumanrights.com/uploaded_files/ehrc_jobcentre_plusweb.pdf

All of the recommendations are directed specifically at Jobcentre Plus; however, some require linked action from other parts of the Department.

Background

Diversity and equality are at the heart of our business. Each year we strive to learn more about the needs of our diverse customers and staff and how to make our services accessible and appropriate for all who use them.

The EHRC report raises important issues and we are committed to addressing these and demonstrating improved compliance over the next 12 months. We welcome this work as a major opportunity to further develop our equality and diversity practice. Our dialogue with the Commission has enhanced our understanding of both the equality duties, and their expectations of public authorities. Their recommendations provide us with a practical framework in which to improve our existing compliance and build on the good practice identified in the report.

Key activities

A draft plan is included below. To assist the lay reader, a brief explanation of some of our key areas of activity are offered here:

Jobcentre Plus Diversity Challenge

This is our internal mechanism to guide and drive compliance with equality legislation throughout our business. We are currently re-designing the Challenge for re-launch later this year. The new Challenge will support our governance arrangements by providing more evidence in respect of legal compliance. It will be backed-up by guidance, awareness training and the support of our network of Diversity Business Partners.

Review of Guidance and Processes

The EHRC have offered a number of helpful comments and clarifications about the conduct of equality impact assessments. We will be working with departmental colleagues to review and update our internal guidance products and impact assessment processes to reflect their advice. This will include adopting a different approach to screening, and joint work between strategic and operational policy domains in DWP and Jobcentre Plus to make the impact assessment process more

seamless. We will also strengthen our template/toolkit product to support the identification of positive as well as adverse impacts, the inclusion of monitoring and consultation information, well defined review arrangements, and the highlighting of 'outcomes' (where modifications have been made to address identified impacts).

Learning and Development

We will be reviewing the learning and development requirements of our staff in light of the Commission's findings and developing additional support products – including commissioning a training module on the completion of Equality Impact Assessments.

Communications

We will be sharing the Commission's report with all our staff and making clear our corporate commitment to addressing their recommendations through our improvement plan. We will look for opportunities over the next 12 months to build on these messages, including at the launch of our new Diversity Challenge and during our Diversity Week.

Equality evidence base

We have worked with a contractor to review our monitoring information across key points in our staff and customer journeys. We will share our emerging findings with internal and external stakeholders, identifying priority issues and data gaps. We will disseminate this work to colleagues from across the department through the sharing of lessons learned report.

Moving beyond equal treatment/use of positive action

We will reinforce the message that treating people the same does not necessarily result in equality and encourage our staff to continue to understand and consider the needs of individuals and groups. We will review the circumstances where it would be appropriate and lawful to consider the use of positive action.

Improvement plan

The linked recommendation numbers refer to the recommendations in the Commission’s report.

	Issue	Linked recommendation	Outcome	Measures of achievement
1	Support governance arrangements with more specific and verifiable evidence of compliance	<ul style="list-style-type: none"> • 1 – Improve governance requirements • 7 – Introduce employment functions to the Diversity Challenge • 8 – Revise the Diversity Challenge to include references to codes of practice and other Commission guidance. 	Our new Diversity Challenge will provide a greater focus on identifying and addressing compliance issues and provide greater evidence of assurance. It will cover customer and HR functions. (The Diversity Challenge is our internal process to support compliance with equality legislation).	<ul style="list-style-type: none"> • New Jobcentre Plus Diversity Challenge is launched (including Human Resources (employment) functions) and includes a regular review of business data providing evidence of compliance. • Change governance provides an effective challenge function to support the timeous conduct of Equality Impact assessments. • Detailed guidance is produced to accompany the new Challenge which includes links to codes of practice etc. • Staff communication and awareness products are delivered. • Aggregated business data is collated providing baseline information.

	Issue	Linked recommendation	Outcome	Measures of achievement
2	Enhance Learning and Development support for staff	<ul style="list-style-type: none"> • 2 – Ensure staff training addresses the recommendations and observations in the Commission’s report 	Upskilled staff will have a greater understanding of their roles and responsibilities when carrying out an equality impact assessment	<ul style="list-style-type: none"> • New Equality Impact Assessment module is commissioned and delivered into the DWP portfolio. • External Contractor is commissioned to undertake research to identify diversity and equality issues within key Jobcentre Plus roles. • Research findings are used to consider an introduce improvements to diversity and equality products (including guidance, staff training, our equality impact assessment toolkit, to support key job roles – depending on findings). • No. of staff participating in Diversity Challenge awareness session. • No. of staff participating in Equality Impact Awareness Sessions.

	Issue	Linked recommendation	Outcome	Measures of achievement
3	<p>Reinforce message to consider the needs of individuals and groups. Review use of Positive Action.</p>	<ul style="list-style-type: none"> 3 – Ensure staff understand that meeting the duties will sometimes require DWP/Jobcentre Plus to go beyond mere equal treatment; by for example considering positive action measures to further equality outcomes. 	<p>Staff recognise the need to consider the needs of individuals and groups.</p> <p>Jobcentre Plus clarifies where there are appropriate and lawful opportunities to consider the use of positive action.</p>	<ul style="list-style-type: none"> All Staff communications delivered, which promote the message that ‘to treat all people equally we accept the need to treat some people differently’, including as part of the annual DWP Diversity Event, and launch of the Jobcentre Plus Diversity Challenge. Joint DWP/Jobcentre Plus review considering where the use of positive action may be appropriate and lawful in respect of staff and customers. This to include specific consideration of Disability Discrimination Act provision allowing the more favourable treatment of disabled people. Jobcentre Plus Staff Diversity Network Groups commissioned to provide content for a diversity and equality ‘virtual conference’ for Diversity Event. Evaluation of Diversity Event.

	Issue	Linked recommendation	Outcome	Measures of achievement
4	Review equality evidence base	<ul style="list-style-type: none"> 4 – Ensure that Jobcentre Plus responds to the findings of the major review of its equality evidence base 	Jobcentre Plus better understand equality issues from across its evidence base. Priority issues and data gaps are addressed. Key lessons are shared across the department.	<p>Following our work with a research contractor to review our monitoring strategy and evidence base across our staff and customer journeys:</p> <ul style="list-style-type: none"> Emerging findings are shared with stakeholders. Priority issues and data gaps are identified and addressed in a Jobcentre Plus monitoring work plan. Findings are disseminated across the Department through a Lessons Learnt paper delivered to the Departmental Equality Steering Group.
5	Development and alignment of guidance products including template/toolkit	6 – Ensure there is consistency between Equality Schemes, Diversity Challenge and Equality Impact Assessment toolkit	Equality Impact Assessments focus on impact, outcome and consider each aspect of the duties.	<ul style="list-style-type: none"> Existing DWP/Jobcentre Plus Equality Impact Assessment guidance is reviewed and rewritten in light of Commission's report. New template/toolkit is developed which builds in prompts to consider all of the learning points from the Commission report. Jobcentre Plus consultation and involvement section of its 'Working with Partners' framework is expanded.

	Issue	Linked recommendation	Outcome	Measures of achievement
		<p>9 – revise the Equality Impact Assessment guidance and toolkit to ensure:</p> <ul style="list-style-type: none"> • clearer definitions of the full range of duties; • greater clarification of roles and responsibilities; • revised screening process are included; • prompts are built in respect of consultation, monitoring and review action, third party issues and the outcomes of assessments (eg policy modifications) are clearly captured; • consideration of both positive and negative impacts, and • ensure better integration with the Diversity Challenge. 		<ul style="list-style-type: none"> • Jobcentre Plus stocktake of involvement and consultation activity completed. • Baseline data from the Diversity Challenge on the completion of equality impact assessments.

	Issue	Linked recommendation	Outcome	Measures of achievement
6	Development and integration of DWP/Jobcentre Plus Equality Impact Assessment processes	<p>9 – revise the guidance and toolkit (see above) to achieve:</p> <ul style="list-style-type: none"> • a more seamless integration across DWP/Jobcentre Plus • Jobcentre Plus to build on DWP Equality Impact Assessments where available. • DWP/ Jobcentre Plus templates to be aligned as much as possible. <p>5 – Ensure that EIAs are reviewed when they say they will be.</p>	A more seamless and strategic integration between DWP/Jobcentre Plus impact assessments is achieved; reducing repetition and introducing a better flow of information from policy to operational domains (and back again), including review activity.	<p>Undertake major joint Jobcentre Plus/DWP review of existing Equality Impact Assessment processes. Working Group to be established, delivering:</p> <ul style="list-style-type: none"> • Design and agreement of new joined-up process. • Business specific procedural guidance where needed • Awareness/learning and development products as required. • Structure/governance arrangements to support new joint process. • Number of staff participating in awareness sessions to support new processes.

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7	Communications to support the EHRC Improvement Plan		Equality responsibilities and the improvements we are making in response to the Commission's recommendations are explained and promoted effectively to all staff.	<p>Communications strategy is developed to deliver key messages including:</p> <ul style="list-style-type: none"> • Communications to support publication of the report and launch of improvement plan. • Communications to support implementation of the new Jobcentre Plus Diversity Challenge. • Staff messages for the DWP- wide Diversity Event. • Communications to promote new guidance and process arrangements. • Evaluation of Diversity Event

Glossary

Jobcentre Plus

Jobcentre Plus is an executive agency of the Department for Work and Pensions.

Department for Work and Pensions

The Department supports its Ministers in developing and implementing policies and strategies aimed at:

- people who receive benefit
- people who need help to get work
- disabled people
- older people
- people who get the State Pension.

Diversity Challenge

The Challenge is an internal process based that supports Jobcentre Plus's compliance with equality legislation and promotes diversity good practice.

Diversity Business Partners

A small network of Jobcentre Plus staff who provide support on diversity and equality matters to other areas of Jobcentre Plus business.

Diversity Event

An annual staff event across DWP to celebrate diversity.

Equality Impact Assessment toolkit

Guidance to support Jobcentre Plus staff working through the equality impact assessment process.

“Working with Partners” framework

Guidance for Jobcentre Plus staff setting out the Jobcentre Plus approach to partnership working with external organisations.

Assurance process

A system where senior managers confirm that, for example, equality impact assessments have taken place where appropriate.