



European Foundation for the Improvement of Living and Working Conditions

Case Study on Diversity Policy in Employment and Service Provision

Wolverhampton, UK



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Foreword

This report is part of the European Foundation for the Improvement of Working and Living Conditions (Eurofound) project "Cities for Local Integration Policy" (CLIP), which started in 2006.

Wolverhampton is one of 25 European cities that cooperate in exchanging information on their integration policies through the CLIP network.

The CLIP project aims to collect and analyse innovative policies and their successful implementation at the local level. It aims to encourage a learning process within the network of cities, addressing the role of the public sector, voluntary and community organisations, social partners and the private sector in supporting successful integration policies; providing assessment of current practice and initiatives; communicating good practices to other cities in Europe; and supporting the further development of a European integration policy by communicating the policy relevant experiences and outputs of the network to European organisations of cities, local and regional authorities, the European and national organisations of social partners, the Council of Europe and the various institutions of the European Union.

The CLIP network is also a cooperation between cities and research institutes. Five research institutes in Bamberg (Germany), Amsterdam (The Netherlands), Vienna (Austria), Liege (Belgium) and Oxford (UK) are involved in the development of the publications of the CLIP project.

The CLIP project explores different dimensions of integration policies in European cities. One dimension - the focus of a first series of publications - concerns housing. This report focuses on the diversity policies of cities in relation to employment and the provision of services.

Researchers at the Centre on Migration, Policy and Society at the University of Oxford have collaborated with staff of Wolverhampton City Council and other relevant partners in the City in developing this report.

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1 The UK: setting the city and its diversity policies in context

1.1 History of migration to the UK

The history of immigration in the United Kingdom dates back beyond the 18th century. In the immediate post-war years, displaced people and refugees from Germany and East Europe settled in the country, followed by significant primary immigration from the UK's former colonies, meeting a demand for labour in the post-war economic boom, followed by migration for family reunion. The UK's colonial past and its persisting links with nations now in the Commonwealth have remained a determining influence on patterns of migration to and settlement in the country, the majority of people with a migration background in the UK coming from countries with a historical and economic link to the UK. Nevertheless, from the early 1990s in particular, refugees, labour migrants and international students from across the world have shifted the pattern of entrants to the UK and of those who have made it their home.

In 2001, at the time of the last full census, the migrant population (non-UK born) accounted for 4.9 million or 8.3% of the population. The increase in non-UK born in the decade 1991–2001 was greater than in any post-war period: almost 1.1 million people migrated to the UK during that period. Amongst the non-UK born, those from Europe ranked first, while the Republic of Ireland was the largest single country of birth (National Statistics Online, 2006).

Not captured in the Census are the East and Central European migrants who came to work in the UK following enlargement of the European Union on 1st May 2004. Over 600,000 have registered to work in the UK, an underestimate of the total arrivals as those who are self-employed are not required to register; however the figure also does not identify those who have subsequently left the UK. Many are working in low wage sectors of the labour market where there were significant vacancies, such as construction, agriculture and hospitality. As a result, the pattern of residence is very different from earlier migrant settlement in Britain's industrial heartlands: many towns and rural areas are experiencing significant numbers of East and Central European migrant workers living in the area for the first time (Home Office WRS data, 2006; Anderson et al, 2006).

In the post-war period, legislation from the 1960s imposed increasing restrictions on immigration for work and family reunion. Since the early 1990s, a succession of Acts of Parliament have restricted access to welfare support for asylum seekers, and provided for the dispersal of those requiring accommodation and support to designated areas across the UK, including Wolverhampton and other parts of the West Midlands region. Skill and labour shortages in sections of the labour market led the Government, from the late 1990s, to allow employers greater access to labour migrants and to a shift, from 2000, to a 'managed migration' policy intended to maximise the economic benefit to the UK from labour migration. Opening up the UK's labour market to the countries which joined the EU in 2004 was part of that strategy to reduce the UK's need for migrant workers from beyond the EU (Spencer, 2007).

1.2 National policy context

The equalities legislative framework in the UK is one of the principal strands of national policy on diversity in employment and service provision, covering equality with respect to gender, race, disability, age, sexual orientation and religion or belief. Diversity

concerns are therefore not targeted at migrants specifically. One dimension of this legislative framework (discussed further below) - race equality legislation - was originally developed in the context of migration from Commonwealth countries, but is directed towards equality and diversity concerns with respect to ethnicity as opposed to migration status.

Other national policy agendas that also incorporate diversity concerns include the Community Cohesion agenda and the Neighbourhood Renewal Strategy. The latter is targeted at the most deprived neighbourhoods in the country, including urban areas where a high proportion of migrant and ethnic minority groups are resident.

Race equalities legislation

Discrimination against migrants from Commonwealth countries and their descendants led to legislation, from the 1960s, addressing discrimination on grounds of race in employment and in the provision of goods, facilities and services (such as housing and education). It was strengthened by the Race Relations (Amendment) Act 2000 to place a statutory duty on public authorities to promote race equality and good race relations. In 2003, following the EU Employment Directive (Council Directive 2000/78/EC), the UK also legislated to make discrimination on grounds of religion or belief unlawful in employment and training, extended in 2006 to cover discrimination in goods, facilities and services, but without a duty on public bodies to promote equality. The focus of initiatives to address discrimination has been on race and (recently) faith minorities, rather than on new arrivals to the UK. The Commission for Racial Equality, established in 1976 to promote and enforce the Race Relations Act, is to be replaced in 2007 with a Commission on Equality and Human Rights, addressing broader equality, human rights and community relations issues but without a specific focus on migrants.

As noted, the Race Relations (Amendment) Act 2000 places a statutory duty on public authorities, including City Councils and other local authorities, to promote race equality. This includes a general duty, set out in section 71(1) of the Act, to:

- Eliminate unlawful racial discrimination;
- Promote equality of opportunity and good relations between persons of different racial groups.

With regard to this general duty, public authorities are expected to consider the implications for race equality in terms of employment and the diversity of their workforce; and in terms of the provision of services for which they are responsible. In order to meet this general duty, specific duties required include:

Publishing a race equality scheme

A race equality scheme sets out how a public authority will meet the required general and specific duties of the Act. It summarises its approach to race equality and how this links to its corporate aims and objectives. Although these schemes are a more recent development, many local authorities already had equal opportunity and/or diversity strategies in place prior to the legislation. In a race equality scheme a public authority is expected to demonstrate how it will:

- assess and monitor its services to make sure that they are not affecting some groups negatively, and that all communities are satisfied with them;
- deal with evidence that its services are not in line with the general duty;
- publish the results of assessments, consultations and monitoring;
- make sure that everyone, irrespective of ethnic group, has access to information and to the services that it provides.

Public authorities are required not only to publish information about their services, but to ensure that different groups are accessing that information. They are required to investigate differences in access to services between ethnic groups and the barriers inhibiting equal access for some groups (e.g. through consultation with ethnic minority groups and organisations, and with service providers); and to develop measures to address those barriers.

The employment duty

The employment duty requires a public authority to monitor its workforce by ethnic group, including the number of¹:

- staff in post;
- applicants for employment, training and promotion;
- staff who receive training;
- staff who benefit or suffer detriment as a result of its performance assessment procedures;
- staff involved in grievance procedures;
- staff who are the subject of disciplinary procedures;
- staff who cease employment.

Public authorities are required to annually publish this monitoring data on their workforce. In addition, some public authorities may also require independent providers that are contracted to deliver services to keep this data on their employees.

Community Cohesion

An additional dimension to the current policy context in the UK concerns the Government's Community Cohesion agenda, which developed in response to a number of conflicts amongst different minority ethnic communities in English cities and towns during 2001. In the aftermath of 7/7 (the London bombings), public debate on community cohesion has predominantly focused on the UK's Muslim communities. Community cohesion is defined by the Government in terms of the development of policies and programmes at the local level to promote:

- a common vision and sense of belonging for all communities;
- the valuing of diversity;
- similar life opportunities for all;

¹ The latter three monitoring requirements apply to public authorities with 150 or more full-time staff.

- strong and positive relationships between people from different backgrounds and circumstances in the workplace, in the school and within neighbourhoods.

(Department for Communities and Local Government, 2007a)

In 2006 the Government appointed a Commission on Integration and Cohesion, which reported in 2007 on its proposals for the development of cohesion and integration policies, recommending that an agency be set up to manage integration of new migrants (Commission on Integration and Cohesion, 2007).

Neighbourhood Renewal

Diversity policy is also an element of the Government's Neighbourhood Renewal Strategy, first launched in 2001, which aims to tackle inequalities and disadvantage in the most deprived neighbourhoods in England (based on indices of deprivation). Area-based Neighbourhood Renewal plans are developed and implemented at the local level through *Local Strategic Partnerships*, bringing together the local authority and other local agencies from across the public, private, voluntary and community sectors. These plans are expected to take into account diversity issues, although the diversity of local communities in this context is considered not simply in terms of ethnicity or migrant background, but across different communities of identity, also including faith communities, gender, disability, older people etc. A key focus is on the engagement of local communities in the development and implementation of Neighbourhood Renewal initiatives (Department for Communities and Local Government, 2007b).

2 The city

2.1 The City of Wolverhampton: location and history²

Historically a part of Staffordshire, Wolverhampton became part of the West Midlands Metropolitan County in 1974 and on the dissolution of the county in 1986 became a Metropolitan Borough. The current population of Wolverhampton stands at 236,900 (Office for National Statistics 2006 mid-year estimate).

Wolverhampton alongside Dudley, Sandwell and Walsall make up the Black Country in England. This is the industrial area situated to the west of Birmingham. Its name derives from 19th century descriptions of the industrial landscape, dominated by smoking chimneystacks. The boundaries of the area are not clearly defined, but it is traditionally argued that the Black Country lies across those points where the region's 'thick coal' steam comes to the surface.

Wolverhampton is a vibrant, multi-cultural city with a documented history that stretches back to 985AD when King Aethelred granted the title of land known as Heantune to Lady Wulfruna. The City is the seat of the University of Wolverhampton (1992, formerly a

² The data referred to in this section was provided by the Policy Team, Wolverhampton City Council.

polytechnic college) and a 16th century grammar school. Wolverhampton grew around the Church of Saint Peter, established in 994. In 1258 the town was granted a Wednesday market, which is still held, and an annual fair.

During the 14th and 15th centuries, Wolverhampton was a centre of the woollen trade. Wolverhampton grew rapidly during the industrial revolution, based on expanding coal, steel and manufacturing industries.

The majority of employment has historically been in manufacturing, but recently service sector jobs have increased significantly. During the past 40 years, Wolverhampton's manufacturing base has declined dramatically and much of the City's heavy industry has disappeared. One sector which has expanded in recent years is banking and financial services. A quarter of Wolverhampton's residents work in the public sector.

2.2 City's migrant population, its history and characteristics

Wolverhampton's ethnic minority and migrant populations³

As a result of economic growth, Wolverhampton has experienced successive waves of migration, first from Ireland and Wales in the latter half of the 19th century, then from the Indian sub-continent and Caribbean in the second half of the 20th century.

In 1991, black and minority ethnic groups in the City made up 18.6% of the population (including ethnic minority residents born in the UK and those born outside the UK). According to the 2001 Census, this has increased to 22.2%, which is a higher proportion of the local population than for the West Midlands region (20%) and considerably higher than for the UK population as a whole (8.3%).

The ethnicity of the population of Wolverhampton, based on the ethnic categories in the 2001 Census, comprises: White, 184,044 residents (77.8%); Mixed (ethnicity), 6,441 residents (2.7%); Asian/Asian British, 33,870 residents (14.3%); Black/Black British, 10,874 residents (4.6%); and Chinese/Other, 1,353 residents (0.6%). The Indian population (12.3%) makes up the largest minority ethnic group in the City.

With regard to migrants (non UK-born) exclusively, the population of Wolverhampton includes 3,574 residents (1.5% of the total population) born elsewhere in the EU (including Ireland), and 23,021 residents born outside the EU (9.7% of the total population). Its local population has the second highest proportion of non-UK born residents of the 34 local authorities in the West Midlands region (2001 Census).

According to data from the UK Border and Immigration Agency (2006-2007), there are some 900 asylum seekers resident in Wolverhampton, typically representing some 49 nationalities; the largest groups being from Iran, Iraq, Pakistan, Somalia and Afghanistan. Data on the asylum seeker and refugee population of Wolverhampton cannot be drawn from the 2001 Census, which does not record immigration status.

³ The data provided in this section was compiled by the Policy Team, Wolverhampton City Council.

Additionally, over the period 2004 to 2007 there has been the arrival of migrant workers from the new EU member states to the UK (Border and Immigration Agency et al., 2007), including arrivals to Wolverhampton (who live in Wolverhampton but tend to work in surrounding areas in agricultural/factory work). There is, however, a lack of data on departures.

Religion

Wolverhampton is a diverse city in terms of religion, comprising residents who are Christian (157,300); Buddhist (737, the highest proportion in the West Midlands region); Hindu (9,198, highest proportion in the West Midlands region); Jewish (104); Muslim (4,060); and Sikh residents (17,944, highest proportion in the West Midlands region and the fourth highest proportion of local authority populations in England and Wales) (2001 Census).

Age and population trends

Amongst the City's ethnic minority groups different age patterns exist (according to the 2001 Census), with larger proportions of younger people amongst the minority ethnic population compared with the White population.

2.7% of the Wolverhampton population are of mixed ethnic origin, but when looking at under 15s this equates to 8% of the population (birth data indicate that this group is expanding and is expected to continue to do so).

National Statistics Population Projections predict the following trends. First, there is expected to be an increase in the black and minority ethnic population, both in absolute numbers and as a proportion of the population. A research report on black and minority ethnic housing in the City, commissioned by Wolverhampton City Council, emphasised that while the percentage of the White population has decreased by 2.5%, other populations, such as the Asian and Black populations have increased by almost 2% (according to the 2001 Census and the 2004 Annual Population Survey) (MEL Research and Service Development, 2006). Second, there is expected to be a significant increase in the number of over 85s, caused by increasing life expectancy, and, in particular, a significant increase in the number of black and minority ethnic older people over the next 30 years.

Household data

Wolverhampton's black and minority ethnic households tend to be larger on average than those of the White population. Approaching one in four black and minority ethnic households (23.6%) have at least five household members and 9.9% have at least six. This is particularly so for Asian households: 43.4% of Pakistani households have five or more members and 20.3% have six or more; 25.7% of Indian households have six or more members (MEL Research and Service Development, 2006).

As noted above, minority ethnic households tend to comprise more younger members: 61.4% of those living in households of Mixed origin are under 16 years of age, and for Asian households the proportion of under 16 year olds ranges from 23.9% for Indian households to 33.6% for Pakistani households. Black and minority ethnic groups are also more likely to have members in the 16 to 24 year age group, which is the group more likely to be forming

new households (MEL Research and Service Development, 2006).

Lone parent households tend to be more prevalent amongst African, Caribbean and households of Mixed origin: 30% of the population from a Mixed background live in a lone parent household. Lone parenthood, despite concerted targeting of welfare resources in recent years, is still associated with poverty and disadvantage (MEL Research and Service Development, 2006).

People from black and minority ethnic backgrounds, especially those of Bangladeshi, Pakistani or African origin, are far more likely to live in low income households than White people (MEL Research and Service Development, 2006).

Employment and unemployment

The current unemployment rate in Wolverhampton stands at 5% (August, 2007). In comparison with other authorities in the West Midlands area, the rate for Wolverhampton is the second highest (at this date), with the highest being Birmingham at 5.5% and the lowest being Solihull at 2.1%. The unemployment rate in Wolverhampton is over double the national average (2.3%) (Office for National Statistics).

Unemployment rates for black and minority ethnic groups tend to be higher than the rate for the White population in Wolverhampton (5%) and the overall rate (5%) (2001 Census). For those of Mixed origin, the unemployment rate stood at 13% at the time of the 2001 Census. The rate was 9% for the Black population and 6.6% for the Asian population.

Of the Wolverhampton population employed in Managerial/Professional and Technical occupations, the White and Asian populations contribute the largest proportions. Just under a third of both the White and the Asian working population (31%) are employed in these areas. By contrast, only 14% of the Black working population is employed in these occupations (2001 Census).

Just under a quarter of the Wolverhampton Asian population is employed as Plant and Machine operatives. This figure is much higher than that of any other ethnic group (12.9% of the White population and 11.3% of the Mixed population are employed in this occupation) (2001 Census).

2.3 The city authority: tier of government, responsibilities, structure

Wolverhampton City Council is a Metropolitan Borough within the single-tier local government structure in England⁴. It is one of seven Metropolitan Authorities in the West Midlands area.

Local authorities in England raise their income in a number of different ways. This includes a local council tax (around 25% of total revenue); central government grants (around 48% of

⁴ In parts of England a single tier, all purpose council is responsible for all local authority functions. Other parts of England have a two-tier system, in which two separate councils divide responsibilities between district and county councils (Local Government Association, 2007).

revenue); a charge to businesses, which is set by central government (around 25% of revenue); and the remainder being made up of charges for services and reserves (Local Government Association, 2007).

As a Metropolitan Borough, Wolverhampton City Council has responsibility for: education; housing; planning applications; strategic planning; transport planning; highways; social services; libraries; leisure and recreation; waste collection; environmental health; and revenue collection.

Wolverhampton City Council's Executive is responsible for decision-making in line with the Council's policies and budget. If a decision is outside of the Council's policy framework and budget, this must be referred to the full Council meeting. Membership of the Executive consists of the Leader of the Council and nine cabinet members (the Labour Party has a majority of elected members within the Council).

3 The city's approach to diversity

3.1 Historical background: reasons for the development of the city's approach, influence of national policy and of the media

Wolverhampton City Council has a long-standing commitment to diversity policies, reflected in overall Council strategies. Three dimensions to the City's diversity policy can be identified, which broadly relate to the national policy context on equalities, community cohesion and neighbourhood renewal.

The Council's approach to diversity has been strongly influenced by the history of equalities legislation in the UK. As discussed in section 1.2, this legislation includes equal opportunities and anti-discrimination in employment with respect to race/ethnicity, gender and disability and other more recent equalities dimensions. The Council's equal opportunities policy was first adopted in 1986. It has since been amended several times to ensure new statutory duties are included. Since the 1980s, various committees have been established on equalities issues, involving elected members of the Council. Its equal opportunities policy covers equality on grounds of race as well as other dimensions, including gender, disability, nationality, ethnic or national origin, age, religion/belief, and sexual orientation.

In response to the requirements of the Race Relations (Amendment) Act 2000, the Council produced its first Equality Scheme in 2002. The Scheme sets out the Council's approach to meeting its legal obligations and wider commitment to developing employment opportunities and services that reflect the diversity of the population of Wolverhampton. At the time, Wolverhampton was one of the first Council's to extend its Scheme to cover not only race, but also gender and disability.

Within this context, promoting diversity in employment is related to the aims of challenging inequality, discrimination and disadvantage amongst the City's population. Diversity policy in employment is therefore conceived as contributing to a more fundamental aim of tackling inequalities between groups (according to ethnicity and other socio-economic characteristics). Likewise, the Council's approach to diversity in service provision is framed in terms of challenging inequality and disadvantage: by promoting equality of access to services

amongst different groups; providing services that address their needs; and improving outcomes for disadvantaged groups.

Another dimension to the Council's approach concerns celebrating the cultural diversity of Wolverhampton and promoting tolerance and respect between different groups, both through its employment practices and service provision (Wolverhampton City Council, 2007). This in part relates to the national Community Cohesion agenda, where diversity policy includes the objective of promoting relations between different ethnic and faith groups. Linked to this agenda, the City Council has established a *Community Cohesion Forum*, including representatives of the Council, the Police, the City College, local faith leaders, and the Wolverhampton Asylum and Refugee Service, which aims to develop a joint approach to promoting relations between local communities, including both established minority ethnic groups and migrants. However, Wolverhampton does not appear to have experienced many open incidents of conflict between different ethnic groups, or between newly arrived migrant groups and more established residents.

In addition to the influence of the Community Cohesion agenda, the City's diversity policies have been influenced by the national Neighbourhood Renewal Strategy. The City's Local Strategic Partnership, the *Wolverhampton Partnership*, which involves the Council and a number of other local public, private and voluntary sector organisations, was responsible for developing the Community Plan for the City. The vision for Wolverhampton, set out in the Community Plan, is for it to be a culturally diverse and sustainable city (Wolverhampton Partnership, 2002). Developing a 'City of Communities and Neighbourhoods' forms one of the priorities of the plan, defined as a city where "*we will respect and celebrate racial, cultural and religious differences and live harmoniously together*". The implementation of neighbourhood renewal initiatives in targeted neighbourhoods within the City is referred to in terms of bringing together all groups, organisations and local communities to improve services (see section 3.2 of this report for further details), reflecting the overall aims of the Government's Neighbourhood Renewal Strategy for tackling deprivation through greater engagement of local communities in the planning of local services.

The local media has not traditionally been very supportive of Wolverhampton City Council. There has not, however, been any particularly negative comment on the Council's approach to diversity in employment or service provision. The City Council has its own partnership paper, *One City News*, which helps to promote positive messages and communicate with service users and local residents.

3.2 Objectives of the policy/approach; to which categories of the city's population it applies and to which sectors of employment, services and external agencies

The Council's equalities policy

Wolverhampton City Council's approach to diversity in employment and service provision relates to its Equality Scheme. Specific aims of Wolverhampton City Council's equalities policy include to:

- Recognise the varied needs, expectations and culture of local people and reflect these differences in the range, sensitivity and relevance of its services.
- Promote tolerance and respect between diverse groups in the City.

- Acknowledge and celebrate, wherever possible, the wide variety of lifestyles and cultures in the City.
- Act promptly on any complaints about its employment practices and service delivery.
- Consult community groups, agencies and its workforce to ensure that service delivery, policy and practice are appropriate and effective.
- Recognise that a representative workforce provides greater sensitivity to and understanding of community needs.

(Wolverhampton City Council, 2007)

These objectives are integrated across the wider strategies and plans of the Council and those of particular service groups.

Wolverhampton City Council's Corporate Plan

Wolverhampton City Council's Corporate Plan 2005-2008 sets out its strategic priorities. These priorities include 'making communities safer and stronger' so that "*diversity is valued and celebrated, with good community relations, and where local people, including newcomers, feel a sense of 'belonging'*" (Wolverhampton City Council, 2005a: 22).

Related to this objective is the implementation of the neighbourhood renewal strategy and action plan for Wolverhampton, involving the development of neighbourhood management pilots in seven of the most deprived local neighbourhoods within the City. The neighbourhood management pilots aim to improve the delivery of local services, including access and outcomes for black and minority ethnic groups.

Wolverhampton Community Plan

With regard to the Wolverhampton Community Plan and its priority for a 'City of Communities and Neighbourhoods', specific objectives also include increasing the participation of ethnic minority communities in decision-making on local services. This objective has been supported by the development of a *Black and Minority Ethnic Network*, which brings together black and minority ethnic representatives from across the City to identify issues and concerns from ethnic minority communities and to ensure black and ethnic minority representation in city-wide decision-making structures that have direct influence on service providers. The group is one of a number of networks set up to give so-called 'hard to reach' communities a voice in key decision-making. It was directly involved in the development of the recent Black and Minority Ethnic Housing Strategy (see sec. 5.2).

Target groups and sectors

The Council identifies its employees and service users according to ethnicity, in line with the national race equality legislation described in section 1.2. Its policies apply to all sectors of the Council's workforce and to all services for which it is responsible. Where the Council contracts out services, the contractor is required to adhere to equality regulations. These regulations include monitoring and providing data on employees according to ethnicity (see section 5.2 below for further details on the application of equality standards in the contracting of services).

Other agencies in receipt of funding through the Council (e.g. voluntary organisations) are also required to demonstrate the adoption of equality policies and principles in the way they operate. However, there is some variance in the level of data provided, partly depending on the size of the organisation and the services that are delivered.

3.3 Responsibility: elected representatives and officials

Ultimate responsibility for the achievement of diversity objectives lies with the Council's Executive, which provides strategic direction.

In 2002, a Member Equality Group was set up, involving elected members of Wolverhampton City Council. A Member Champion was appointed to oversee the development of the first Equality Scheme and its implementation. This work is currently being continued by a new *Equalities Project Board*, chaired by the Leader of the Council, which is responsible for monitoring progress and developing best practice through consultation with community groups and other organisations. The *Equalities Project Board* includes a Member Champion for race and ethnicity (as well as a Member Champion for gender and for disability). This leadership and the political profile it gives to the development of equality policies and strategies are considered crucial to success.

There is an Equalities team of officers within the Council, which is responsible for related research and the development of equalities strategies, and for facilitating their implementation in employment and across services.

Employment

Regarding employment policy and practice, the Council's corporate Human Resources division has for many years embedded equalities into its policies and processes. A strategic lead is taken by the Chief Human Resources Officer.

Service provision

Overall lead responsibility for the implementation of diversity objectives in service provision lies with the Council's directors and service managers. A cross-council *Equality Steering Group*, chaired by one of the Council's directors, brings together officers from each service group/department to steer the implementation of equality and diversity policies. Each service group has a senior officer responsible for coordinating work on equality issues.

3.4 Collaboration with social partners and non governmental organisations in policy development and implementation

Through the *Wolverhampton Partnership*, the Local Strategic Partnership for the City, the Council collaborates with other local public, voluntary and private sector agencies. The Partnership is responsible for the development of a Local Area Agreement for the City, which is intended to enable a joint approach to service planning and delivery across relevant agencies. Objectives for reducing inequalities between communities and promoting diversity in terms of the planning and delivery of services are integrated within the Local Area Agreement.

In the development of its equality policy the Council consulted trade unions, the voluntary

and community sector, and the University of Wolverhampton, as well as Council staff and managers across service groups.

More generally, the Council has a close working relationship with the Wolverhampton Voluntary Sector Council and specific organisations working with different minority ethnic and migrant communities. Wolverhampton Asylum Seeker and Refugee Services (WARS) and other black and minority ethnic organisations were directly involved in the development of the Wolverhampton Interpretation and Translation project (discussed further in section 5.4) and are consulted on a range of diversity-related issues. The Council has worked directly with WARS in the development and implementation of advice and guidance services for migrant groups to facilitate access to housing and other services (see section 5.8 for further details).

Following two public consultation conferences in 2004 and 2005, a new *Race Equality Partnership* was established in Wolverhampton (in October 2005). The Race Equality Partnership aims to play a central role in the future in supporting public and private organisations, strategic partnerships, and voluntary and community organisations within the City to implement the Race Relations (Amendment) Act 2000.

3.5 Policy and practice on monitoring progress

As referred to previously, public authorities have a statutory duty to monitor employment and to assess the impact of their policies according to race and other areas of equality covered by the legislation. Monitoring by local authorities is externally regulated by the Audit Commission (which is responsible for the auditing and inspection of public authorities and services in England). Local authority monitoring systems are required to capture data on the ethnicity of employees/service users, based on the ethnicity categories adopted in the 2001 Census, but not on country of birth or immigration status.

Wolverhampton City Council has been monitoring progress with regard to the diversity of its workforce since the early 1990s. Employment data is currently provided according to race, gender and disability (and age where the data is available). With regard to race, data is provided on the following ethnic categories: 'White'; 'Mixed' (parental ethnicity); 'Asian or Asian British'; 'Black or Black British'; 'Chinese or Other ethnic group'. The data is published annually by the Council in its Equality Monitoring Report (see Wolverhampton City Council, 2006). The monitoring of progress in service provision (access and outcomes) is carried out by the Council's service groups, although the extent to which this information is produced by each service group is variable (see section 5.5).

3.6 Key challenges faced in implementation and broad lessons learnt

There is at times a lack of understanding generally about how the equality/diversity agenda relates to city-wide achievement and the well-being of *all* the City's local communities. Avoiding the agenda being seen as 'separate' or only relevant to certain people/communities is an ongoing challenge. It is considered essential to work at a strategic and city-wide level and to build in clear links with the Community Cohesion agenda in order to promote diversity as an objective that is integral to all policies and to the City's population as a whole.

3.7 Potential future policy development

The Council's Equality Scheme currently addresses equality and diversity objectives for race, gender and disability together, as it is considered necessary to make links between all three dimensions. However, from 2008 there will be separate sections and action plans for each area.

4 Employment: policy, practice and outcomes

4.1 Profile of city employees

Wolverhampton City Council publishes annual monitoring data on its workforce according to ethnicity, gender and disability.

For the period 2005-2006, the Council employed a total of 14,916 members of staff, of which 14% were employees from ethnic minority groups (Mixed; Asian or Asian British; Black or Black British; Chinese or Other ethnic group). A breakdown of the ethnicity of employees is presented in Table 1 below.

Table 1 Wolverhampton City Council staff in post by ethnicity*

Ethnicity	White	Mixed	Asian or Asian British	Black or Black British	Chinese or other Ethnic Group	Not Known	Total
Percentage	71.15%	0.85%	7.68%	5.12%	0.35%	14.85%	100%
Total	10 612	127	1 145	764	53	2 215	14 916

* Including casual staff. Data obtained through the Council's payroll system.

Source: Wolverhampton City Council, 2006: 2-3

Wolverhampton is in the top 25% of all councils in England regarding the percentage of ethnic minority staff in senior grades (based on the Audit Commission's comparison of local authority Best Value Performance Indicators). For the period 2005-2006, ethnic minority employees made up 7.2% (23 employees) of the top 5% of full-time employee earners⁵ (Equality Monitoring Report 2005-2006).

Regarding applicants for employment, ethnic minority applicants made up 30.35% (4,344) of the total number of job applicants (14,312) for the 2005-2006 period (Wolverhampton City Council, 2006).

Further data on the Council's workforce, which it has a statutory duty to publish, are presented in its Equality Monitoring Report (Wolverhampton City Council, 2006).

⁵ Based on pay scale figures.

4.2 Employment diversity policy, including target sections of the population to which it is directed and occupations covered

Objectives

The Council's employment diversity policy aims to promote equality of access to employment opportunities for all sections of the local population. This commitment is underlined in the Council's human resource policy, outlined in its People and Learning Strategy 2005-2008 (Wolverhampton City Council, 2005b). 'Valuing diversity' is one of the four key themes of this strategy, with a view to ensuring "*that our workforce is representative of the community we serve and that no groups of employees or prospective employees will be disadvantaged by our employment policies and practices*" (Wolverhampton City Council, 2005b: 10).

This includes a commitment to:

- Ensuring that managers understand the principles of diversity and have the skills to apply them.
- Listening to and acting on barriers to employment and promotion.
- Encouraging our diverse community to join the Council by open and fair employment policies and practices.

Specific objectives and actions to be undertaken by the Council include: Increasing opportunities for local people to gain entry to employment with the Council, with a specific focus on disadvantaged groups.

- The Council aims to increase work experience and placement opportunities in the future to achieve this end.
Achieving a more representative workforce.
- Measures to achieve this aim include the use of targeted recruitment campaigns and senior level development programmes for minority ethnic staff.
- Reviewing the need for positive action development programmes.
A survey of minority ethnic employees will be carried out to help assess this need.

(Wolverhampton City Council, 2005b)

Target groups

The Council's policy applies to the local population as a whole in line with equalities legislation on race and other equalities dimensions. In order to meet its statutory duty to promote race equality, specific groups may be targeted by Council policies and practice.

The targeting of black and minority ethnic groups has included consultations with those groups considered to be under-represented amongst the Council's workforce. In 2003, for example, consultation workshops were held with members of the Asian community on the Council's job advertising and recruitment practices, the results of which fed into the equality and employment action plans for 2004-2005 (see below). Black and minority ethnic staff consultation workshops were also held in 2005. In Social Services, there is a Black Workers' Development Group that has been consulted in the development of staff recruitment and

retention strategies. In addition, a staff survey is carried out across the Council every two years in order to obtain staff feedback on a range of issues, and a staff panel is in place to obtain feedback from different groups of employees.

All migrants who are legally entitled to work in the UK are eligible to work for the Council (which has a legal requirement to check that its employees are entitled to work). However, as data systems do not identify employees by their immigration status (e.g. Indefinite Leave to Remain, EU nationals) or country of birth, it is not possible to accurately identify employees on this basis.

Occupations

All occupations are covered by the Council's policy. As part of monitoring progress on the diversity of its workforce, the number of ethnic minority employees in more senior grades is monitored, with a view to ensuring equal opportunities and diversity at a senior level. The Council does not use quotas for migrants, ethnic minority groups, or any other group in its recruitment practice. However, as referred to above, a review of the need for positive action development programmes is being carried out, regarding the career development of minority ethnic employees within the Council.

4.3 Challenges and tensions in development and implementation of policy

Challenges experienced by the Council in policy implementation have included the perceptions of some minority ethnic groups of the Council as an employer. While Council policy has emphasised a commitment to the recruitment of minority ethnic staff, the Council has not necessarily been considered by minority ethnic groups to be a preferred employer.

In 2002 there was representation by the Asian Sikh community for more targeted community action in the Council's recruitment policy. As a result, the Council organised focus groups of young Asian people in 2003 to discuss recruitment (as referred to above). A number of the participants informed the Council that it was rather 'remote'. Some also indicated that the Council/public sector was not their employer of choice (compared with the private sector). The results of the consultation were incorporated into the Council's recruitment action plan for the following year. Actions taken to address this tension between policy aims and the perceptions of targeted ethnic minority groups are outlined below.

4.4 Recruitment, training and promotion

Recruitment

Achieving a workforce that is more representative of Wolverhampton's ethnically diverse population is a key objective of the Council's recruitment policy. Race discrimination in recruitment procedures is unlawful under the Race Relations (Amendment) Act 2000 and as a public authority the Council has a statutory duty to monitor the ethnicity of applicants for employment.

The Council does not target migrants for recruitment to particular posts. However, it has adopted recruitment measures targeted to particular ethnic minority groups as a means of encouraging applicants from those groups. These have tended to be more established groups, including the local Asian Sikh population, as opposed to newly arrived migrants, such as East

and Central European EU Nationals or refugees. Recruitment measures used include targeted advertisements and recruitment fairs. In order to promote the Council as a local employer to particular groups, outreach activities have additionally been initiated, including going to local Sikh temples and other community venues. In the past, a number of positive action measures were implemented, but are not used at present.

Regarding the relative success of the Council's approach, ethnic minority applicants for employment comprised just over 30% of all job applicants for the 2005-2006 period⁶. Just over 18% of all job applicants were specifically Asian or Asian British applicants⁷ (Wolverhampton City Council, 2006). Monitoring data also show a slow but steady increase in the percentage of ethnic minority employees (see section 4.13). This success is considered to be not necessarily the result of a particular initiative but a consistent commitment to equality and diversity by the Council; and the development of trust amongst ethnic minority communities that the Council is sincere in its commitment.

Training

Diversity objectives in the context of training focus on: (1) access to training to promote the career development of ethnic minority employees; and (2) the provision of training on diversity for all employees.

Training for career development

Training issues are identified as part of the Council's Employee Related Performance Scheme, in which all employees participate. All staff are encouraged to go on internal or external training courses related to their job/career development. Participation in training is monitored by Chief Officers of the Council and feeds into the Learning and Development Programme. Access to training is monitored according to the number of ethnic minority employees applying for training and the number who receive training.

Ethnic minority staff are well-represented on many of the Council's internal training courses. For the period 2005-2006, just over 19% of staff who received training were ethnic minority employees (Wolverhampton City Council, 2006: 8).

A Black Workers Development Group⁸ has helped inform and develop a Recruitment and Retention Strategy for the Council's Adults and Community services group.

In addition, a positive action development programme for black and minority ethnic staff has recently been developed to enable staff to progress to managerial positions. This was launched on the back of the Pursuing Equality and Excellence Project Report, which investigated why black and minority ethnic staff in Wolverhampton City Council appeared to

⁶ A total of 14,312 applications for employment within the Council were made in this period, of which 4,344 were ethnic minority applicants.

⁷ 2,597 applicants.

⁸ The Black Workers Development Group was established as a self-help group to assist the career development of black and minority ethnic staff of Wolverhampton City Council.

remain in lower graded posts, and to identify any barriers to learning and development at different grades (Wolverhampton Social Services Black Workers Group, 2006). As it is a newly created programme, there are currently 12 places for black and minority ethnic staff. The programme combines internal as well as bespoke training delivered by specialist external consultants, covering personal effectiveness, management and leadership training, with work placement and an allocated mentor for each participant.

Training on diversity

Training on equality and diversity is provided for all staff. All employees as part of induction training participate in an Equality Essentials induction course, which includes basic awareness raising on equality and diversity issues.

All new social care workers are required to complete the Skills for Care Common Induction Standards that includes equality and diversity training.

In addition, there is a programme of specific equality courses for staff, and new awareness raising courses are developed in response to specific requirements and legislative changes. Diversity issues are also embedded into core training programmes such as Recruitment and Selection.

An officer has been appointed to the corporate training section to ensure the Council has an equality training strategy for all levels of staff. Briefings on the equalities agenda have been held with senior management teams; and Council Directors have attended a workshop on national requirements and best practice. A series of lunch-time ‘*One City Many People*’ workshops were held to increase understanding about the diverse religions within Wolverhampton.

Promotion

Race discrimination in the promotion of staff is unlawful under the Race Relations (Amendment) Act 2000. As a public authority, the Council has a statutory duty to monitor the ethnicity of applicants for promotion. The Council uses monitoring of internal job applicants as a proxy for promotion.

Decision-making on promotions is carried out by Recruitment Panels, which wherever possible should be representative in terms of ethnicity and gender. Recruitment and Selection Training for managers covers issues on equality and diversity, as referred to above.

Ethnic minority employees are represented in senior positions within the Council’s workforce. As noted previously, only the ethnicity and not the country of birth or immigration status of employees is recorded. Monitoring data show that the Council has above average representation of black and minority ethnic employees amongst the top 5% of earners in its workforce (see section 4.1).

4.5 Equal pay and working conditions

The Council's Equality Scheme and action plan aims to ensure that all employees of the Council are treated fairly and are paid the appropriate rate for the job that they undertake. Again, the Council has a statutory duty to ensure equal pay and conditions for all employees as part of its duty to promote race equality.

By 2008, the Council will have introduced a new 'Single Status' pay structure to ensure 'equal pay for work of equal value'. One of the primary objectives of the Single Status agenda is to address pay inequality between comparable job types, with a particular focus on gender. Given that black and minority ethnic groups (mainly women) are over-represented in lower paid occupations, there is expected to be an impact on equal pay in terms of ethnicity.

4.6 Harassment

Wolverhampton City Council has a harassment policy, as part of its disciplinary procedure, and encourages employees to report such incidents informally or formally via its grievance procedure. The Disciplinary, Grievance and Capability procedures are monitored according to the ethnicity of staff as part of the Council's equality monitoring framework.

4.7 Accommodation of cultural and religious needs

The Council's policy aims to ensure that particular cultural and religious needs of its employees are accommodated. Provision for religious observance (both daily and through pilgrimage) is made through leave arrangements. Guidance is provided on making prayer facilities available and in 2004 a multi-faith prayer facility was introduced by the Council. Dress code and other policies also accommodate religious or cultural need. The Council is currently working on a joint initiative with the Advisory, Conciliation and Arbitration Service (ACAS, which operates across England, Scotland and Wales) to develop a framework and toolkit for employers on 'Dress and Diversity'.

4.8 Health and safety

Steps have been taken by the Council to ensure that employees with limited English language proficiency are informed about health and safety conditions in the workplace. For example, catering and cleaning staff, many of whom speak and/or read languages other than English, have been provided with information about Health and Safety procedures in their preferred language(s).

4.9 Induction and language tuition

The Council does not have a specific corporate programme of information, advice or training targeted at employees who have recently arrived in Wolverhampton/the UK. English language tuition is not provided directly by the Council but courses are provided through the Wolverhampton City College.

4.10 Recognition of qualifications

The recognition of qualifications obtained abroad has been an issue that Wolverhampton City Council has had to address with regard to some prospective employees with a migration background.

Prospective employees may request acceptance of an equivalent qualification via the application and short listing process. Providing the Council is able to verify that request, it is able to proceed with recruitment. Verification support is available through the national employers' organisation for local government and through specific professional bodies.

The Council's Asylum Seeker Team has received applications from refugees for particular job vacancies who have non-UK based qualifications. Recognition of those qualifications is, however, considered to be only one barrier to the recruitment of refugee candidates. English language barriers are also evident. Another main barrier concerns difficulties in completing application forms, and the lack of understanding of the Council's recruitment system and how to 'get through' that system. There may, therefore, be a need for training and assistance with the application/recruitment process amongst particular migrant groups in order to facilitate access to work opportunities within the Council.

4.11 Complaints

The Council's grievance and disciplinary procedures and the complaints and compliments procedure all cover non-discrimination. There is no differentiation between discrimination on the grounds of race/ethnicity or on other grounds in terms of the application of the procedures; all types of unlawful discrimination and/or harassment are potential disciplinary issues. Human Resources managers are well-experienced in dealing with discrimination and harassment issues.

The Council has a statutory duty to monitor the number of staff who are involved in grievance or disciplinary procedures according to their ethnicity, as well as the number who are the subject of grievance procedures, but current difficulties coordinating IT systems and data input make some of the data unreliable (although steps are being taken to address this).

The Council is currently reviewing both sets of procedures to ensure that they are effective.

4.12 Special initiatives

As referred to previously, the Council has made use of targeted advertisements and recruitment fairs as a means of expanding recruitment from particular groups, including the Asian Sikh community.

The use of targeted employee groups, including the Black Workers Development Group in Social Care Services, has helped inform and develop appropriate policies and initiatives, including the Social Care Recruitment and Retention Strategy.

4.13 Monitoring

Employment monitoring, particularly in terms of workforce representation, has been well established in the Council for many years. The Council monitors applicants for jobs and its existing workforce by race, gender and disability.

As referred to previously, the Council has a statutory duty to monitor the impact of its employment policies by ethnic group (see section 1.2 regarding the employment duty and monitoring requirements).

Monitoring systems capture data on ethnicity but not on country of origin/birth or immigration status of employees/job applicants. Based on the ethnicity categories in the Census, the categories group together 'Black and Black British' employees and therefore it is not possible to identify whether this category exclusively comprises more established ethnic minority groups (e.g. Afro-Caribbean) or includes more recent migrant groups (e.g. refugees). This is similarly the case for 'White' employees, which may or may not include white migrants e.g. East and Central European EU Nationals. Indeed, other migrant groups may be subsumed under the category of 'Chinese and Other', and are therefore not identifiable. There has been no consideration given to date by the Council to expanding the data categories beyond those put in place by the 2001 Census.

The outturns of the Council's employment data are monitored annually by the Audit Commission (which is responsible for the auditing and inspection of public services in England) as Best Value Performance Indicators (the performance of local authorities is assessed according to a set of Best Value Performance Indicators).

4.14 Impact of policy and lessons learnt

Wolverhampton City Council has recently been awarded the national Local Government Equality Standard Level 3, following an external peer assessment to confirm that it is meeting nationally agreed criteria on equalities in relation to employment and service delivery⁹. The Council has scheduled internal Equality Impact Assessments for key employment policies and developments.

According to the Council's monitoring data, there has been a steady increase in the number of ethnic minority employees within the Council: in 2002 12% of its employees were from ethnic minority groups compared with 14% for the 2005-2006 period. Wolverhampton is in the top 25% of all councils in England regarding the percentage of ethnic minority staff in senior grades (Audit Commission Performance Indicators for 2006/07).

Lessons learnt include the importance of actions targeted at particular groups/communities, both in terms of the Council actively promoting itself as an employer as well as promoting particular job vacancies. Making greater efforts to 'go out' to communities through outreach activities in places of worship are considered to be particularly important, rather than simply

⁹ The Equality Standard for Local Government was launched in 2001 and revised in 2006. It is a tool to enable local authorities to mainstream race, gender, disability, age, religion or belief and sexual orientation equalities into council policy and practice. The Equality Standard framework comprises Levels 1 to 5, with external assessment of a local authority at Level 3 and 5 (Improvement and Development Agency, 2007).

relying on traditional recruitment methods. Similarly, it is necessary to ensure that information on the Council, including advertisements on vacancies, are disseminated through channels appropriate to particular groups. This includes making greater use of non-print media as well as using community newspapers or newsletters (e.g. the local Asian press), as opposed to relying on mainstream local newspapers.

The implementation of E-recruitment initiatives (on-line advertising of Council vacancies via the Council's website and on-line application processes) is considered to have helped to increase the number of black and minority ethnic applicants for Council posts.

5 Diversity in service provision

5.1 Services provided and contracted out

The Council is responsible for a range of different services. Examples of main areas of service provision include:

- Education
- Social Services (which includes an Asylum Seeker Team that is responsible for the provision of housing and support services for asylum seekers and the care of unaccompanied asylum seeking children)
- Housing (managed by an arms-length management organisation, 'Wolverhampton Homes')
- Environment services
- Culture and Leisure

While the Council retains responsibility for strategy and policy on service provision, much of the actual delivery of services (e.g. some social care services and housing) is contracted out to independent providers (from the private and voluntary sectors).

This includes the contracting of voluntary organisations to provide some specialist services for ethnic minority groups and for migrant groups (see section 5.8 below for details).

5.2 Diversity policy in services

The Council's Equality Scheme sets out its diversity objectives in service provision (Wolverhampton City Council, 2004). These objectives link with the overall Corporate Plan for the Council and with individual service strategies (for example, the Council's housing strategy). Similarly, the Community Plan (developed by the Council and other local partners involved in service provision through the Wolverhampton Partnership) incorporates equality and diversity objectives in services. In line with race equality legislation and the specific duty to develop a Race Equality Scheme, the Council's policy applies to all sections of the population and to all services for which it is responsible (see section 2.3).

In addition to the Council, other public authorities involved in local service provision are also required to adhere to race equality legislation. With regard to education, individual schools

are required to develop a race equality policy and to assess the impact of their policies on pupils, staff and parents from different ethnic groups.

To ensure that it is promoting race equality in the provision of its services (in line with statutory duties referred to in section 1.2), *Equality Impact Assessments* are undertaken by the Council. These assessments involve the identification of the needs of service users/potential users and investigate the potential impact of a proposal on different sections of the community (or the Council's workforce). The results of this process, which are published, should then feed into any final proposals. Where unmet needs or inequalities in access to services or service outcomes are identified, equality improvement targets are set alongside action plans to address them.

Housing

The Council has developed a new Black and Minority Ethnic Housing Action Plan covering the period 2007-2010, based on research and consultations on the housing needs and aspirations of black and minority ethnic communities across Wolverhampton (Wolverhampton City Council, 2007). The plan's objectives include the development of housing options for refugees; carrying out research on the housing needs of new migrant communities; and the development of an information pack for refugees and other newcomers from abroad which will outline housing options in the City.

With regard to the provision of social housing (delivered by an arms-length management organisation, Wolverhampton Homes), an equalities strategy and implementation plan have been drawn up to specifically address improvements within housing management services. Wolverhampton Homes has its own Equality Steering Group.

Specialist provision

In addition to broader diversity aims in the provision of mainstream services, some specialist services have been developed by Wolverhampton City Council that are targeted at migrant groups. These include advice and guidance services delivered by the Wolverhampton Asylum Seeker and Refugee Service (see specialist initiatives below).

Contracted service provision

The Council's policy towards the contracting of services takes into account equality and diversity with regard to: (1) contractors' compliance with race and other equality regulations; (2) the inclusion of equality and diversity considerations in contract specifications and service delivery; and (3) the diversity of contractors.

The West Midlands Forum of Local Authorities (a consortium of six West Midlands Councils¹⁰ of which Wolverhampton is a member), the Employers' Organisation and the Commission for Racial Equality have together produced a Common Standard for Equalities in Public Procurement. Wolverhampton City Council uses the 'West Midlands Common

¹⁰ Birmingham City Council, Coventry City Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council.

Standard' (WMCS) for assessing contractor compliance with race and other equality requirements. The Common Standard is considered to be an innovative pre-qualification tool to ensure service providers (contractors and partners) have and implement an equalities policy in employment and service provision. The six authorities acting collectively as the 'West Midlands Forum' have developed a shared pre-qualification process and the outcomes are stored on a common resource (the WMCS Database). The WMCS makes the pre-qualification process more efficient in that it reduces duplication for local authorities and achieves economies of scale for potential service providers. This is because an approval for equal opportunities in one authority is accepted by the other five councils.

With a view to promoting a diversity of contractors amongst its service providers, Wolverhampton City Council has held workshops to encourage a wider diversity of contractors to compete for service delivery contracts with the Council. The Wolverhampton Asylum Seeker and Refugee Service is one example of a migrant voluntary organisation that is involved in publicly-funded service delivery for the Council.

5.3 Employment profile of service providers

The Council is required to monitor its workforce according to ethnicity. This data, published in its annual Equality Monitoring Report, reflects employees across the Council, including the Council's different service groups/divisions (the data is not disaggregated by service division). However, the actual delivery of many of the Council's services is contracted out to independent providers. The Council's monitoring data does not cover the employees of contracted providers. External providers (such as Wolverhampton Homes) keep their own data on their employees and are expected to demonstrate that they are adhering to equality standards.

5.4 Access to services

Provision of information on services

There is a statutory duty placed on all public authorities to ensure access to information on their services (see section 1.2). In addition to the general provision of public information about its services, Wolverhampton City Council has taken steps to develop an information pack targeted to new migrant groups. The Newcomer pack, currently in development, is aimed at refugees and other newcomers (mainly East and Central European EU nationals), and will include information about the range of city services available, such as health, education and housing.

Interpreting and translation services

The provision of interpreting and translation services is considered to be of central importance to facilitating access to mainstream services in Wolverhampton for ethnic minority and migrant groups who do not use English as a first language. In recent years, this has included the need for interpreting assistance by frontline services staff who are dealing with more East European languages as well as languages spoken by asylum seekers and refugees.

In order to improve access to services in this respect, the Council has led a city-wide

partnership project, the *Wolverhampton Interpretation and Translation Service (WITS)*.

Interpreting and translation services present three main issues for the Council and other service providers in need of these facilities: the cost of these services; their accessibility; and their quality. The WITS project was initiated in 2004 with the objective of developing and co-ordinating - but not delivering - interpreting and translation services to secure cost effective and reliable services for all service providers/users.

In the early stages of the project, a task group was set up. In addition to the Council, this involved a range of other relevant agencies, including the Wolverhampton Primary Care Trust (responsible for the provision of health services), City of Wolverhampton College and Wolverhampton University, and the local Voluntary Sector Council. An audit of existing interpreting services in Wolverhampton was carried out, following which the Council put out to tender the delivery of face-to-face interpreting and translation services, and also the delivery of a telephone interpreting service. Access to a full range of languages is now available.

The project has been successful in allowing for a joint approach to be taken to address the needs for interpreting and translation services by service providers across Wolverhampton. One difficulty that has emerged concerns the lack of funding specifically for interpreting services in the budgets of some Council service groups and external service providers. Therefore, while there may be a need amongst service groups/providers for the services of WITS, there may not necessarily be the funding in place to access these services for users, raising issues concerning the potential need for ring-fenced funding for interpreting and translation services.

5.5 Monitoring of access and outcomes identified

Monitoring of access to services is carried out by the Council's service groups. Most service groups have information – some more detailed than others - on service users disaggregated by race and other equality dimensions. However, there has been recognition in recent years of the need to improve the collation, interpretation and use of monitoring data in service delivery with regard to equality and diversity issues.

The Council's performance is assessed according to a set of performance indicators set out in its annual 'Best Value Performance Plan'¹¹. Targets and indicators that relate to equality and diversity objectives are included in the Council's Equality Action Plan for the period 2005-2008, as set out in its Equality Scheme (Wolverhampton City Council, 2004). Examples of targets oriented towards black and minority ethnic groups include:

- *Education outcomes*: to increase the percentage of 11 year old black and minority ethnic pupils achieving Level 4+ in English and Maths at key stage two (aged 7 to 11 years).
- *Access to health and social care*: to increase the access of people from black and minority ethnic communities to culturally appropriate home treatment, assertive outreach and psychological therapies.

¹¹ All local authorities in England are assessed according to a Best Value performance framework, incorporating a range of different performance indicators.

The Council's Scrutiny Review¹² process also contributes to the monitoring of services with regard to diversity issues. In 2006, the Council carried out a Scrutiny Review of access to services for people whose first language was not English, looking at how service users access services and the barriers that they face, and partly examining the implementation of the Wolverhampton Interpretation and Translation Service (Wolverhampton City Council, June 2006).

Similarly, the use of Equality Impact Assessments also contributes to the monitoring/evaluation of diversity issues. For example, the outcomes of an Equality Impact Assessment of regulatory services in 2003-2004 identified the need for job advertisements to be reviewed to ensure that the service was regarded as an equal opportunities employer; the need for engagement with the Afro-Caribbean community, Asian Women's Association and Asian section of the Chamber of Commerce to identify necessary changes to service delivery; and the use of interpreters (e.g. when explaining legal requirements).

5.6 Cultural awareness of staff

Cultural awareness is provided in corporate training courses, in which members of staff from different service groups participate. In addition, individual service groups provide their own training on cultural awareness of relevance to their services.

5.7 Discrimination against service users

The procurement procedures of Wolverhampton City Council require contractors to comply with race and other equality regulations. In addition, diversity considerations are reflected in contract specifications for service delivery.

As a member of the West Midlands Forum, the Council operates a Common Standard for Equalities in Public Procurement. Its procurement procedures use the Common Standard to monitor discrimination on grounds of race, gender, disability, religion, age and sexual orientation, of the Council's service providers (see section 5.2).

5.8 Special initiatives

The Council has an agreement with Wolverhampton Asylum Seeker and Refugee Services (WARS), which is a voluntary organisation, to provide advice and guidance services to asylum seekers and refugees. This agreement covers advice and guidance on housing (addressing issues of homelessness and tenancy sustainability).

The service is accessed mainly by asylum seekers, those who have been granted refugee status or leave to remain in the UK, and those who have been refused leave to remain (although limited assistance can be provided in the case of the latter). It is also used by other migrant groups (mainly East and Central European EU nationals). While some users have recently arrived in the UK, others may have been living in the UK for five or more years. The purpose of the service is mainly to signpost users to appropriate services, including legal

¹² Scrutiny Reviews involve elected members of a local authority. The role of members in a review process is to hold the Executive to account and to investigate issues of concerns to policy and service delivery.

services concerning immigration issues, health and education services, as well as to facilitate access to services (e.g. by helping to complete applications for social housing). In particular, there is high demand for help with accessing housing in the period immediately after people are granted leave to remain in the UK. This might include social housing in Council-owned accommodation or through private providers, as well as private rental housing.

A range of languages are spoken by WARS employees and volunteers, who are from a number of different countries of origin (e.g. Iraq, Somalia, Albania). This has helped in assisting service users. WARS advisers are currently able to see about 35 clients a day, although there is considered to be greater demand for the service on the basis of the number of clients who are turned away each day.

5.9 Impact of policy on access to and quality of services and lessons learnt

With a view to improving efforts to meet the needs of different groups, and to assess the impact of policies and initiatives, Wolverhampton City Council has taken steps to develop greater involvement of local communities in consultation processes on issues of access and the quality of services.

Wolverhampton Partnership (Wolverhampton's Local Strategic Partnership) has developed a Community and Public Involvement Strategy, launched in 2002, which is directed towards involving groups who are affected by, but under-represented in, decision-making processes; and obtaining the views of non-users of services. Linked to this strategy, the City's *Involvement Network* organises training workshops for staff on methods and approaches to public involvement, including how to involve communities whose voices are less heard in the assessment and planning of services. A 'measuring community involvement toolkit' has been developed, which includes measures on relevant and appropriate information/communication methods for different groups of people.

In order to operationalise the strategy, Wolverhampton City Council has produced a Community Involvement Framework and Guidance, which provides a step by step guide for staff conducting community involvement activities.

Wolverhampton's primary community engagement mechanism is the Local Area and Neighbourhood Arrangements (LANAs)¹³. There are 15 LANAs, which cover the whole of the City. LANAs are partnership arrangements between local people, elected members of the Council and service providers. They are intended to improve local areas and services through a process of Neighbourhood Action Planning, which is fed into the service planning processes of service providers. Each LANA is supported by a team or a community development worker. The LANA in the Graisleigh area of the City has been working with representatives from local Asian community groups and black and minority faith groups in this context, with a view to improving consultation with these groups on service planning and evaluation. Interpreters have been employed at neighbourhood management events, thereby helping to facilitate greater involvement of residents who do not speak English as a first language.

¹³ The Neighbourhood Management initiative within the City was established in 2002. LANAs have since replaced the former Local Area Forums and neighbourhood management teams.

6 Conclusion: Key challenges, lessons and learning for CLIP

Wolverhampton City Council has an established history of implementing diversity policies in employment and service provision. In line with race and other equalities legislation in the UK, its policies are aimed at promoting equality in employment and service provision with respect to all ethnic groups, and therefore do not target migrants specifically. However, some services, such as the Council's Asylum Seeker Team and the Wolverhampton Asylum Seeker and Refugee Service, are targeted at more recent migrant groups in Wolverhampton.

Key challenges and learning highlighted by the experience of Wolverhampton City Council include the following.

6.1 How to approach diversity

How diversity is approached raises issues concerning the aims of diversity policies in employment and service provision, and the outcomes for ethnic minority/migrant groups. As underlined, a key aim of Wolverhampton City Council's policies is to tackle inequalities and disadvantage amongst local communities, including both established residents and recent migrants to the City. This approach is considered fundamental to promoting a diverse and inclusive city.

It has, however, been difficult at times to ensure that the diversity/equality agenda is seen as a city-wide agenda, and not as a 'separate' policy issue or one that is only of relevance to particular groups. An important lesson has been the need to make clear links between diversity policies in employment and service provision with wider strategies and policy agendas.

6.2 Extending access to employment opportunities

Although the Council has a statutory duty to promote race equality in employment, including its recruitment policies, there are a number of challenges it faces in widening access to employment within the Council for more disadvantaged ethnic minority groups.

Much of the Council's recruitment requires applicants to have a number of years experience/recognised qualifications, e.g. in social work, and a high level of English language proficiency. This may exclude those with qualifications/experience obtained outside the UK, those without qualifications, and those who have lower levels of English language proficiency. As emphasised previously, staff recruitment for a wider range of vacancies in service provision is often the responsibility of contracted providers, not the Council.

There is considered to be a need for training and apprenticeship programmes in order to enable the Council (and contracted providers) to widen employment opportunities. Apprenticeships, linked to particular types of work, might allow for more targeted assistance, training and work placements, with a view to providing routes of entry into employment within the Council and its contracted providers. There is at present, however, a lack of funding for the Council to be able to develop these types of schemes. Wolverhampton Homes (which manages the provision of social housing), may, through possible additional funding in the near future, be in a position to implement an apprenticeship initiative to train people in

construction work.

An additional issue concerns the need for greater assistance with the process of applying to Council vacancies, given that migrant groups (e.g. refugees) may lack experience of recruitment systems in the UK, including the Council's procedures.

The Council is not directly responsible for the provision of English language courses, as this is provided through public funds available to further education colleges. However, given the importance of a high level of English language proficiency in Council recruitment requirements, there may be a need for combined apprenticeships and English language learning in order to extend employment opportunities for migrant groups.

6.3 Interpreting and translation services

Wolverhampton's experience with regard to the development of a city-wide Wolverhampton Interpreting and Translation Service (WITS) has highlighted the benefits of adopting a joint approach by the Council and other service providers in the City to the provision of these services. This has led to improvements in providers' access to and the quality of interpreting and translation services for service users. However, the City's experience has also emphasised the need to ensure that all service divisions of the Council and other service providers have the budgets in place to purchase interpreting and translation services available through WITS in order to adequately address language barriers to services.

6.4 Diversity policy in the context of contract-based provision

Ensuring that diversity objectives are adequately addressed in the context of contract-based service provision also poses challenges for the Council. Although the service groups/departments within the Council are expected to implement diversity objectives in their service plans and strategies, much of the delivery of the Council's services is now contracted out to independent providers. It is the role of service managers and commissioning/procurement managers within the Council to ensure that the services being delivered by contracted providers meet the Council's equality principles and objectives and work to reduce inequalities between communities. However, there are concerns about the level of information on contracted providers in terms of *how* their services are delivered and whether those services are meeting the Council's diversity and equality objectives. The West Midlands Common Standard for Equalities in Public Procurement has provided a means to addressing some of these concerns.

6.5 Community outreach activities

The Council's experience has emphasised the importance of outreach activities, by elected members of the Council, human resources staff, and staff from particular service groups. "Going out to communities", including visits to local places of worship, schools, and community centres, is considered vital in developing links between the Council and different groups and improving communication channels and understanding within the Council of the needs of the City's diverse communities, both with regard to employment and service provision. While the Council has organised targeted focus groups, inviting representatives of black and minority ethnic groups to give feedback e.g. on recruitment issues, which has been a useful mechanism, it has been necessary to use more informal routes of contact and dialogue in order to successfully engage with different communities. This includes

engagement with more recent migrant groups within the City, such as Iraqi Kurdish refugees.

Although the Council has a wide range of community contacts, more recent groups may lack organisational structures (such as community organisations), which limits access to organisational networks and forums for meetings with elected members and Council staff. There have been attempts to set up community organisations by more recent groups, including the City's Somali community and Iraqi Kurdish community. However, these organisations have not yet been established. There may therefore be a need for greater capacity-building and support for newer communities to be involved in community engagement/consultation processes with the Council and services providers, e.g. through the City's Public Involvement Network and the neighbourhood management initiatives.

6.6 Monitoring progress for established ethnic minority groups and migrant groups

A related issue concerns the current and future challenge for diversity policies in employment and service provision to be designed, implemented and monitored both in relation to ethnicity as well as migration status. New migrant groups include asylum seekers and refugees, and East and Central European migrant workers, whose entitlement to employment and to services (e.g. housing) varies. There is very limited information on migrants' access to employment and service provision. With regard to housing, in the light of this information gap, the Council's housing strategy division will be commissioning research on the housing needs of new migrant communities.

Current monitoring systems, based on the ethnicity categories used in the 2001 Census, do not identify employees/service users by their country of birth or immigration status, and therefore it is not possible to accurately monitor outcomes for different migrant groups (e.g. refugees). There is evidence that race/ethnicity, as opposed to being non-UK born¹⁴, has stronger effects in terms of inequalities in employment (such as earnings) (e.g. Dustmann and Fabri, 2005). There may, nevertheless, be a need for data systems to identify particular migrant groups by their immigration status in order to enable local authorities and other service providers to adequately monitor the impact of diversity policies in employment and service provision on those groups.

¹⁴ A 'migrant' is defined in analyses of data sets such as the Labour Force Survey as non-UK born (e.g. see Dustmann and Fabri, 2005). The effects of different types of immigration status (e.g. Indefinite Leave to Remain, EU National), which is not recorded in the Labour Force Survey, are not identified.

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