

## National Inclusion Standard Bronze Award

The Inclusive Employers' National Inclusion Standard is an evidence-based, objective, accreditation tool for assessing and promoting inclusion in the workplace. The Standard acts as a framework for delivering on an organisation's diversity and inclusion strategy, assisting them to measure and further improve the progress they are making towards becoming a more inclusive employer. It is a way to assess and acknowledge where the organisation is on its inclusion journey by way of its accreditation status.

In May 2019, Kirklees Council put in its inaugural submission to Inclusive Employers and in September we received the Bronze Award. The Submission Feedback Report (below) is structured around Six Pillars (Engage, Equip, Empower, Embed, Evaluate and Evolve). Subsequently a meeting took place between Inclusive Employers and lead officers for I&D to discuss more detailed feedback, particularly in the areas where the organisation needs to make more significant progress, namely the Empower, Embed, Evaluate and Evolve pillars. The following feedback should be viewed as valuable intelligence and insight for how Kirklees Council can improve performance and take forward some key priorities for our Year 3 Action Plan; not forgetting that we need to continue delivering on what we are currently doing well, particularly in the two pillars, Engage and Equip.

The following narrative and report from Inclusive Employers highlights areas where we performed well and others where there is room for improvement.

### The "Four" Pillars Where Improvement is Required

#### **Empower**

Although Kirklees Council has a wide range of consultation engagement platforms, there was only limited evidence about actual input, how it was used, and the difference, if any, that was made. There needed to be clearer focus on the use of consultation and other forms of engagement that could be used to develop strategies.

Reference was made to the use of inclusion specific surveys in contrast to the current pulse survey model, as this was felt to be set at too high a level to capture I&D information (e.g. age, gender issues, etc.). There was also an advantage to be gained by greater use of role models (e.g. on menopause and for international women's day). There was a recurring theme in the feedback, where a tendency to use 'cheerleading', characterised as 'shouting about something that's come up', as opposed to planned development leading to ongoing reflection and thinking of I&D in everyday working and relationships. It was also suggested that Kirklees could develop a framework that moves from awareness of I&D, to supporting I&D, to cheerleading, and then role modelling.

Two examples of 'cheerleading' were identified as the unconscious bias training undertaken by Cabinet and directors and National Inclusion Week itself. The organisation highlighted and promoted these two areas of activity when they occurred, however, the challenge was were we clear as to why and who should undergo the training and outside of National Inclusion Week, how are those issues engrained into everyday practice throughout the year.

The role of link directors for each employee network was seen as a good starting point, but their impact needs to be measured in terms of future development. Role modelling was also discussed in the context of the I&D Hub, and the wider issues of Hub membership and active involvement, along with the measurable benefit of High-5 awards.

***Actions to consider***

To develop ways of moving from 'cheerleading' to more effective and focused role model identification and development. Improve our consultation process to ensure we systematically feedback to consultees on the difference they have made (i.e. 'you said, we did'). Consider also developing a champions role profile and associated development programme.

**Embed**

This was the largest pillar in question terms, and it was noted that the organisation would be unlikely to score well, given the highly diverse range and nature of the organisation, its far-reaching statutory duties and wide range of services that it has to provide. While we had scored well overall in developing inclusion strategies, we had fared less well on the corporate strategy front. It was questionable whether showcasing statements in the action plan had given concrete bases for development and it was unclear as to whether there were any specific I&D objectives in certain plan areas. It was discussed whether we needed to review governance terms in relation to the Hub and where it reports to, and its membership. Under representation in the workforce and the development of those from equality groups in the workforce remains an issue to address. Furthermore, in relation to pay policies, the organisation has now published two annual gender pay gap reports but there is no action plan to outline how it will address the disparities that have been identified. In addition, it is highly likely that statutory ethnicity pay gap monitoring and reporting will be introduced in the near future and the organisation needs to be fully prepared to put this into practice and, again, address the inequities that are likely to be laid bare.

***Actions to consider***

Revise governance terms to include specific I&D objectives in action plan development and monitoring functions.

Incorporate HR more fully into policy implementation and monitoring.

Build annual I&D objectives into senior officers and senior elected members' performance targets.

Review of the appraisal system to include I&D.

Actively utilise recruitment and workforce planning data to inform and target under- representation in the workforce.

**Evaluate**

Discussion identified a clear need to capture I&D related data that can be used to link to, and engage more effectively with, the **Engage** pillar. Qualitative research and data capture need to become an integral part of the I&D evaluation. This feedback links to the organisation being truly intelligence-led and actively identifying the issues through data and then importantly using this to inform actions and activities to maximise impacts.

***Actions to consider***

Improve scope and range of data capture.

Address concerns surrounding confidentiality and consent-related issues expressed in the employee profile information gathering process.

Allow greater use of a qualitative approach to evaluate I&D action plan implementation.

**Evolve**

The organisation has bought into the idea of the business benefit of diversity and yet there is no clear way that we measure the return on investment. We have benefit greatly from the support from Inclusive Employers, who are an excellent support of best practice in other Councils and sectors. Nonetheless, our general horizon scanning and learning from others could be greatly improved. Both at a senior officer and political level, the past two years has seen a marked increase in I&D leadership, however, it is questionable how far this is demonstrated externally which can lead to a lack of innovation.

***Actions to consider***

Clarify and monitor our return on investment and clearly reflect this in outcomes and key performance indicators (KPIs).

Develop a Communications plan to promote best practice externally and identify more effective ways of learning from other organisations and sectors.



National  
**Inclusion**  
Standard

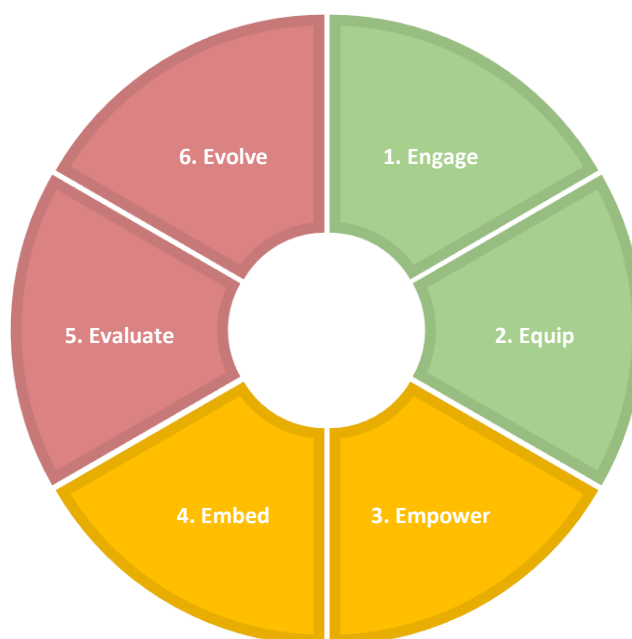
**2019**

**Submission  
Feedback Report**

**Kirklees Council**

**Bronze**

## Summary of your scoring by pillar



**Explanation:** the pie chart segments show the *relative* strength of your submission for each of the 6 pillars compared with the other pillars – so green indicates a higher-scoring area, amber a mid-scoring area and red a lower-scoring area. This pie chart does not relate to how well you have done in each pillar in comparison with other participants in the National Inclusion Standard.

## 1. Engage

Engage staff (at all levels) to ensure they have a good understanding and awareness of the organisation's vision for diversity and inclusion

Engage with staff so that the organisation has a good understanding of the employee experience from an inclusion perspective

Questions cover:

- 1.1 Diversity data collection methods
- 1.2 Breadth of data collection
- 1.3 Disclosure rates
- 1.4 Communications relating to monitoring
- 1.5 Broader inclusion communications
- 1.6 Participation in external inclusion campaigns
- 1.7 Engaging with under-represented groups
- 1.8 Staff survey

## This was a higher scoring area of your submission

**Areas of strength:** Efforts to seek to increase disclosure of diversity data have been undertaken within past three years via online and paper methods (for dispersed staff). An established Inclusion and Diversity plan is in place and is supported at senior level within the organisation. Evidence shows that some employee network groups exist and are well-established. There is an aspiration to relaunch and expand these to include additional protected characteristic groups. Narrative indicates organisation has celebrated National Inclusion Week since 2016 and evidence shows a broad range of activity, incorporating employees at all levels of the organisation.

**Areas to focus on:** No evidence provided of the mechanism for collecting data prior to or on joining the organisation. Narrative indicates a difference in opportunity to update diversity data if you are a dispersed employee as opposed to an employee with online access - consider increasing opportunities for dispersed employees to update their data. Evidence indicates disclosure rates are low for two of the protected characteristics currently tracked - consider efforts to boost these. Consider when updating the information with data collection communications including reassurances re data storage for dispersed staff and confidentiality and data storage for those completing online. This may encourage an increase in disclosure rates. Consider methods for communicating inclusion related activity to allow those without access to a computer to be included in comms. Consider how employee network groups can form part of consultation and decision making processes in the organisation. While evidence shows that the staff survey has some high level inclusion-related questions, this could be expanded to include some more explicit questions related to respect, fairness, harassment and discrimination. It would also be useful to have the ability to analyse the survey feedback by protected characteristics and take this into consideration when acting upon the survey results.

### 2. Equip

Equip all staff, managers and leaders through training, policies and guidance to build equality, diversity and inclusion into the work they do and the way they work.

Equip all staff to help the organisation design and deliver more effective and inclusive policies, processes and services.

Questions cover:

- 2.1 Policies
- 2.2 Staff training
- 2.3 Manager training
- 2.4 Policy guidance

**This was a higher scoring area of your submission**

**Areas of strength:** The evidence presented shows the organisation has a comprehensive range of inclusion policies in place. There are a variety of different inclusion training options available to all staff, covering a range of different topics. For managers, there is a new course on menopause and courses on coaching/emotional intelligence that incorporate elements of inclusion.

**Areas to focus on:** The organisation could consider reviewing their inclusion training offering, including a clear rationale for the approach and how it ties into the overall I&D strategy. It may be worth refining/expanding the offering and making some courses mandatory. Based on the information presented, whilst a range of inclusion training options are available to all staff, consider developing some diversity/inclusion training that is specifically designed for managers/leaders perhaps looking at appraisal, salary review, promotion, managing performance processes.

### 3. Empower

Empower by involving staff through networks, team discussions, Trade Unions and/or other channels. Value the contributions of everyone, including people from under-represented groups and ensuring inclusion and diversity makes a positive difference.

Empower by providing support and encouragement to staff to develop their careers and increase their contributions to the organisation through the enhancement of their skills and abilities.

Questions cover:

3.1 Consultation

3.2 Staff self-organised inclusion-related activities

3.3 Recognising the contribution of staff who self-organise

3.4 Role models

3.5 Champions

3.6 Accessibility of mainstream career enhancing learning and development opportunities

**This was a mid-scoring area of your submission**

**Areas of strength:** Narrative shows a governance structure is in place for consultation that includes trade unions and an annual staff survey. Staff have been involved in organising inclusion activities - predominantly through the employee networks. The YEN network appears to be particularly active and this group has created a Young Inclusion award. The senior team are engaged in wanting to operate as inclusion champions and have received training on how to do this. Evidence shows all staff are offered the possibility of coaching and mentoring and to be nominated for the level 3 aspiring managers' programme.

**Areas to focus on:** Methods are in place for seeking employee input on organisational decision making but it is not clear what specific items have been fed back and taken on board. Consider developing this approach for future similar activity. The YEN and BME networks are active and have organised successful events - other networks could take inspiration from these to increase their activity and impact. Consider expanding on current processes for employee recognition and introduce a formal inclusion recognition element - either as part of an existing scheme or a new one. Some role models have been profiled as part of one-off events but evidence not provided that demonstrates their impact beyond one session. The organisation could look to focus on specific individuals in such a way that their impact as inclusion role models is deepened. Consider a more systemic approach for inclusion champions to build on their current 'cheerleading' role and provide a clear vision as to how /what their impact is.

#### 4. Embed

Build a shared responsibility and accountability for achieving improvements by explicitly embedding inclusion and diversity into everything the organisation does.

This includes embedding inclusion and diversity into the organisation's corporate strategy, any processes and policies to improve its ability to attract and retain the best talent and through its procurement processes.

Questions cover:

- 4.1 Corporate strategy/KPIs
- 4.2 Inclusion strategy
- 4.3 Departmental business plans
- 4.4 Governance
- 4.5 Wider decision-making
- 4.6 Pay policies
- 4.7 Recruitment
- 4.8 Positive action
- 4.9 Performance development review
- 4.10 Board awareness
- 4.11 Procurement

**This was a mid-scoring area of your submission**



**Areas of strength:** Inclusion and diversity is included in the corporate strategy and plan. This plan has been in place for some time and is now in its second iteration, having been reviewed and reported on. Correctly used, the Equality Impact Assessment form provides a practical tool to evaluate likely impact on employees and external parties.

**Areas to focus on:** At present, inclusion and diversity are not included in departmental business plans, consider whether senior leaders could set D&I objectives for their teams and cascade these through the organisation. While gender pay gap reporting is taking place, the narrative does not show the practical actions that are being put in place to remedy any issues. The responses suggest that the organisation could be doing more to attract and develop those from under-represented groups through recruitment. At present there are no D&I considerations as part of the performance review process. To date, evidence suggests little has been done to boost the knowledge and understanding of the senior team in the D&I space, however it is noted that a training session is planned. Consider a review of the procurement process to account for how diversity and inclusion can be reflected outside of what is required by EU law.

## 5. Evaluate

Evaluate diversity and inclusion progress to set relevant and achievable interventions/ targets

Questions cover:

5.1 Using profile data

5.2 Using wider data

5.3 Qualitative research

### **This was a lower scoring area of your submission**

**Areas of strength:** Evidence shows that a monthly reporting regime is in place within the organisation to review diversity data relating to headcount.

**Areas to focus on:** No evidence provided that demonstrates how diversity data is being used in the employee lifecycle - this would be a useful area to focus on going forwards. Collection of qualitative data to gain insight into the success of existing/plan future inclusion and diversity objectives would also be advantageous.

## 6. Evolve

Evolve by continuously learning and drawing on best practice to devise innovative and creative interventions

Questions cover:

6.1 Return on investment

6.2 External horizon scanning to drive innovation internally

6.3 Leadership to drive innovation externally

**This was a lower scoring area of your submission**

**Areas of strength:** Membership of Inclusive Employers is seen as a valuable means of obtaining thought leadership on D&I and this has already resulted in a tangible benefit to the D&I programme.

**Areas to focus on:** Evidence indicates no measure of Return On Investment currently in place - a focus on identifying ways to do this and incorporate them into KPI's for effectiveness of the D&I programme would be recommended. Consider options for learning and sharing best practice externally.

**Summary of the assessment, including any key areas for future focus/development and any areas of recognition and good practice:**

The evidence indicates that this organisation is well-established in its consideration of diversity and inclusion as part of its corporate strategy. A D&I filter is used for external considerations, as well as internal. One issue which could be limiting the effectiveness of its internal inclusion programme is the disparity between those who have online access during the day and those that do not, as many of the communications in this area seem to rely on the corporate intranet (including the ability to self-update diversity information). The organisation struggled to score in the Embed pillar, many of the low scoring questions related to the application of inclusion principles to management practices, such as the setting of departmental objectives, the performance review process and the procurement process. This theme continued for the Evaluate pillar where evidence was not available to demonstrate consideration of diversity data (quantitative or qualitative) in the employee lifecycle. Return on Investment assessed in the Evolve pillar would also be a recommended focus area and will really help push the organisation to the next level with regards to their inclusion related activity.

**Comment from the panel:**

This organisation has a very solid foundation to build on. There is a breadth of policies and activity in place and the areas of best practice should be used as a model to build on areas where more activity is needed particularly for the latter 3 pillars. It should take steps to further embed diversity and inclusion into its business processes.

**Any recommended quick wins:**

Sensitive phrasing of questions, confidentiality and data storage assurances for online staff could increase diversity data disclosure rates. Relaunch of the employee network groups could lead to new energy and direction in the inclusion space. There is great momentum around comms and activity for National Inclusion Week, consider replicating this for other campaigns such as a role model campaign.

**Recommended longer term actions:**

Consider the employee lifecycle and how inclusion could be more intimately tied into the various aspects of this, starting with the production and reporting of data at key stages. Identify Return On Investment measures for the D&I strategy, gender pay gap actions and recommendations. Consider recruitment strategies to target under-represented groups. Consider how senior leadership can develop themselves as inclusion champions and role models.

