

## Review of equalities and HR policies and practice at Brent Council

### Foreword

Two core values underpin this review:

Every Brent Council employee deserves to be treated with dignity and respect.

Every employee deserves the opportunity to rise within Brent Council, regardless of their background. Indeed, the Council benefits enormously from the diversity of its workforce, and would be enhanced further by greater diversity in senior management.

This review finds that Brent is generally a happy and inclusive place to work. But there is plenty we can do better.

Policies are mostly sound. But policies are implemented by people and we need to do more to ensure that they are consistently applied. When this does not happen we need to work harder to ensure that the whole Council learns the lessons.

This review recommends changes which aim to systematically embed best practice across the Council, to ensure that treating one another with dignity and respect is at the very heart of everything we do.

Two-thirds of Brent Council employees are from Black, Asian & Minority Ethnic communities. This makes us the most diverse Council in London and probably in the world. Everyone in Brent should be immensely proud of this. But we should also be immensely disappointed that only 14% of our most senior staff are from BAME communities. It is even more disappointing that this meagre figure is actually one of the very best in London!

Underrepresentation of BAME groups in senior management was identified by all participants in this review as a critical challenge. This isn't just a Brent problem – it is a serious issue across the whole country. Shockingly, the percentage of public appointments made to BAME people has virtually halved in the last five years.

The moral case against this is crystal clear. But the fact that underrepresentation is actually worsening shows that, sadly, the moral case alone is insufficient. Fortunately there is an equally strong business case. Analysis by McKinsey into private sector boardrooms shows that diverse boards generate far bigger profits than ethnically narrow boards.

This is hugely relevant for Brent Council. We are facing immensely difficult times with plummeting budgets and escalating costs. We simply cannot afford to waste talent: we need the very best people in management. Greater diversity in senior management will broaden our perspectives, maximise the potential for creative ideas and increase our understanding of the

communities we serve.

There is a long history of well-meaning attempts to improve diversity at the top, but ultimately they have achieved very little. All participants in this review rejected anything which smacks of tokenism. Consequently the review makes recommendations which seek to draw upon the unique diversity of Brent to produce a bespoke model for real change.

We want to encourage, develop and support our best talent from underrepresented groups. But at the same time we want to grapple with the uncomfortable truths around unconscious bias. We want to maximise opportunities for all Brent Council staff to rise within the organisation, regardless of background. But it is not simply a lack of talent or ambition amongst BAME communities which makes senior management overwhelmingly white - and we want to challenge everyone at the top to recognise this.

BAME underrepresentation in management is a major national problem. It will take time for Brent to change. But change is exactly what this report attempts to achieve. We want Brent Council to become a trailblazer, so that in years to come we can all be as proud of our diverse management as we are of our diverse workforce and our diverse community.

I'd like to thank everyone who helped to produce this report: all the staff who shared their thoughts with me, face to face and in writing; all the elected Members who contributed such rich ideas; the Trade Unions and all the external partners who offered their invaluable expertise.

Every one of us has a vital role to play in making the recommendations in this report a reality. Let's work together to make it happen.

**Cllr Michael Pavey**  
**Deputy Leader of Brent Council**  
**December 2014**

## **1. Purpose of the Review**

Brent Council is deeply committed to equality, diversity and inclusion. This review was established to ensure that our HR and Equalities policies and practices reflect this commitment.

The Terms of Reference set out the areas that the review would cover:

- surveying a comprehensive suite of policies to identify those which need detailed consideration
- reviewing those which need detailed consideration
- reviewing staff knowledge, understanding and practice
- reviewing progress towards the Gold standard in Investors in People
- reviewing progress towards the Excellence Standard in the Equality

#### Framework for Local Government

- ensuring that diversity underpins all aspects of the review, including BAME involvement.

#### Methods included:

- analysis and scrutiny of written reports and documentation
- discussion with staff
- discussion with Members
- advice from external experts
- use of staff focus groups
- best practice comparison with other local authorities.

The review was specifically tasked with making recommendations for improvement where appropriate.

The review therefore focused on the policies and practice of the organisation. There was a specific emphasis on making recommendations to ensure that the diversity of staff reflects the diversity of the borough, at all levels, and that working practices and organisational culture enable this outcome. Analysis of HR policies and processes formed a significant part of the review, as these are a key mechanism for enacting our organisational objectives and values with our personnel.

It is important to note that the review was not a review of our HR department. It is about the role each person has to play in making Brent Council the best possible place to work. There are clear recommendations in relation to employment policies and practice, and these require the action of the entire organisation and crucially managers at all levels.

## 2. Methodology

The review considered a range of information sources and commissioned work-streams:

- LGA review of policies: The LGA reviewed the Council's relevant employment policies – the scope and recommendations are set out in appendix one at the end of this report.
- Focus groups with staff: these were facilitated by a new Operational Director. Participants were randomly selected from payroll records<sup>1</sup> to enable two general staff focus groups and one for middle managers. Participants were asked to comment on management engagement and to share their experience at the Council before contributing ideas for improvement.
- Roundtables with external stakeholders, examining:

---

<sup>1</sup> For general staff focus groups, each 66<sup>th</sup> employee on the payroll list was selected; for managers, each 28<sup>th</sup>. Each group was widely representative both of ethnicity and of pay scale.

- Increasing the number of BAME staff in senior positions
- Ensuring that the culture of the organisation is an open and positive one

Stakeholders included a range of skilled professionals with a wealth of experience across staff management and equalities practice within the public, private, advisory and not-for-profit sectors. They were:

- Dr Doyin Atewologun, Queen Mary University
  - Peter Hall, Employers Network for Equality and Inclusion
  - Vernal Scott, Marshall ACM
  - Diane Rutherford, BRAP equalities charity
  - Stephen Shashoua, Three Faiths Forum
  - Matthew Critchlow, Thrive Training
- Drop-in sessions to provide the opportunity for any member of staff to provide views.
  - Opportunities for staff to provide views anonymously.
  - Discussions with Trade Unions and written submissions from UNISON the GMB, the NUT and Unite.
  - The Council's Investors in People (IIP) Adviser, accompanied by a BAME adviser new to the Borough, reviewed progress towards the Gold standard. This involved discussions with a number of focus groups with participants selected randomly from payroll records.<sup>1</sup>
  - Additional external oversight was provided by Charles Obazuaye, Director of Human Resources at the London Borough of Bromley. Mr Obazuaye provided expert advice at the start of the review and commented in detail on the draft report.
  - A review of equalities data – encompassing recruitment, retention, progress across the equality characteristics. The Brent Diversity Profile is attached to this report as Appendix 2.
  - Meetings were held with the HR Departmental Management Team and the Diversity Reference Group- in order to assess staff knowledge, understanding and practice of policies, and to suggest improvements.

### **3. Current status and recent achievements**

Over recent years, Brent has taken a much more systematic approach to policies, practice and evaluation, in keeping with best practice. As the IIP assessor wrote, 'Leadership is strong, embraces the critical role of people management and exemplifies a willingness to improve and develop.'

Notable improvements include:

- The modernisation of staff management policies and procedures.

- Achievement of the Investors in People (IIP) Silver standard – an achievement made by a handful of employers.
- Committing to the Excellence in Equality Framework for Local Government, one of a small minority of local authorities to do so.
- Re-accredited as a “Two Ticks” employer (*‘positive about disabled people’*).
- A methodical approach to equalities monitoring and undertaking equality analysis on employment policies and procedures
- Establishment of the Diversity Reference Group, chaired by the Chief Executive, to assess and improve practice across services – addressing both internal and external (resident service) issues to underpin equality.
- Joined Stonewall’s Diversity Champions Programme to strengthen sexual orientation equality in the workplace.
- A more systematic approach to consultation with staff on HR policies, procedures and practice through the Trade Unions and HR Improvement Group.

Improvement plans include:

- Working towards Excellence in the Equality Framework for Local Government, which replaced the Equality Standard for Local Government in 2009, under which the Council had received an ‘adequate’ rating.
- Working towards the IIP Gold standard.
- Joining Race for Opportunity, the race campaign from Business in the Community, designed to improve employment opportunities for BAME people and to increase raise diversity at Board, senior executive and management level.
- Joining the Stonewall Workplace Equality Index.
- An equal pay audit to identify and eliminate any unjustifiable pay gaps.

In terms of practice, the Council has:

- Rolled out flexible working across the organisation.
- Established a programme to recruit 100 apprentices over the next three years, with 20 per cent of places reserved for Brent Looked After Children.
- Addressed income inequality directly by becoming a Living Wage employer.
- Established a learning development programme which encompasses skills and technical development.

### ***What does the data tell us?***

Brent’s workforce equalities report, covering the period from April 2013 to March 2014 shows that:

- The ethnic diversity of the workforce closely reflects the community it serves; Brent has the highest proportion of BAME staff amongst

London boroughs and the proportion of BAME top earners is in the top quartile of London boroughs.

- Brent has excellent retention rates for disabled staff – in fact, the number of disabled employees increased at a time of reducing staff levels, meaning either that staff feel more confident to disclose that they have a disability or that the proportion of disabled staff is now higher.
- Brent achieves strong rates of retention for staff returning from maternity leave, a reflection of the emphasis that has been placed on flexible working.

However:

- Though the Council tends to outperform its peers in local government, BAME, disabled and female members of staff are under-represented at senior management level, compared to the overall workforce – this is examined in more detail in the findings section of this report below.
- The proportion of Asian, disabled, Hindu and Muslim job applicants fell at each stage of the recruitment process.

#### **4. Findings**

It was very welcome to see a number of Council staff provide input into the review. Some of these submissions related to particular policies and policy changes. Each of these issues was investigated as part of this review.

Two staff workshops indicated some gaps in management practice. The overwhelming majority of attendees had regular team meetings and one-to-ones with their managers, but at the two non-management workshops 45% and 30% respectively said they had not had an appraisal in the last twelve months. More than half at each session had not seen a copy of their team or service plan.

Overall, feedback from across workstreams of this review indicates good policy and practice. Staff and manager focus groups noted the positive impact of being co-located at the Civic Centre, good provision of training and development, and the commitment to flexible working. The IIP interim assessment commissioned to inform this review shows that the foundations are in place to achieve more, noting that the organisation is 'ahead of the game' in its approach to leadership, management and people issues. The assessment cites the positive impacts of policies and systems, as well as leadership, both managerial and political.

However, as the data shows, there are long standing inconsistencies regarding the representation of employees from different backgrounds at the highest tiers of the organisation. Brent achieves better than the majority of its peers in relation to diversity, but the baseline for comparison is disappointingly low, so that comparisons are an ineffective measure of good practice. Engagement across the workstreams that informed this review shows that, unsurprisingly, this gap is recognised by staff, management and stakeholders alike as stated via the different engagement mechanisms.

This is a serious national issue. Underrepresentation of BAME communities in leadership positions in the UK is actually worsening. In 2001/2, 8.6% of public appointments and reappointments went to members of BAME communities. This figure peaked at 9.2% in 2006/7 before trending downwards to just 5.5% in 2012/13.

It would be easy for Brent Council to hide behind this national picture but we are adamant that our residents deserve the very best, and we believe that diverse leadership is a significant step towards achieving this.

It is incredibly important to the political and managerial leadership of the Council that the organisation is an inclusive, equal opportunities employer. The workforce – at all levels – should reflect the community it serves, one of the most diverse in the UK. The Council is an organisation that draws its legitimacy from its community and it is therefore only right that its political representatives and its officers reflect that community. Within focus groups, staff and managers all cited diversity within both the community and the organisation as a key attraction to working for Brent Council, and this has been reiterated by individual anonymous submissions.

Being inclusive and reflecting diversity is not only an expression of our values, it is a matter of good business sense. There is now abundant evidence that organisational diversity is directly linked to performance. Research by McKinsey<sup>2</sup> into private sector boardrooms has found that diverse boards generate 66% better average returns on equity than narrowly comprised boards. In the public sector, Roger Kline<sup>3</sup> has drawn upon comprehensive research to show five ways in which NHS organisations lose out through a lack of diversity:

- a. Patients may be prevented from getting the best clinicians and support staff if candidates' ethnicity unfairly influences recruitment and promotion or leads to BAME staff being unfairly treated in the disciplinary process or in other aspects of their working life.
- b. If BAME staff are treated unfairly then that is likely to have an impact on morale, absenteeism, productivity, and turnover. It will also lead to the loss of time and money through grievances, employment tribunals and reputational damage.
- c. There is an established link between the treatment of BAME staff and the care that patients receive. Research shows the workplace treatment of BAME staff is a very good barometer of the climate of respect and care for all within NHS trusts and correlates with patient experience.
- d. There is evidence of a link between diversity in teams (at every level including Boards) and innovation. At a time when the NHS needs to

---

<sup>2</sup> Thomas Barta, Markus Kleiner & Tilo Neumann, 'Is there a payoff from top-team diversity?' McKinsey Quarterly, April, 2012.

<sup>3</sup> Roger Kline, 'The 'snowy white peaks' of the NHS: a survey of discrimination in governance and leadership and the potential impact on patient care in London and England.' Middlesex University Research Repository, 2014.

transform its care, lack of diversity may carry a cost in patient care for everyone

- e. Leadership bodies which are significantly unrepresentative of their local communities, such as NHS Trust Boards, will have more difficulty ensuring that care is genuinely patient centred – with resultant failings in the provision or quality of services to specific local communities that have particular health needs, including BAME communities and patients.

Although local government differs from the private sector and from the NHS, facing its own challenges and idiosyncrasies, diversity at all levels is equally important and equally valuable from a business point of view. By accurately representing our community and by drawing on the talents of the widest variety of people, we can operate more effectively, efficiently and innovatively.

There was a broad consensus from all the people contributing views about the need to address this issue within the organisation, using the diverse talent that already exists, and this is reflected within the recommendations.

In terms of the culture of the organisation, the consensus is that it is open and inclusive. However, it needs to take practical steps to translate values into competency and practice. A key theme across workstreams has been that policies are implemented by people, so we need to ensure consistency in applying those policies. This has been highlighted by staff, HR professionals, the LGA, Investor in People (liP) assessors and the trade unions alike.

The Council has successfully delivered intense change at a time of significant challenge. Change management skills, including the ability to support staff appropriately, are increasingly important.

On a functional level, the review has provided the opportunity to assess the detail of policy and practice and this is reflected in the findings set out below.

## 5. Overall issues

**5.1 Finding: There has been significant modernisation and improvement of management policies and practice. This has been recognised in focus groups and the Council is well on track to achieve gold status in liP this year. This is impressive and only achieved by two per cent of organisations.**

- The Council needs to continue on its improvement journey, using external assessment and internal engagement to measure progress and inform improvements.
- The move to a single location has provided for great opportunities in terms of shared learning and culture, which may not have been fully realised.



- Flexible working is appreciated and cited as a positive aspect of working at the Council, but focus groups suggest that there may be inconsistencies in application by managers, which should be addressed.
- The Council has benefitted from experienced and skilled interim appointments during a time of unprecedented change. The Council is now very well placed to move forward with permanent appointments and build on recent successes noted in the review process.

**5.2 Finding: Diversity is celebrated and prioritised, but the senior management of the Council is not representative of the community it services, nor of the diversity of the wider workforce.**

- We are not reflecting the diversity of our population at senior levels, nor tapping sufficiently into the talent of our entire workforce.
- There is a lack of progression for BAME staff, resulting in a deficit in representation at senior levels. Whilst we can demonstrate better performance than the majority of our local government peers, our performance is not good enough. There is a clear drop-off in progression for BAME staff from grade PO3 to PO6, becoming even more pronounced at higher grades<sup>4</sup>, thus indicating barriers to the progression of staff from these backgrounds:

Grade	SC3-6	S1-P2	P3-6	P7-8	HAY
% BAME staff	69	68	52	32	14

- As the table above shows, whilst the proportion of BAME staff at Scales 3-6 and SO1 – PO2 are at 69 per cent and 68 per cent respectively, the proportion drops to 32 per cent at grades PO7-PO8 and to just 14 per cent for Hay graded staff.
- Breaking down the HAY grade further, 10.1% of the 14% BAME figure are Asian, and only 2.5% are Black. Within the PO grades, the equivalent figures are 21% Asian and 29% Black, whilst across the organisation as a whole 26% are Asian and 31% are Black. So in addition to the general underrepresentation of BAME communities in management positions, there appears to be a further issue of underrepresentation of the Black community in the most senior positions.
- It will take time to change this picture. This report makes a series of recommendations which hopefully will lead to change, however it is important to manage expectations about the timescale entailed for them to take effect. It is also important to recognise that not everyone wants to be a manager. But it is essential to ensure that those who do wish to manage should be able to rise through the system solely on the

---

<sup>4</sup> Brent Diversity Profile 2013-14

basis of their ability and work. Equally importantly, everyone in the organisation, manager or otherwise, deserves to be treated with dignity and respect at all times.

- In terms of disabled staff, there is uneven distribution across grades, but there does not appear to be an issue regarding progression. We should, however, be mindful that employees may become disabled during the course of their employment at the council: we should therefore ensure that managers are aware of the need to provide reasonable adaptations for staff affected in this way.
- As regards female staff, whilst there appears to be a drop-off at higher grades, this appears to be a function of the higher proportion of women within the workforce at lower grades than is the case in the local population; thus the proportion of women at higher grades has a greater correlation with the general population than at lower tiers. The equality delivered via single status is likely to reinforce our attractiveness as an employer, and we should continue to ensure that our practice remains consistent with our values.
- Attempts specifically to address deficits in progression across equality characteristics do not appear to be effective; whilst BAME staff are more likely to undertake training opportunities, this is not resulting in the same career progression enjoyed by non BAME staff. A systematic approach that achieves positive change is required.
- Across the different engagement mechanisms, notably the staff focus groups and stakeholder roundtables, there was a clear rejection of initiatives that are perceived to be tokenistic and superficial. It is of course desirable that posts offered externally result in greater diversity at senior levels, but there is clear support for approaches that enable us to 'grow our own'. Such an approach has the advantage of being more sustainable, by providing a supply of skilled senior managers who reflect the borough's diversity and by demonstrating that equality is embedded at all levels. However, this too should be embedded in good leadership and management at all levels.
- An innovative mentoring programme to support the development of underrepresented groups would certainly be positive. However this must be a bespoke offer, reflecting the uniqueness of Brent and the challenges faced by our communities. An 'off the shelf' initiative would be a wasted opportunity. Instead, we should work with Brent employees to design a programme reflecting the unique makeup of Brent and the specific challenges faced by our communities. In establishing this programme, the Council should consider options such as increasing opportunities for secondment within the organisation and actively encouraging staff from one department to undertake projects in another. The Cabinet in Brent reflects the diversity of the borough well and more could be made of this in support of the council's leadership and management programmes. Indeed, interaction with elected

members, more generally, could do much to increase understanding of diversity and equalities in Brent. A new development programme offers the opportunity to widen access to these experiences.

- The Council must be honest and acknowledge national research which shows that well-meaning development initiatives alone are insufficient. We are all at risk of unconscious bias<sup>5</sup> so the Council should explore robust interventions such as reverse mentoring<sup>6</sup> of senior management.
- Overall, it was considered that learning and development has improved over the past year, for example, staff reported within the liP interim assessment that ‘Training and development are now very proactive’. However, we need to strengthen our approach to succession planning, talent management and progression, beyond those schemes operating at entry level (apprenticeships and graduate schemes). We lack consistency across the organisation in encouraging talent and ensuring progression – addressing this would represent an opportunity to promote consistent representation of all equality characteristics at different levels within the organisation – and perhaps begin to tackle the BAME deficit at the top tiers of the Council.
- Whilst the local apprenticeship scheme enjoys high levels of inclusion for BAME staff, the intake for graduates from the National Graduate Development Programme is less diverse. This might be expected given that the national diversity profile is much lower than that of Brent. There may be opportunities to be more inclusive by placing a greater emphasis on local recruitment or by introducing an in-house management training scheme. Indeed, staff groups suggested that this could be a way to increase diversity at senior levels.
- Guidance from the Equality and Human Rights Commission (EHRC 2012) states: “Because the general equality duty requires you to analyse the effect of your organisation's functions on all protected groups, public authorities will not be able to meet the duty unless they have enough usable information.” Brent collates a good range of data which is presented in an accessible manner (see appendix 2.) This data should be shared widely and used as the benchmark from which to build progress. However, there are areas where data collection could be improved, and thus services enhanced. In general terms, better recording of the reasons for decisions at each stage of the recruitment and selection process would increase understanding and perhaps point to the actions necessary for improvement. More specifically the Council should collect equalities data on all shortlisted candidates. In the case of existing employees, the Council is highly

---

<sup>5</sup> Embedded ‘people preferences’, formed by our environment, experiences and other peoples’ views about other groups of people, which may affect our attitude to people based on their personal characteristics or background

<sup>6</sup> ‘Reverse mentoring’ refers to an initiative whereby a more senior executive is paired with a more junior employee, in order to offer insight and experience into aspects of working life the executive may not have had exposure to, with regards to, for example, age, gender, ethnicity, or technological knowledge.

dependent upon self-declaration. Participation rates are improving but the transfer of data to Oracle presented problems as staff had to re-enter data. According to the most recent intranet message, 94% of staff have yet to fill out their equality data on Oracle. It is understandable that completion of equality forms often feels like additional bureaucracy, but efforts must be made to show staff that submitting their equalities information is actually a vital step to gradually addressing the challenges faced by underrepresented groups.

- Recruitment data should be supplemented with qualitative information, so the Council should consider setting up a focus group of randomly selected new-starters to test their experience of our recruitment and selection processes.
- In terms of service delivery for the Brent community, the Council should consider updating the categories it uses when collecting data to reflect the changing profile of Brent. Specific categories for the Somali, Eastern European and Latin communities would enhance the quality of data collected.

## Issues regarding policies

### **5.3 Finding: There have been significant improvements to the Council's policies. However, further revisions to those policies are required in order to ensure robustness and ongoing adherence to best practice.**

- The independent LGA review was generally positive about the core policies but identified some improvements in key policies, which would strengthen our framework.
- Feedback received from the GMB union suggests support for the majority of changes suggested by the LGA, as well as support for the Council's overall approach to the issues examined by this review.
- The NUT has separately requested that the Council clarifies the difference between sickness absence and medical appointments for disabled staff.

## Issues regarding practice

### **5.4 Finding: Generally, feedback from staff themselves suggests that practice is good; however, improvements can and should be made to employee management practice to achieve a more collaborative and inclusive culture.**

- Engagement with staff suggests inconsistent application of policies and procedures, including as regards flexible working. There has clearly been great progress in implementing good management practice, but the Council should also seek to ensure that internal communications

explain expected practice, underpinned by a clear explication of staff and manager competencies and behaviours.

- At present, there are few reported incidents of bullying and harassment. The Council has an emphasis on informal resolution: according to the LGA this represents good practice. Consideration should be given to ensuring consistency, support and follow up within the informal resolution framework.
- The Council lacks a systematic Council-wide approach to learning from HR and legal processes when complaints are raised; whilst this is not uncommon, we have an opportunity to make improvements. In addition, this may give rise to inconsistent management responses. Thus, though HR takes the lead, individual managers are responsible for learning from ETs and grievances, and reviews take place with HR and within departments. Improvements should be made in terms of cross-organisational learning, peer review and Council-wide improvements.
- The Code of Conduct does not at present adequately articulate the behaviours and practice expected of managers and staff. Such behaviours should be clearly articulated, communicated and reflected in:
  - recruitment and selection processes
  - ongoing team and line management
  - appraisal processes
  - learning development processes and interventions.

Addressing this presents an opportunity to emphasise the significant priority the Council attaches to valuing diversity.

- Evaluation of practice and understanding of staff experience should be regular and Council-wide.
- Internal communications should be strengthened to become a two-way flow of information. It is critical for senior management to be able to communicate values and good practice to the wider workforce. But it is equally important that communications enables the wider workforce to articulate their experiences to senior management. In two staff focus groups, more than half had not seen a copy of their service or team plan and participants suggested that improvements could be made to internal communications, including the ability for greater staff engagement and management visibility, for example through senior managers attending team meetings. This is increasingly important given the scale and pace of change. Managers themselves need to be supported to communicate effectively, but must also play the key role in staff engagement. Given the current and future constraints on funding, it is important that central advice and strategy is complemented by good practice within departments.

In summary, the four key issues are:

1. **There has been significant modernisation and improvement of management policies and practice. This has been recognised in focus groups and the Council is well on track to achieve gold status in liP this year. This is impressive and only achieved by two per cent of organisations.**
2. **Diversity is celebrated and prioritised, but the senior management of the Council is not representative of the community it services, nor of the diversity of the wider workforce.**
3. **There have been significant improvements to the Council's policies. However, further revisions to those policies are required in order to ensure robustness and ongoing adherence to best practice.**
4. **Generally, feedback from staff themselves suggests that practice is good; however, improvements can and should be made to employee management practice to achieve a more collaborative and inclusive culture.**

Section 6 below sets out recommendations to address these.

## 6. Recommendations

It should be noted that recommendations do not seek to impose a prescriptive approach, but to provide a framework and support to address the issues identified. We should ensure that clear expectations are set for all staff and managers regarding objectives and behaviours, provide the support to meet those expectations – and trust them to deliver. Evaluating success in delivery and ensuring consistency of outcomes must also be a key element within our approach. **Officers should be charged with producing an action responding to the recommendations set out below.**

### 6.1 Achieving consistency in staff progression and diversity at management levels

The Council needs to ensure that senior staff recruitment achieves greater diversity, when it recruits staff externally and by being more successful in promoting internal talent from our diverse workforce. A systematic approach to progression is likely to assist in addressing specific recruitment and retention issues, such as in Children's Services, by 'growing our own'.

- a. The Council should consider how to have a more systematic and successful approach to the progression of its own staff to more senior positions. There should be an expectation of all managers to recognise and nurture talent, supported by appropriate organisational inputs, such as providing opportunities to experience new responsibilities and for involvement in projects to develop experience and skills, support for development and qualifications, mentoring and coaching. This expectation should be clearly articulated in the Council's competency

framework. Talent should be identified within all sections of the Council, not merely from the professions from which those at the top table are traditionally drawn. There is a need to accelerate plans to support the career progression of high-potential staff from groups currently under-represented – this review notes the importance of this being a Council-wide responsibility and an integral part of managing people. **Council officers are therefore asked to prepare a report establishing how we can identify talent internally in a more structured way, supporting managers to ensure that staff are linked into and benefit from development opportunities and the support required to progress.**

- b. The Council should devise an **innovative mentoring programme** to support the development of underrepresented groups. This must be a bespoke offer, reflecting the uniqueness of Brent and the challenges faced by our communities, and the challenges faced by members of those communities hoping to build a management career in Brent. Brent employees should be actively involved in developing this scheme.
- c. The Council should set up a **'reverse mentoring' programme** to broaden managers' understanding of staff experiences and barriers to progression for staff from groups underrepresented at management level.
- d. The Council should audit its provision of **unconscious bias training** and ensure that every employee and, indeed, every elected member undertaking recruitment and selection has undertaken this training.
- e. **There should be a process for ensuring that training meets both organisational and personal professional development objectives.**
- f. **Recruitment, appraisal and progression should be competency based**, thus reducing factors that may have counted against diversity by replicating historical barriers for under-represented groups, such as educational attainment. This does not imply compromising quality, on the contrary, it emphasises the skills and behaviours required to do the job.
- g. **Any member of staff or elected member involved in recruitment and selection must have been trained in the process.** At the same time, there needs to be more **comprehensive recording of the decisions made at different stages of the recruitment and selection process** with regular summary reports considered by the HR Improvement Group.
- h. The Council **should review the success both of its apprenticeship programme and its participation in the National Graduate Development Programme for Local Government.** Participants on

both schemes should be asked about their experiences and if the schemes can be improved.

- i. **The Council should introduce a local graduate development programme to complement the national scheme**, enabling access to our talented local graduates who come from one of the most diverse and exciting places in the UK.
- j. **The Council should undertake research with applicants to understand the reasons behind the attrition rate for Asian, disabled, Hindu and Muslim job applicants within the recruitment process, in order to inform improvements in the process.**
- k. When undertaking recruitment **the Council should aim to collect equalities data on all shortlisted candidates**. The Council should undertake a corporate push with senior leadership encouraging **all employees to update their individual equalities profile on Oracle**. The Council should also considering **updating the categories it uses when collecting data** from Brent residents to specifically identify the Somali, Eastern European and Latin communities.
- l. The Council should **analyse the recruitment diversity statistics by pay grade** to establish if there are differences in recruitment patterns for different types of role.
- m. The Council should **set up a focus group of randomly selected new-starters to “test” their experience of our recruitment and selection processes**.
- n. The Council should have an open discussion at senior levels, and across officers and elected members, on whether to **consider setting indicative, non-binding targets for recruitment of BAME staff to senior management posts**.

## 6.2 Achieving excellence in employment policies

- a. **The Council should devise an action plan with suitable timelines for implementing the recommendations of the LGA review of employment policies**. Where recommendations are not implemented as part of this plan, a written explanation should be provided. A full list of recommendations is attached at Appendix 1.

## 6.3 Achieving excellence in employment and management practice

- a. **The Council should implement a systematic approach to learning from internal grievance and legal processes (tribunals) when complaints are raised and upheld**. The Council currently undertakes reviews following such processes, but these are undertaken within the Department involved. There should be a process for ensuring organisational learning, peer review and a process for making



improvements that goes beyond the department affected, thus avoiding inconsistent management responses and ensuring that the opportunity for organisational improvement is taken. In addition, the Council should monitor the level of internal and external processes, regardless of the outcome, in order to understand staff perceptions and respond as appropriate.

- b. The Council **should establish a more corporate approach to learning from grievances and tribunals**. This should include an annual report summarising the number of grievances and tribunals raised against the Council (all cases anonymized), breaking these down by service area and issue. The Council should similarly produce an anonymised summary of the findings of exit interviews conducted over each year.
- c. Policies are only valid if they are articulated within a clear framework and are applied in a consistent manner. Staff and manager focus groups emphasised the need for a 'one council' approach, with greater collaboration between different parts of the organisation. **The Council should ensure that it has a clear competency framework, developed in collaboration with staff**, which includes expected behaviours, in order to ensure a supportive and inclusive working culture. The framework should make specific references to celebrating our diversity, working well with a diverse range of people and managing in an inclusive manner. It should also underline the importance of the appraisal process and ensuring that all employees not only regularly see their team or service plans, but feel an integral part in their delivery. This is crucial to removing barriers to progression, and ensuring that managers demonstrate the appropriate skills and attitudes. **This framework should be developed in consultation with staff and unions and should be reflected in the Code of Conduct and reinforced through internal communications**. It should inform recruitment, progression, appraisal, conduct and capability processes.
- d. **There should be a regular (biennial) staff survey to measure staff perceptions and employee management practice**. This should be conducted independently, with the results anonymised and provided to staff. There should be a focused Council-wide action plan to respond to the findings, with each Director responsible for responding to issues specific to their areas of responsibility.
- e. **Regular focus groups should be held with different staff groups** such as BAME staff, disabled staff, women and LGBT staff. Their views should inform planning to achieve the Excellence Standard in the Equality Framework for local Government.
- f. **The Diversity Reference Group should continue to meet regularly and to assess and advise on responses to equalities data,**

**examine progress on the action plan resulting from this review and any issues raised by staff.**

- g. **Each Departmental Management Team should consider equalities issues relevant to its Department and its workforce on a quarterly basis.**
- h. **The Council should internally review its approach to bullying and harassment.** The LGA agrees that the Council's emphasis on informal resolution is good practice. However, it is important that adequate systems are in place regarding incidents which are informally resolved. Whilst respecting individual sensitivities, the Council must ensure that it can monitor trends and corporately learn lessons where appropriate.
- i. The Council should develop a policy or guidance on reasonable adjustments to **assist managers to support staff who acquire a disability** while working for Brent.
- j. **Equality of status and pay delivered via 'single status' is likely to reinforce our attractiveness as an employer, and we should continue to ensure that our practice remains consistent with our values in this regard.**
- k. Officers are asked to examine and **clarify the Council's approach to medical appointments for disabled staff** as distinct from sickness absence.

#### **6.4 Communications**

- a. **This review should be published on the staff intranet.**
- b. **The action plan produced in response to this report should be shared widely. A report of progress against that plan should be produced at six monthly intervals** and reported to the committee noted in 5a). This review of progress should also be published on the staff intranet.
- c. There should be a **review of internal communications**, ensuring that members of staff have the opportunity to engage with career opportunities, and that communication is a two-way process. It is noted that in order to be truly effective, there must be effective local implementation by managers.

#### **6.5 Member involvement**

- a. **The Council should establish a committee of elected Members to oversee progress towards the Excellence Standard in the Equalities Framework for Local Government.** This would involve both support for development and close scrutiny of the Council's

approach to equalities, including monitoring the progress of the action plan responding to the recommendations of this review.

- b. The Council Scrutiny Committee may wish to consider this review.** The production of the report of progress, referred to in 4b) above, may be an opportune moment.

**Appendices**

1. LGA Review of Policies: recommendations
2. Brent Diversity Profile