

# Royal Borough of Kingston upon Thames

## Equality Scheme 2007-2010

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## **Forward**

This document represents the Royal Borough of Kingston's Equality Scheme, a three year plan for tackling issues of Race, Disability and Gender. It incorporates the updated Race Equality Scheme (2005) and the Disability Scheme developed this year (2006). We have extended the Scheme to cover gender in anticipation of the legal requirement for 2007. We have also decided to include issues of religion, sexual orientation and age wherever possible, so that the Scheme encompasses our commitment to equality as a whole.

The Disability Scheme was developed with the help of disabled people from our community, representing a range of impairments. Details of this involvement are contained within the Scheme.

The first part of the Scheme gives an overview of the Borough, the Council and its approach to equality.

The second part of the Scheme specifically addresses the points in the legislation and outlines the manner in which the Borough will fulfil its duties.

The third part of the Scheme represents the actions each service area will take to meet these duties. It also includes actions that will be taken with regard to staffing issues.

The scheme is a 'live' document and we welcome your comments so that we can improve it year on year (see section on 'comments').

**Bruce McDonald**  
**Chief Executive**

**Derek Osbourne**  
**Leader of the Council**

## **Purpose of the Scheme**

The purpose of this Scheme is to set out the way in which the Council intends to meet its duties under the Race Relations Amendment Act 2000, the Disability Discrimination Act 2005 and the Sex Discrimination Act as amended by the Equality Act 2006. The aim is to develop measures and actions that ensure discrimination on the grounds race, disability and gender does not occur.

In addition the Scheme will consider ways of addressing discrimination on the grounds of religion, sexual orientation and age.

## **Comments on the Scheme**

We wish to ensure that the Scheme is kept up to date and therefore invite your comments.

Please send comments to:

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Copies of your comments may be made public either on the Council's web site or in future documents. If you do not wish your comments to be made public, please let us know in your response and we will keep them separate from any published comments. We may, however, be required to disclose this information to others under the Freedom of Information Act 2000.

## **1. Background**

### **1.1. The Council's aims and objectives**

The Community Plan (2004-2009), developed by bringing together key agencies in the Borough, provides the overarching vision for the Council which is to ensure that the Royal Borough of Kingston continues to be the best place to live and work in the whole of Greater London. Working together in partnership with key agencies will also ensure that the Borough will be a clean, safe and tolerant society where all of its residents can reach their full potential and can prosper. The priorities in the Community Plan form the basis of the Council's objectives:

- An Environmentally Conscious Community and a Sustainable Borough
- The Safest Borough in Greater London
- A Regional Centre for Health Care
- A Learning Community
- A Diversified and Balanced Economy
- A Regional Tourist, Entertainment and Cultural Centre
- Well-Maintained, Sustainable Housing
- A Sustainable Transport System that is Accessible to All

Within this overall framework the Council has developed six Strategic Aims:

1. Caring for the Environment
2. Putting People First
3. Enhancing Quality of Life
4. Investing in Children and Young People
5. Working in Partnership
6. Delivering Improvement

The Council has five directorates delivering the services and functions listed above. The six Strategic Aims are implemented through these directorates:

- Chief Executive's Office
- Community Services
- Learning and Children's Services
- Environmental Services
- Finance

### **1.2. The Borough Profile**

The Royal Borough of Kingston is known for its many green spaces and spectacular riverside. The population is nearly 150, 000. Over 30% of the Borough is metropolitan open land or green belt. Although the Borough is relatively prosperous it has a largely low-wage economy. Over 50% of our residents work in the Borough. Kingston is a centre for many knowledge based

small companies. As a retail centre we are second in London only to the West End. We are a creative hub and a centre of excellence for education. We have many fine schools, an excellent Further Education College and one of the Country's best new universities. The voluntary sector is strong and thriving. There are pockets of relative poverty and deprivation, largely concentrated into small areas dominated by social housing estates.

### **1.2.1. Ethnicity**

According to the 2001 Census data, 15.5% of Kingston's population is from Black and minority ethnic groups and rising to 20.6% for those under eighteen. However, the GLA estimate of Kingston's BME population in 2007 is 21% and the proportion in our schools is 40%. When you couple this with the University and College (52% and 44% of their students from BME communities) a changing picture emerges. This is higher than neighbouring Boroughs in the Southwest corner of London and higher than the national average. Kingston has the largest Korean population in Western Europe; recent estimates put this as high as 8-10,000.

Census breakdown is as follows:

White British	111810	75.52%
White Irish	3201	2.17%
White other	9381	6.36%
White & Black Caribbean	591	0.40%
White & Black African	392	0.26%
White & Asian	1398	0.94%
Other Mixed Race	976	0.66%
Indian	5322	3.61%
Pakistani	1916	1.30%
Bangladeshi	384	0.26%
Other Asian	3844	2.61%
British Black Caribbean	772	0.52%
British Black African	1406	0.95%
British Black Other	130	0.08%
Chinese	2026	1.37%
Chinese other	3723	2.52%

Recent work on race has included developing Chinese Older People's Group, a Day Service for Korean Elders, Iraqi and Iranian support groups, health promotion sessions in the Asian day centre and we provide 122 translators for 44 languages.

### **1.2.2. Disability**

Approximately 20% of people in the Borough are disabled. National statistics show that disabled people do less well than non-disabled people in many areas of life. This includes employment, income and education. They are more likely to face discrimination in accessing services.

Recent research by the government into local authorities and disability ('Able Authorities' DCLG 2006) showed that for many authorities disabled people are not seen as equal citizens but rather citizens with special needs. In some cases they are seen as a burden and not an asset. There was, in the research, little evidence that authorities think about disability when planning services except in cases where those services were specific to disabled people. Some work existed on physical changes to the environment but very little on changes to the culture or corporate approach. This is something Kingston is committed to changing.

In 1998 the Council developed a policy and an action plan on disability (the Disability Equality Policy 1998). Its aim was to 'encourage a unified and proactive approach to disability equality issues across the Council and within the Borough and to make sure that disabled people have equality of opportunity with non-disabled people so that they can lead a full and active life with equal rights, opportunities and responsibilities'. A disability equality group was formed to support and oversee the action plan. This group was disbanded in 2006 when a new inter-agency forum was established (see below).

### **1.2.3. Gender**

The gender breakdown in Kingston is 51% women and 49% men. From national statistics we know that women on average earn 17% less than men for full time work. The gap is greater if it includes part-time workers, where the difference in the average hourly wage between men and women is nearly 40%. This is largely because women work in low paid jobs. In education girls outperform boys at GCSE. One in four women experience domestic violence at some point in their lives. Transsexual people encounter difficulties particularly in privacy and dignity matters.

74.9% of women in Kingston are economically active which is slightly higher than Greater London (67.6%) but broadly in line with the UK as a whole (73.5%)

The Council has for some time taken action on women's issues particularly in relation to domestic violence, but also with initiatives such as 'Women on Wheels'.

The total number of people that provide unpaid care in the Borough is 12,345. The total number of lone parent households is 3,127 (around 5% of the total number of households). The majority of these are women.

Women councillors make up 25% of the Council. This is lower than the average for other London boroughs (30%). However, the Council does have a 'Dependants Allowance Scheme' to provide care for children under 14 and elderly or disabled relatives who live with them. This should encourage more women to stand for election.

#### **1.2.4. Religion (Census 2001 data)**

The majority population are Christian (64.6%), 3.9% are Muslim, 3.6% Hindu, 0.8% Buddhist and 0.6% Sikh.

### **1.3. What is an Equality Scheme?**

An equality scheme is a plan which outlines an authority's action over three years, aiming at addressing aspects of the 'General Duty', placed on public authorities, as outlined in equality legislation. The General Duty is a positive duty that builds equality into the beginning of the process of policy making rather than make adjustments at the end of the process. It represents a change from a legal framework where the onus is on the individual to bring a complaint of discrimination to one where the onus is on the public sector to seek out actual or potential discrimination and address it.

#### **Race Relations Amendment Act 2000: Race General Duty**

The Council has a statutory duty to promote race equality by having due regard to the need to:

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

#### **Disability Discrimination Act 2005: Disability General Duty**

The Council has a statutory duty to carry out its functions with due regard to the need to:

- Promote equality of opportunity between disabled people and other people
- Eliminate discrimination that is unlawful under the Disability Discrimination Act
- Eliminate harassment of disabled people that is related to their disability
- Promote positive attitudes towards disabled people
- Encourage participation by disabled people in public life
- Take steps to meet disabled peoples needs, even if this requires more favourable treatment.

The Disability Rights Commission (DRC) guidance *'The Disability Duty: Guidance on Gathering and Analysing Evidence to Inform Action'* advises that work on disability should follow the 'social model' of disability as opposed to the 'medical model'. The key difference between the two is in the 'location' of the problem. According to the medical model disabled people are unable to participate in society as a direct result of their impairment. According to the social model people with impairments are disabled by physical, social, cultural and corporate barriers. Disabled people generally have the same needs and

aspirations as non-disabled people, expecting to be able to access services independently. It is society and the environment that disables people with impairments. In the Disability Equality Policy 1998 the Council formally adopted a social model approach to disability, but this approach still needs embedding throughout the organisation. This will be addressed particularly through training to be provided to all frontline staff and by briefing for many other staff in the organisation.

The General Duty aims to understand and dismantle the barriers faced by disabled people according to the social model of disability.

### **Sex Discrimination Act as amended by the Equality Act 2006: Gender General Duty**

The Council has a statutory duty to give due regard to the need to:

- Eliminate unlawful sex discrimination and harassment.
- Promote equality of opportunity between women and men.

In addition to each General Duty, there are specific duties which outline the manner in which the General Duty is to be implemented. All the specific duties have informed the structure of this Equality Scheme.

The duties apply to services, employment, policy development, procurement, performance management, organisational design and delivery, and any other departmental activity that is not explicitly exempt from the Acts.

In addition to addressing the General Duties as outlined above, the Council will progress action on **Religion, Sexual Orientation and Age**. Although there is no General Duty in legislation covering these strands, there is a need to address discrimination and current legislation covers employment and service delivery (except for age, where only employment is covered by existing legislation).

Action relevant to each strand is highlighted in the action plan.

### **1.4. The Equality Standard for Local Government**

The Council has adopted the Equality Standard for Local Government. This is not a legal requirement but provides a framework for continuous improvement in equality. The Standard covers race, gender, disability, sexual orientation, religion and age. There are five levels of achievement:

- Level 1: A commitment to a comprehensive Equality Policy
- Level 2: Assessment and consultation
- Level 3: Setting equality objectives and targets
- Level 4: Using information systems and monitoring against equality targets
- Level 5: Achieving and reviewing outcomes

Each level covers employment and service delivery. The Council has already achieved level 3 and hopes to achieve level 4 by the end of 2008.

The Council has set up a group to oversee and push forward the work on the Standard. This group, the 'Equality Standard Steering Group' (ESSG) is made up of representatives from each directorate.

### **1.5. The Council's Commitment to Equality**

A key objective for the Council is to 'be a Council which celebrates diversity and practices equality in everything we do, in providing or commissioning services and as an employer'.

The Council has a comprehensive equal opportunities policy '*Putting People First*'. (**Appendix 1**). Our commitment to equality in our service delivery and our employment practices means that we believe in:

- Providing fairness and equality of opportunity
- Recognising that everyone is different and that these differences must be equally respected
- Challenging discrimination so that we demonstrate our commitments to equality and do not exclude people or make them feel isolated
- Respecting people's difference in viewpoint and ensuring that everyone has the opportunity to raise their point of view

The principle behind the approach is that 'services offered should be relevant to the needs of the local community, reflecting (where appropriate) the diversity of its religious and cultural heritage, advertised in a readily understandable format avoiding jargon and wherever possible developed in partnership with local people. Services will be provided on the basis of fairness and openness. No one will receive less favourable treatment because of their race, nationality, colour, ethnic or national origin, religious belief, sex, marital status, sexual orientation, age or disability'.

A similar set of principles are in place with the Council as employer: 'all employees will be recruited, trained and promoted on the basis of ability, the requirements of the job and similar relevant and objective criteria. No employee or job applicant should receive less favourable treatment on the grounds of race, nationality, colour, ethnic or national origin, sex, marital status, sexual orientation, religious belief, age or disability in any matters to do with employment'.

The Council has produced documents to help officers ensure that equality becomes integral to the work of each directorate. For example the Team Planning guidance includes requirements for team plans to include equality and

plan initiatives required by the Race Relations Act and the Disability Discrimination Act.

## **1.6. Structures for Equality Work**

The Leader of the Council is the lead member for equality work. The Leader has a thorough understanding of race, disability and gender issues. He acts as champion on all equality issues. The Council has an Equal Opportunities Forum which brings together representatives from directorates, staff side and the voluntary sector. It is chaired by the Chief Executive. Its function is to advise on policy and promote good practice. It reports regularly to the Corporate Development Team (CDT) and the Executive.

Reporting to the Equal Opportunities Forum and CDT, the Equality Standard Steering Group is made up of representatives from each directorate. As well as overseeing the progress towards levels of the Equality Standard, this group steers all equality work through the Council. Each directorate has an equality sub group which drives the work done in the directorates.

In early 2006, Kingston Council set up 'Kingston Disabled and Older People's Forum' which seeks to offer a different, more flexible way for local disabled people (including older people who have impairments resulting from conditions associated with old age) to be involved in shaping services. The Forum is run in partnership Kingston Primary Care Trust and Kingston Hospital Trust.

The Forum is based on the following fundamental principles:

- Involvement is based on an understanding of the social model of disability.
- Older and disabled people are offered maximum choice in the way they get involved. In particular, over-reliance on attending events disenfranchises a large number of older and disabled residents who are unable to travel.
- Each member of the forum is able to determine their preferred method of communication – e.g. correspondence, email, phone, website, focus group events.
- Material is made available in alternative formats, including audiotape and large print. A record is kept of members' communication needs and information is sent in their preferred format each time.
- Residents are kept informed about what happens to what they have said by means of a regular newsletter.
- Attempts are made to ensure that issues are presented in a way that people can relate to, not in Council 'jargon' or by means of long documents.

A Black and Ethnic Minorities Forum has been set up to inform, challenge, check and support the Council's equality initiatives in order to improve its commitment and effectiveness in carrying out its functions. The Forum acts to inform and

influence decision making, to increase trust and confidence in the communities and work towards integration of all communities in the Borough.

There are other forums available for consultation as follows:

Young People's Forum

Learning Disability Parliament

Consultation event with Deaf BSL users (February 2006)

BME Staff Group

Disabled Staff Group

Lesbian Gay Bisexual and Transgender (LGBT) Forum

Domestic Violence Forum

Domestic Violence Survivors' Group

## 1.7. Responsibility for this Scheme

The Leader of the Council has overall responsibility for the Scheme. The Chief Executive and Directors have the management responsibility for ensuring that the Scheme is implemented across the Council. The Equal Opportunities Forum will scrutinise progress on the Scheme, advise on policy and promote good practice. Regular reports will be made to CDT and an annual report will be submitted to the Executive.

## 1.8. Involvement of disabled people in developing the Equality Scheme

Early in 2006 the Disabled and Older People's Forum was publicised in the Council's magazine *Living in Kingston* and in a number of voluntary sector newsletters, including that of Kingston Centre for Independent Living and the Talking Newspaper for local visually impaired people. When disabled people contacted the Council to express their willingness to be involved, they were given the opportunity to say if they had any concerns or complaints about Council services, which were recorded.

A focus event for the Forum was held on 30 June 2006. All those who had registered their interest in the Forum were invited, as well as more than 20 voluntary sector organisations (**see Appendix 2**), and posters were displayed around the Borough to encourage others to become involved. Forum members were given the opportunity to comment on all aspects of Council (and health) services. This ensures that the Action Plans reflect the real priorities of local disabled people.

After the event, those disabled and older people who were not able to attend were contacted by letter, email or phone, according to their preference, and asked to give their views on the accessibility of local Council and health services.

The comments obtained by the various methods stated above were then added to outstanding recommendations made by the Residents Services Overview Panel scrutiny exercise into cross-cutting services for disabled people, which reported in the summer of 2005, and to outstanding actions arising from equality impact assessments carried out on Council policies and services.

To ascertain the views of disabled people in relation to employment, the Council's Disabled Staff Group was invited to comment on the Council's performance as an employer of disabled staff.

Examples of what disabled residents and staff said about our current performance in the area of disability equality are at **Appendix 3**.

A report was drawn up on the basis of information collected. This explained how services and employment procedures were disadvantaging disabled people and was sent to senior managers and heads of service. Meetings were then held with managers to draw up action plans to improve the way the Council meets the

needs of disabled people in the way it provides services and as an employer or prospective employer.

In addition, information on HIV/AIDS has been gathered following consultation with some of the people supporting those living with HIV/AIDS. This focussed on care managers in Community Services and on an organisation representing Black Africans living with HIV/AIDS. Although Kingston has a relatively small number of people living with HIV/AIDS compared with other London Boroughs, the views of those consulted have been incorporated into this Scheme and its action plan.

### **1.9. Involvement of women and transgender people**

Women represented on the Equal Opportunities Forum, the Disabled and Older People's Forum and on the Black and Ethnic Minority Forum will be consulted on the new version of the Scheme. In addition, the Scheme and its Action Plan will be sent to the LGBT Forum and the two Domestic Violence Forums. The Scheme will be amended in the light of this further round of consultation.

### **1.10. Review of the Scheme**

The Scheme will be reviewed on a regular basis by ESSG and regular reports on progress will be presented to the Equal Opportunities Forum and CDT. Progress reports will be published on the Kingston website.

## **2. Meeting the General Duty**

### **2.1. Conducting Equality Impact Assessments (EQIA)**

The Council has undertaken a screening of all its policies to see which ones were likely to have any disproportionate impact in terms of race, disability or gender. This 'relevance' test has enabled the Council to prioritise those policies which were highly relevant and conduct full impact assessments on these. Full impact assessments will be published on the website. The Council has developed guidance on conducting Equality Impact Assessments which is available to all staff on the intranet. In conducting assessments the Council will consider the full range of disabilities.

Kingston Disabled and Older People's Forum and the new BME Forum will act as reference groups for those undertaking EQIAs.

## **2.2. Access to information**

The Council has published a 'Style Guide' to encourage staff to provide information in plain English, using font size 12. Information can be provided in Braille, large print or on tape on request. The Council has a user friendly website. The main meeting rooms in the Guildhall are fitted with induction loop systems but many reception desks are not equipped with loop systems and this is being addressed through the action plans.

The Council has a translation and interpretation service –'Kingston Interpreting Service'. This covers all the community languages used in the Borough as well as British Sign Language, Braille and audiotape. Responsibility for provision of information in different formats and languages rests with the originator of the information, who can commission translation or interpretation from Kingston Interpreting Service. The service is also commissioned by local health providers.

## **2.3. Monitoring for equality**

The Council has produced monitoring guidelines. These cover ethnicity, gender, disability and advice on monitoring by religion, sexual orientation and age. The guidelines are aimed at all Council staff who need to monitor their services or employment practices or who are conducting EQIAs. The Guidelines include the current statistics for the Borough and advice on which questions to ask and what information to collect when conducting monitoring exercises.

The Council already monitors employment (see below) and many of its services. Employment monitoring information is reported to CDT and the Equal Opportunities Forum on a six monthly basis and reported to the Executive (formerly Community Leadership and Resources Overview Panel) on an annual basis. Employment monitoring information in relation to BME staff is published on the Council's website annually and plans are in place to extend this to cover disability and gender. Progress on monitoring is overseen by ESSG.

## **2.4. Consultation guidelines**

During 2006 the Council produced detailed consultation guidelines. These include methods of consultation which are most appropriate for different target groups, lists of contacts in the Borough and advice on analysing and using the outcomes. The guidelines specifically refer to the use of consultation in undertaking EQIAs and the Council is putting in place a system for cross referencing all consultative information used by the Council. This can then be used in undertaking EQIAs. Information resulting from these assessments will also be made available across the Council.

The consultation guidelines are available on the Council's website.

## **2.5. Harassment and bullying**

2.5.1. The Council works in partnership with many agencies within the Borough's Crime and Disorder Reduction Partnership. The Partnership provides an action plan annually which incorporates issues concerning all aspects of Hate Crime, which have included the setting up of a Domestic Violence One Stop Shop, Racial Incidents One Stop Shop as well as Third Party Reporting sites. There is an overarching Hate Crime Policy Group comprising of strategic managers from the main statutory agencies as well as representatives from relevant voluntary organisations. For operational issues there are three Forums, Domestic Violence, Racial Incidents and LGBT who report to the Hate Crime Policy Group who in turn reports to the Crime & Disorder Reduction Partnership.

The Council has a number of written procedures dealing with the issue of harassment either for staff or service users as follows:

- Violence at Work – used when an officer is abused, threatened or assaulted by a member of the public whilst carrying out their duties. It refers to harassment with 3 categories, racial, sexual and disability.
- Hate Crime Harassment Policy – for use by officers when an incident is reported to them by a client/tenant/pupil and perpetrated by someone other than an officer of the council.
- Housing Services has both Anti Social Behaviour and Racial Harassment Policies.

2.5.2. Employment: Harassment and bullying among staff is dealt with under the Dignity at Work policy. The policy expressly refers to ethnicity, gender, disability, religious belief and sexual orientation.

## **2.6. Publication**

The Council publishes its Equality Scheme on its website. This Scheme will also be available in different formats on request. Equality Impact Assessments are to be posted on the website by the end of the year. The outcome of assessments are also added to Council reports which are public documents. A yearly update of the Scheme's action plan will be reported to the Executive and made public.

## **2.7. Training**

The Council has run training in undertaking equality impact assessments for policy officers and for managers. Mandatory generic equality training is being delivered to all front line staff. RBK also currently runs regular training sessions on race, disability and age equality. There is also an equalities slot on the Induction course that all new staff attend. All new staff receive a copy of the

Council's Equal Opportunities Policy – 'putting People First'. Elected members receive training on their role in relation to the Equality Standard for Local Government and equality legislation.

## **2.8. Employment**

### ***2.8.1 Recruitment, selection and promotion***

The Council monitors staff by ethnicity, gender, disability and age (see staffing breakdown in **Appendix 4**). This covers current workforce profile and recruitment and selection. The Council monitors applicants for jobs, training, promotion, cases managed under the disciplinary, capability and grievance procedure, and leavers by race. (**See Appendix 5**). We will be extending this monitoring to include gender and disability in 2007. We also undertake monitoring of elected members by gender, age and race. These figures are published annually and reported to the Equal Opportunities Forum, the Corporate Development Team and the Executive.

The figures are analysed and action is taken where there is evidence of disproportionality. Targets are set in the HR section of the action plan appended to this Scheme. The Council plans to start monitoring by religion, sexual orientation, starting with the monitoring of complaints of harassment and bullying.

The Council undertakes a Staff Survey every two years. This too is monitored by ethnicity, gender, disability, age, sexual orientation and religious belief to ascertain whether any differences in experience exist within different staff groups.

### ***2.8.2 Equal Pay Review***

The Council has conducted an equal pay audit which on the whole indicated that we had equitable pay. An action plan has been developed to address some minor areas of disparity in payment. No pay gap owing to work patterns (i.e. part-time workers) was revealed.

## **2.9. Education (Learning and Children's Services)**

The Local Authority will encourage schools to develop their own Equality Schemes using the guidance from the Department for Education and Skills and the Disability Rights Commission, the Commission for Race Equality and the Equal Opportunities Commission.

The Council is guided by its Children & Young People's Plan 2006/2010 which ensures the delivery in the five key themes, Being Healthy, Staying Safe, Enjoying & Achieving, Making a Positive Contribution and Achieving Economic Wellbeing. This

Plan has been written following consultation and is embedded with action plans to ensure that monitoring is undertaken, evaluated and supported by performance indicators. Services are integrated and the Plan includes partners from both the statutory and voluntary sectors. It can be viewed at the following link:  
[http://www.kingston.gov.uk/children\\_and\\_young\\_people\\_s\\_plan.htm](http://www.kingston.gov.uk/children_and_young_people_s_plan.htm)

## **2.10. Procurement**

The Council has produced clear guidance which ensures that contractors and suppliers meet the legal requirements placed on the Council. The Ethical Procurement Policy 'Everyone Procures' has sections on equality and also on the need to ensure that contractual arrangements are accessible to small and medium sized enterprises, the voluntary sector and ethnic minority businesses. Potential contractors and suppliers are required to provide detailed information on their approach to equality and evidence that they have relevant systems in place. The guidance will be revised to include the need to consider disability in more detail.

## **2.11. Partnerships**

Where Partnerships do not have a separate legal identity and are therefore not bound by the General Duty, the Council will apply its own duties and ensure that the work of the partnership promotes race, disability and gender.

## **2.12. Complaints**

The Council has a complaints Procedure. Complaints about any service provided by the Council should be made to nominated people in each directorate. A leaflet 'Have Your Say' is available online and in reception areas with names of those who can be contacted.

The Council has a Code of Conduct in relation to staff and breaches of this code are investigated in accordance with the Council's disciplinary procedure. Complaints about employment should be made to Carol Taylor, HR Advisor.

Complaints are monitored by gender, ethnicity and disability in departments where there is close contact with the client. Plans are in place to encourage a more consistent approach to monitoring complaints across directorates.

**If you have difficulty reading this document because of a disability or because English is not your first language, we can help you. Please call our helpline on 020 8547 5757 or ask someone to call on your behalf.**