

Our Commitment

Pendle Borough Council is committed to equal opportunities both in the provision of services and as an employer. The seriousness of this commitment is reflected in the Council adopting equalities and diversity and community cohesion as key priority issues within its Strategic Plan.

These key priority issues demonstrate the Council's Equality duty under the 2010 Equality Act to have **due regard** to the need to:

- **Eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the Act;
- **Advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
- **Foster good relations** between people who share a protected characteristic and people who do not share it.

Having **due regard** means that we will consciously think about these three aims and

- Remove or minimise any disadvantages suffered by people due to their protected characteristics.
- Meet the needs of people with protected characteristics; and
- Encourage people with protected characteristics to participate in public life or other activities where participation is low.

Equality of opportunity for all sections of our community and workforce is an essential value for this Council. This means recognising the inequalities which people suffer and taking action to reduce them. Everyone has a role to play in ensuring fairness towards colleagues and the community we serve.

This commitment is an integral part of the provision of any service and the employment conditions of each and every member of staff. We expect all our staff to promote equality in the workplace and in the services we deliver.

Equal opportunities mean access to jobs, services, information and participation for everyone. The Council recognises that because some groups of people experience prejudice and discrimination to make opportunities really available we have to make an extra effort.

The Council's commitment is to a fair deal for all and a recognition of the difficulties and inequalities which certain groups continue to face. The Council is committed to promoting community cohesion and social inclusion in order to provide services that improve the quality of life and life chances of local people and communities.

Pendle Borough Council exists to represent and provide services for all people of the Borough. Our equal opportunities policy requires that the Council recognises and respects cultural and religious diversity and serves all sections of our local communities. Everyone has a right to know what is available and to access services from the Council.

Access to services will be based on need or entitlement. The Council will be open in its approach and make sure that we take account of the views and experience of our diverse community. The varied needs, expectations and culture of local people will be reflected in the range, sensitivity and relevance of our services.

The Council is committed to developing new and innovative ways of promoting and achieving equality of opportunities and outcomes in collaboration with all its partners, and especially through the Vision Board.

What Does Our Equal Opportunities Policy Mean in Practice?

Friendly, responsive and accessible services

Pendle Borough Council services need to be welcoming to all and be able to understand and respond to a variety of needs and requirements. This means being prepared to adapt and change what we provide.

Services based on need

To make sure we have got it right, we need to know what the needs or requirements of different groups are. This means knowing about population trends and the numbers of the relevant groups for our services. It also means knowing the composition of the different age groups by gender, race and disability, sexual orientation and religious belief and understanding and appreciating the diversity of needs within our communities. It is vital to know the make-up of the relevant target population so we can assess whether services are reaching all sections. This includes knowing about deprivation and income levels in the district so that those most in need are receiving vital services and benefits.

Services for all

Our equal opportunities policy is designed to lead to better services which are sensitive to the variety of needs and requirements in our local communities.

We are committed to providing the best possible services for everyone. This isn't about treating people equally – it's about meeting every different customer's needs in the best way. Knowing about and taking into account the diversity in our communities helps us to recognise different needs and to deliver our services accordingly. For example, we may wish to promote women-only facilities with some activities for black and ethnic minority women in particular. We will encourage all sections of the community to use the Council's facilities and services.

Consulting local people

We will seek to ensure that we know people's views and experiences of our services. This requires us to check that the groups we talk to, such as voluntary organisations, tenants/residents associations are representative of a cross-section of local people. It also means making special or separate arrangements to consult various groups, using a range of methods, not just our traditional meeting format. This is in recognition that some of the established groups do not represent the different sections of the community. It is

also a recognition that public meetings may provide access for the articulate groups and could disadvantage some inarticulate groups or ethnic minority people.

Knowing who is using our services

Our policy framework includes monitoring take up of services so we can check that target groups have access and that use of Council services is in line with what we know about needs among different groups. Monitoring should not be seen as an end in itself but a means of checking how effective we are being and of then changing, adapting or targeting our services.

Equality Impact Assessments

In order to take into account the needs, experiences and circumstances of those groups who are affected by our policies and identify the real and possible inequalities that people might experience, we will undertake Impact Assessments. This will help us to improve transparency and public confidence in what we do, develop better policy making procedures and identify how services can be made more accessible and appropriate together with how they can be improved.

Information for everyone

Information to the public about services is a crucial element of the equal opportunities framework. If it is not made available in an understandable form to all, then access to services is in practice restricted to those people "in the know". There are things that we can do to make sure that we communicate well with our residents. We recognise that some people will need interpretation and translation services so we have a 'Just Ask' scheme. People can tell us if they need information in an accessible format to suit their individual needs. This can include different languages, audio tape and large print, Braille, e-text or CD-ROM. We will always try to meet individual requests in the quickest and most helpful way.

Representation

Pendle Borough Council is not just a provider of services, it is also designed to give people a say in how their local area is run. All sections of our local community need to be able to identify with the Council and feel that they will be listened to. They also need to feel that they are represented in the decision making process and have some influence on the policy makers. Our approach to consultation is also part of giving local people greater influence and empowering them.

OUR EQUAL OPPORTUNITIES POLICY

Introduction

Pendle Borough Council is committed to making sure that it provides Equality of Opportunity in how its employment and services are delivered.

Our Policy seeks to:

- Address inequality;
- Recognise and value difference;
- Promote a skilled and diverse workforce;
- Enable the Council to meet the needs of an increasingly diverse population; and
- Ensure that the Council acts in accordance with legislation.

The Council is committed to eliminating unlawful discrimination, and achieving equity and equality of opportunity as an employer and service provider. The Council is also committed to the provisions of the **Equality Act 2010** which means that we will have due regard to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. The Council's commitment to a fair deal for disadvantaged groups is in recognition of the difficulties and inequalities which these groups continue to face. Equal Opportunities means access to jobs, services, information and participation for everyone.

The Equality Act 2010 identifies a number of protected characteristics that qualify for protection under the Act. Protection from discrimination is therefore based on the following protected characteristics:

Age

Disability

Gender and gender reassignment

Race (including colour, nationality, ethnic or national origin)

Religion or Belief

Sexual orientation

Marriage and Civil Partnership

Pregnancy and Maternity

This means making sure that no person or group of people living in, working in or visiting the Borough will be directly or indirectly discriminated against because of a protected characteristic or unrelated criminal conviction. Copies of this policy are available for all members of the public from Council Offices and Reception Areas and on request by telephone or e-mail. The Policy is also able to be viewed on the Council's website (www.pendle.gov.uk)

The Council recognises that discrimination can take different forms:

a) **Direct Discrimination** (applies to all protected characteristics)

This is where a person or group of a protected characteristic is treated less favourably than others are or would be treated in the same or similar circumstances, for instance saying that only women can apply for a job.

Discrimination is lawful in certain circumstances but it must be justifiable. One justification may be for physical privacy, for instance female games attendants in female-only changing rooms.

b) **Discrimination by Association** (applies to all protected characteristics except Marriage & Civil Partnership and Pregnancy & Maternity).

This is direct discrimination or less favourable treatment against someone because they associate with another person who has a protected characteristic. For example, the parent of a disabled child.

c) **Perception Discrimination** (applies to all protected characteristics except Marriage & Civil Partnership and Pregnancy & Maternity).

This is direct discrimination or less favourable treatment against an employee because others think they possess a particular protected characteristic. It applies even if that person does not actually possess that characteristic. For example, a person who is perceived to be gay who is not.

d) **Indirect Discrimination** (applies to all protected characteristics except Pregnancy & Maternity)

Indirect discrimination is when a condition, rule, policy or practice is applied to everyone but it particularly disadvantages employees with a protected characteristic. This can be justified if you can show that you acted reasonably and that it is a proportionate means of achieving a legitimate aim.

An example of indirect discrimination is requiring refuse collectors to have a level of physical strength in excess of that needed by the job so that it would be possible that more men than women would be able to meet this criterion. However, it is acceptable to have specific criteria such as the requirement to have good eye sight for a driver's job or the ability to climb step ladders for a caretaker's job.

e) **Harassment** (applies to all protected characteristics except Marriage & Civil Partnership and Pregnancy & Maternity)

Harassment is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating an employee's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It may also involve unwanted conduct of a sexual nature or be related to gender reassignment or sex. Employees can complain of behaviour they find offensive, even if it is not directed at them and the complainant need not possess the relevant characteristic themselves. Employees are also protected from harassment because of perception or association.

- f) **Third Party Harassment** (applies to all protected characteristics except Marriage & Civil Partnership and Pregnancy & Maternity)

An employer may be liable for harassment of their employees by people (third parties) who are not employees of the council e.g. customers or clients. The harassment must have occurred on at least two previous occasions (but not necessarily by the same third party). The employer must be aware it has taken place and not have taken reasonable steps to prevent it from happening again.

- g) **Victimisation** (applies to all protected characteristics)

Discrimination by victimisation is unlawful. It occurs when an employee is treated badly or supported a complaint or raised a grievance about an issue covered by the Equality Act. This means for example that a non-disabled person can also be victimised, for instance if they are a witness or support a disabled person in their discrimination claim.

- h) **Discrimination arising from Disability**

It is unlawful to treat a disabled person unfavourably because of something connected with their disability e.g. a tendency to make more spelling mistakes arising from dyslexia. This type of discrimination is unlawful where the employer, or person acting for the employer knows, or could reasonably be expected to know, that the person has a disability. This type of discrimination is only justifiable if an employer can show that it is a proportionate means of achieving a legitimate aim.

Managing, Monitoring and reviewing the policy

The Council, through its Executive, Overview and Scrutiny committees and Corporate Equality Officer Group, will monitor and review:

- this Policy and its effectiveness
- the equalities actions identified within the Corporate Plan
- the equalities actions identified within Annual Service Plans
- the implications of current and proposed legislation.
- Organisational commitment through use of the Equality Framework.

SERVICE DELIVERY

Introduction

As a provider of services to the whole community of Pendle, the Council believes that it should take action to make sure that the needs of all sectors of the community are identified and that steps should be taken to eliminate any discrimination in how its services are delivered. By this the Council means that:

(a) There will be CONSULTATION with the community to find out the needs of different groups of people, especially those from vulnerable and marginalised groups to ensure their views are taken account of. This will be done through Service users, voluntary and community organisations, Citizen's Panel, focus groups, representative organisations, through the Equality Impact Assessment process and through individual comments by elected members and staff. Consultation will be carried out at a corporate level, and by individual service areas in line with the framework set by the Council's Consultation Strategy. Following consultations we will feedback the relevant information to the consultees.

(b) The STRATEGIC PLAN and annual SERVICE PLANS will include a programme of work to improve the delivery of services for the whole community. The Corporate Equalities Steering Group will consider any equalities issues which have corporate impact and make recommendations to Council for approval. These corporate plans will also include actions required by the Human Rights Act. They will report back to the Management Team on progress against agreed equalities actions.

Service Managers will be responsible for ensuring that their annual Service Plan includes actions to improve the delivery of their service in order to meet the identified needs of the whole community. When each Service Manager reports on progress against their Service Plan they will be expected to identify progress on identified equal opportunities issues

(c) MONITORING - Each service area will establish an appropriate system for monitoring performance in delivering their service to the whole community. This will enable services and the Council as a whole, to assess the success of the identified actions and the Equal Opportunities Policy and will inform future actions. The results of the monitoring will form part of an annual report to the Overview and Scrutiny Management Committee and Council.

(d) RESPONSIVE SERVICES AND CUSTOMER CARE – The Council will ensure that structures are in place to embed equality outcomes in service targets and objectives. Customer Care policies will identify the needs of vulnerable and marginalised groups and ensures that complaints are dealt with properly. Training in Human Rights considerations will be provided to ensure that these considerations are reflected in Service Plans.

This policy is designed to improve Pendle Borough Council's service delivery by promoting initiatives, which ensure that our customers receive services in a way that suits them, and their particular circumstances.

This commits the Council to make sure that all its policies, service plans, practices and procedures reflect and incorporate its equalities objectives with:

- a workforce informed and committed to the objectives of this Policy
- an organisational structure that ensures effective management and implementation of the policy
- involvement of service users in guiding provision and decision making
- being responsive to the needs and concerns of the community when planning and delivering services.

In formulating this policy the Council recognises and accepts that discrimination exists and that some members of the community are unjustifiably denied equal access to services.

By adopting this policy the Council seeks to ensure equality of access to services. Equality, along with quality, are core values which underpin service provision throughout the Council.

The Council will take any necessary action to discharge its legal obligations to ensure the elimination of unjustified discrimination. Action will be taken to ensure that fair access is at the heart of all service provision. This will be achieved by ensuring that all policies, service plans, practices and procedures reflect and incorporate the values stated in this Policy.

Promoting equalities through partnership

The Council will promote good equalities practice:

- as a key facet of the Council's community leadership role
- as a purchaser of goods and services
- within partnership arrangements
- by completing Equality Impact Assessments that involve community and/or stakeholder groups and which are made public
- through its representatives in outside organisations
- by the grants it gives to voluntary organisations
- through its ability to help form and guide opinion
- through its statutory powers and responsibilities

Detailed actions relating to these will be contained in service plans.

Promoting equalities through consultation

Consultation is the key to achieving equality of opportunity in service provision. The Council will ensure that by using a variety of appropriate consultation methods it will properly represent the needs and requirements of different disadvantaged groups. Through consultation we will demonstrate:

- Improved services

- Improved outcomes
- An improvement in the perception of disadvantaged groups
- That experiences highlighted through consultation have been analysed and acted on.

Promoting equalities through training

Appropriate training for elected members, employees and others directly involved in the provision of Council services will be provided to ensure implementation of the Council's commitment to equalities.

Implementation of the Policy

Each service area of the Council will carry out a self-assessment of the specific services it provides. Each service area will include within their annual Service Plan an equalities action plan with specific targets and performance indicators aimed at reducing potential barriers to fair access.

Responsibility for policy and implementation

The elected members of the Council are ultimately responsible for delivering services that meet the diverse needs of the Pendle community. Directors and Service Managers are responsible for the delivery of services. Sensitive service delivery will be achieved through well-trained and motivated staff who are responsible for their own behaviour. All staff are expected to be sensitive to the diverse needs of the community in Pendle.

Introduction

Pendle Borough Council has both social and legal responsibility for ensuring that it provides equality of opportunity and freedom from discrimination for all existing and potential employees regardless of:

- Race, ethnicity or national origin
- Disability
- Age
- Sexual orientation
- Religion or belief
- Gender and Gender reassignment
- Pregnancy and maternity
- Marriage and Civil Partnership

The Council considers that the provision of equality of opportunity and freedom from discrimination are central to the health and wellbeing of its workforce. It is, therefore, committed to dealing effectively with any proven act of discrimination, abuse, harassment, bullying or hate incident committed either by staff or service users. The Council also considers that this provision is essential to the operation of effective services. It therefore requires that staff treat each other and members of the public with dignity, courtesy and respect at all times, ensuring that they adhere to the Council's policies and procedures designed to promote equality of opportunity and anti-discriminatory practice in the workplace.

Quality and equality in service delivery and employment are closely linked to promote equity and social justice for all our communities. By trying to ensure that the workforce is representative of the people it serves, the Council aims to ensure that those who deliver services, or who make decisions about services, implement non-discriminatory policies, procedures and practice to meeting the needs of the whole community. Systematic recruitment and workforce monitoring will be used annually to review the Council's position as an Equal Opportunity Employer and develop appropriate Action Plans to address any gaps arising out of the monitoring.

It is a condition of service that all employees follow the Council's Equal Opportunities Policy. All staff will be given a copy of this Equal Opportunities Policy and the meaning of the policy will be made clear to new members of staff as part of their induction programme. We expect all our staff to promote equality in the workplace and in the services we deliver. If any member of staff fails to adhere to the policy, disciplinary procedures could be set in motion that ultimately may result in dismissal.

As well as accepting its responsibilities under current legislation, the Council is committed to broad principles of social justice. It confirms that equality extends into all of the services it provides as well as in its employment policies and practices. It recognises that people are discriminated against and disadvantaged in employment, and that passive policies will not reverse this discrimination and disadvantage. The Council will take steps to ensure equality of opportunity in employment through positive action initiatives.

The framework

In adopting a best practice approach, the Council fully recognises that its employment practices are a major influence on the community at large and intends that its equalities policies should reach out into the community it serves.

The policy applies to potential as well as actual employees and relates to all aspects of employment, including recruitment, pay, terms and conditions of services, promotion, development and training, transfer, grievance and disciplinary procedures and in making arrangements for working in the Council. The policy will be available on request to all applicants for jobs.

All sections of the population will have equal access to jobs offered by the Council and no applicant or employee will receive less favourable treatment because of gender, disability, age, race, ethnicity or national origin, marriage or civil partnership, pregnancy and maternity status, religion or belief, sexuality, gender reassignment, trade union activity, unrelated criminal convictions or responsibility for dependants unless an Occupational Requirement applies. Where necessary, reasonable adjustments will be made to enable disabled applicants to overcome disadvantages in the recruitment process. Similarly, reasonable adjustments will be made for existing employees to enable them to continue working.

In order to combat indirect discrimination, no unnecessary conditions, rules, policies or practices will be applied to any Council job, which would have a disproportionately adverse effect on any one group.

In implementing this policy the Council recognises the different and special needs of the following groups of people who may experience discrimination and be disadvantaged in society. These groups are defined in the Equality Act 2010 as possessing protected characteristics.

Gender and Gender Reassignment

The Council is opposed to discrimination on the basis of gender and recognises that social and economic structures deprive women of opportunities to realise their full potential. The policy aims to improve the opportunities available to women. Women and men will be encouraged to apply for all jobs unless there are genuine occupational requirements which restrict a job to one gender as defined by law. Opportunities for career counselling will be introduced and where either gender is under-represented the Council will provide encouragement to the under-represented gender to apply for such jobs. It will also create more equal access by providing personal development opportunities to equip potential candidates with the skills to apply for those jobs.

The Council confirms that its employment practices are designed to support women and men who have responsibilities for children and dependants whilst ensuring an effective and efficient workforce. Flexible working systems will be promoted to support people with responsibility for dependants.

The Council will take necessary measures to prevent discrimination against employees or potential employees on grounds of gender reassignment. We will ensure that someone who proposes to, starts or has completed a process to change his or her gender is protected. Since 2005 transsexual people have been able to change their legal gender by allowing them to acquire a new birth certificate and they can apply for a Gender Recognition Certificate.

Employees undergoing gender reassignment treatment who require time off work for medical or surgical procedures will be treated as all other employees regarding the Council's sickness procedures. Human Resources procedures will take into account through developed procedures, the relevant amendments required to records and systems.

Disabled people

The Council is opposed to discrimination on grounds of disability.

Disabled applicants will not be barred from selection on grounds of their disability nor will disability in itself be acceptable as a reason for dismissal from any Council job. The Council will take reasonable steps to provide and adapt premises, facilities, or equipment wherever possible to meet the needs of disabled people.

Positive steps will be taken to attract disabled people to Council jobs through the efficient operation of the "two ticks" scheme and other Council initiatives.

The Council will take steps to eradicate any oppressive attitudes towards disabled people among its workforce and will run training courses to this end.

Race

The Council recognises that Britain is a multi-racial, multi-cultural society with a diversity of cultures, religions and beliefs represented in its population. This is particularly true of the Borough of Pendle.

The Council will not tolerate any form of racism, defined as "conduct or words or practices which disadvantage or advantage people because of their colour, culture or ethnic origin." Steps will be taken to eradicate all forms of unwitting prejudice, and racist stereotyping within the structures of the organisation, and in its processes, policies or practices.

Incidents of racial harassment including verbal or physical abuse or attack against colleagues or members of the public will be dealt with under the grievance and disciplinary procedures.

Within this policy, a racist incident is defined as “any incident, which is perceived to be racist by the victim or any other person.”

Age

The Council recognises that inaccurate assumptions based on prejudice and stereotypes are often made about the abilities and characteristics of younger or older people, which adversely affect them. It acknowledges that discrimination against people exists because they are “too old or too young.” Action will be taken to combat this discrimination and to afford equality of opportunity for older and younger people. The Council is committed to the removal of all age discrimination for and in employment.

Lesbian, gay and bisexual people

The Council recognise that lesbian, gay and bisexual people experience very different forms of oppression. A person’s sexuality is not a matter which the Council will take into account in determining suitability for recruitment, promotion, training or transfer for any post and will not be grounds for dismissal from any Council job.

Harassment, whether physical or verbal, of lesbian, gay or bisexual people and their children, by members of the public or colleagues will not be tolerated. The Council is committed to maintaining grievance, disciplinary and other codes of practice to deal effectively with any incident that may occur. Information and training to increase awareness and support for the policy relating to lesbian, gay and bisexual employees is an essential aspect of its development.

Religion or Belief

The Council recognises that it is illegal to discriminate against people in employment or vocational training on the basis of their religion or beliefs. This includes the perception of a person’s religion or belief and a person’s association with someone of a particular religion or belief. We also acknowledge that belief can cover any religious or philosophical belief which can cover beliefs such as atheism and humanism.

Marriage and Civil Partnership

We will ensure that married employees and employees in civil partnerships are not discriminated against and that they are treated the same way in relation to recruitment, terms and conditions of employment, training, promotions and transfers, dismissals, redundancies and retirement.

Pregnancy and Maternity

The Council will ensure that a woman is protected against discrimination and victimisation from the beginning of her pregnancy until the end of her maternity leave or return to work. Any form of discrimination during a pregnancy related illness, absence during compulsory and additional maternity leave will not be tolerated. We will also provide appropriate facilities for breast feeding mothers.

Other forms of discrimination

The Council recognises that other forms of discrimination exist which have not been specifically dealt with in this policy document (e.g. dress codes, health issues, trade union activity, etc.) and commits itself to the general principle of fairness, justice and equality. It will seek to apply this principle to every area where inequality is identified.

Other Legislation which impacts on recruitment and selection

Rehabilitation of Offenders Act 1974

This Act was introduced to make sure that ex-offenders who have not reoffended for a period of time since the date of their conviction are not discriminated against when applying for jobs. The Act helps the conviction to be 'spent' and the ex-offenders to 'wipe the slate clean' of their criminal record. Unless the post they are applying for is exempted, they are not legally required to disclose to employers convictions that have become spent.

The Council will ensure that an applicant or employee is not asked to disclose any spent convictions unless they are applying for an exempted post. In addition any convictions disclosed by either the employee or in a DBS Disclosure (where applicable) will be considered fairly in terms of the relevance of the convictions to the post, the length of time since the conviction etc.

Consultation

The Council will consult with representatives of each of the groups outlined who may be subject to discrimination or disadvantage and with trade unions, to ensure that its policies and practice reflect the true needs of the groups.

Recruitment and selection

Council job requirements will be constantly reviewed to ensure that they do not discriminate directly or indirectly. The detailed procedures for promoting equality of employment in the recruitment and selection process are contained in separate documents.

The recruitment selection process is of crucial importance to the success of this policy. The process must be carried out by people who are appropriately trained and committed to the principles of the policy. The Council will ensure that any employee or elected member involved in any stage of the recruitment and selection process is thoroughly briefed and trained in the provision of this policy.

Training and career development of staff

The Council will provide resources for equalities training of all employees, giving priority to key supervisory and management decision makers, and for all those dealing directly with the public, to promote equalities and combat all forms of discrimination.

The performance development process will assist employees to identify plans for their own training and development needs. Encouragement will be given to identify career paths, which fall outside traditional stereotyped roles.

Conditions of service

It is a condition of service that all Council employees adhere to the Equal Opportunities Policy. All service conditions will be reviewed, in consultation with trade unions, to ensure that they adequately provide for the needs of employees in the groups outlined in this policy.

Acts against colleagues or members of the public, whether verbal or physical, which after investigation prove to be discriminatory, are acts of misconduct which will lead to disciplinary action. This includes inappropriate comments, images etc contained in electronic communications such as email or made on social networking sites.

The mode of dress and presentation of Council employees will be restricted only on the grounds of health and safety, decency, security and suitability or where the Council provides an appropriate form of clothing or allowance for an appropriate form of clothing.

Display of materials offensive to groups covered by this Policy will be regarded as a disciplinary offence.

Organisational arrangements

The Strategic Director in conjunction with the Human Resources Manager will be responsible for ensuring the implementation and monitoring of the effectiveness of the policy. Although it is the responsibility of each Manager to actively promote equality of opportunity, the policy must be made to work by all employees in all service areas. Everyone has a legal duty not to discriminate.

Monitoring

The effectiveness of the policy can only be judged by using information about how it is operating. The Council will use a monitoring system to collect data and allow assessment to be made by the Council, trade unions and the groups covered by the policy on the progress made in putting the policy into action.

The monitoring system will establish the extent to which ethnic minorities, women, different age groups and disabled people are represented in occupational and salary/wage grouping and training and management development activities. The Council will develop ways of monitoring the effectiveness of its policies towards transgender, lesbians, gay and bisexual people in discussion with representatives of these groups.

The monitoring system depends on information being available, therefore, all employees and job applicants will be asked to provide information on their, age, gender, ethnic origin, sexuality and religion and whether they are disabled on a self-classification basis. The reasons for monitoring will be made clear to all applicants. The giving of this information will be entirely optional, but the Council will urge co-operation to assist in monitoring progress of its equalities programmes.

No information obtained as part of the monitoring of equality in employment, which may identify individuals, will be given to any organisation outside the Council unless required by law.

An annual equal opportunities in employment monitoring report will be prepared by the Human Resources Manager for consideration by Management Team, the Overview and Scrutiny Management Committee and the Council.

Comments and complaints

The Council will take seriously and will deal effectively with all complaints of discrimination on grounds of race, ethnic or national origin, disability, age, gender, marital status, sexuality, religion, maternity/pregnancy or responsibility for dependants. Anyone who makes a complaint or who gives evidence will not be victimised, treated less favourably than other employees or otherwise treated as if they are over-sensitive about discrimination.

Grievances by employees arising from this policy will be dealt with using the existing Council procedures such as the Harassment and Bullying Procedure, etc.

Nothing in the procedures for dealing with comments, complaints or grievances about breaches of the corporate equalities policy shall limit or affect the statutory rights of a complainant.

The Human Resources Manager will report to the Council annually on the number of and types of comments, complaints and grievances received and the degree to which the operation of these procedures is satisfactory.

Conclusion

This policy demonstrates Pendle Council's commitment to equalities in service delivery and employment. The Council will seek to ensure that it has the policies, practices and procedures in place that will enable it as soon as reasonably practicable to achieve the Excellent level under the Equality Framework.

This Policy is a living document and it will be kept under review and updated as necessary.