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**Equal opportunities and diversity for  
staff in higher education**

# **Cross-sectoral study**

**Project 4**

**Report to HEFCE, SHEFC, HEFCW  
by PricewaterhouseCoopers LLP**



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**Case studies (see separate file)**

- Case study one - City Co
- Case study two - Telecoms Co
- Case study three - Bank Co
- Case study four - Education Org
- Case study five - Hospital Org
- Case study six - Police Org

# 1 Executive summary

- 1.1 The purpose of this study has been to investigate good practice in embedding equality and diversity in organisations outside of the higher education (HE) sector. The aim is to consider the ways in which individuals or organisations in the HE sector can learn from these experiences. In addition to good practice this report has also sought to establish where there have been lessons learned and indeed show where the case study organisations are still very much on a journey.
- 1.2 This report is supplemented by Appendix A, which provides detailed write-ups of the six case studies. The report in its entirety has been developed as one part of a five project programme. The understanding at the time of writing this document is that on completion of all five projects the steering group will seek to integrate the findings.
- 1.3 This report has focussed on reporting the findings of the case study rather than applying those findings to higher education in the UK as this will be done when all of the projects are brought together. However the HE sector has been considered in a number of key learning points wherever possible.
- 1.4 In reflecting on the key messages and recommendations, it is clear that there is no one route to successfully mainstreaming the equality and diversity agenda. It is also evident that the selected case study organisations are on a journey and have not yet fully integrated equality and diversity into all their practices. In this executive summary we have identified what we believe are the four key considerations for most HEIs that have emerged from our research:

**Leadership** – the most important trend noted was the importance of top level commitment and the need for that to be reinforced as often as is necessary. Either the vice chancellor or a member of his/her team needs to show enthusiasm for, and dedication to, the equality and diversity agenda in a public way, through their actions backed up by regular communication with staff;

**The role of an external body** – *the HE sector is one in which institutional strategy is often driven by changes in the external environment. Therefore to mainstream equality and diversity it is important that the main public funding body takes an active role in bringing about change. This could include the requirement for vice chancellors to have a measurable objective within their key performance indicators (KPIs) in relation to equality and diversity which has to be reported on annually.*

**Accountability and ownership** – *there can be a tendency towards adopting an attitude that equality and diversity are the responsibility of an individual or a specialist unit or at best that as “liberal institutions they [HEIs] are meritocracies” and therefore these kinds of initiatives are irrelevant. In such situations it is important to find ways to change the attitudes of staff. For some institutions the most appropriate method will be through training; for other HEIs it will be more appropriate to introduce specific KPIs and targets, and for others it will include the involvement of middle and senior managers in key initiatives that relate to their area, such as impact assessments on departmental policies.*

**Communication to internal stakeholders** – *this can be particularly difficult to manage in HEIs which tend to be hierarchical organisations, and is even more difficult in multi-campus institutions. It is helpful to have a formal communications strategy and it is important to include the most appropriate form of communication based on the type of HEI. For some that will be the use of fora such as committees to spread the message, for others it will be e-bulletins, and in others it will be video messages. However, in all cases the communications need to be clear, consistent and regular.*

# 2 Introduction

## Background

- 2.1 PricewaterhouseCoopers LLP (PwC) was commissioned by the Higher Education Funding Council for England (HEFCE), supported by its counterparts in Scotland, Wales and Northern Ireland, to carry out a cross-sector comparative study to investigate how equality and diversity initiatives in other organisations within the UK have led, or failed to lead, to significant change, and to establish the lessons that could be effectively applied to higher education in the UK.
- 2.2 We spoke with representatives in six organisations. Three organisations were in the private sector and three in the public sector. Having carried out interviews, we then also, where possible, conducted focus groups with a representative cross section of the organisation's staff. We collected data through a pre-interview questionnaire and asked for other relevant documentation such as copies of the equality policies at the interview. This was to ensure triangulation of our findings as far as possible.
- 2.3 What is presented in the following section has emerged after a thorough analysis of the findings in each organisation. It represents the key factors that underpin the success or otherwise of the equality and diversity agenda across the organisations.

## Rationale

- 2.4 The study was undertaken to provide a number of cross-sector comparisons to facilitate the identification of effective policies and best practice which might be applied to the UK higher education (HE) sector. The study has also aimed to identify barriers and obstacles which other sectors have faced through their journey, and in particular, look to identify the ways in which these institutions have overcome such barriers in order that this practice might be transferred to the HE sector. The recommendations from this research that are highlighted under each cross cutting theme as 'Key Learning Points' identify the practicable ways in which such practices might transfer to the HE sector.
- 2.5 It is important to note that each of the case study organisations operates in a different environment to HE providers and is often at a different point on the journey. The recommendations for implementation that are based on the key learning points should be considered in this context and it should not be assumed that if all were equally implemented the sector would resolve its current issues in this area. Rather, an HE provider would need to consider its situation and the most suitable emphasis that should be placed on the themes.

## Definition of equality and diversity

- 2.6 In developing our approach we were very aware that the phrase 'equality and diversity' could have a potentially wide range of meaning and application between organisations and could be influenced by a range of factors including legislative compliance as well as other social and economic demands. For the purposes of this comparative study we viewed equality and diversity in a fully integrated way. Rather than focusing on one particular form of (in) equality at the exclusion of others or producing a 'hierarchy', we adopted a broad definition: equality of opportunity, and fairness, for all employees regardless of ethnicity, disability or gender.

## **Methodology**

2.7 The methodology consisted of selection of the case study organisations, the data capture document and interview and then the focus groups. Each of these is explained below.

### **Selection**

2.8 A number of criteria were used in the selection of organisations as case studies. Consideration was given to the size of organisations, their geographic location and the extent to which they were multi-site. The three private sector organisations were also selected in part because of their national reputation in the field of equality and diversity – two of them have won Opportunity Now awards and all three have a high profile through their work with external bodies in the area of equality and diversity. We also sought advice from the project director for the Commission into Black Staff in FE with regard to Education Org, and the Home Office on leading police forces.

2.9 We had hoped to include a not-for profit organisation as a case study and we worked with the Gender and Diversity Network and the National Council for Voluntary Organisations to try to identify a suitable organisation, but we were unsuccessful. The reasons for this were varied but included: a lack of time and resources to commit to the study; in some cases, a feeling that their equality and diversity practice was in an embryonic stage; and for some, that the time required to gain internal clearance to participate would not fit with the project's timescale.

### **Data capture document and interview**

2.10 For the in-depth interview it was important to develop a standardised research tool in order that there was a common framework in which to capture findings. The Data Collection Document (DCD) was developed through a process of consultation with HEFCE Steering Group. The DCD was sent to individuals before the interview in order that they could complete the information sought and prepare fully for the interview, consulting colleagues as appropriate. The individual within the organisation was asked to provide organisation details, staffing numbers and costs, and details of equality and diversity activity. All of this information was collected through a structured questionnaire. Interviewees were also asked to provide any supporting documents such as copies of appropriate policies and procedures, examples of monitoring reports, the outline of any training programmes and general communication information. The final part of the DCD aimed to capture the level to which the organisation had embedded equality and diversity within its culture and structure, using a 'maturity framework'. The framework and a sample of the maturity definitions are attached as Annex A.

2.11 The maturity framework was used as a self assessment tool, and organisations requested to rate their maturity against each of the nine criteria. The maturity framework is based on a five point scale which ranges from limited involvement and understanding in equality and diversity at one end to fully integrated systems and practices at the other with three graduations in between.

2.12 Against each of the ratings the interviewee was requested to provide evidence to support the score, identify obstacles that the organisation had encountered in arriving at its current score and information on any initiatives or activities that had enabled it to reach this level. Once the DCD had been completed, the fieldworker met with the representative at the organisation in order to:

- fully understand the information presented in the DCD and help the individual complete any sections which may be proving problematic
- provide challenges to what had been presented, where appropriate
- request further information/evidence where this was required
- talk through the organisation and logistics of the follow-up focus group.

## **Focus group**

- 2.13 Following the completion of the DCD and the interview, the interviewee was requested to set up a focus group with a range of employees from the organisation. Wherever possible it was requested that the group should reflect a diverse mix of employees, particularly in terms of hierarchy and where the individual sat within the organisation, as well as ethnicity, religion, gender and sexual orientation as far as it was possible to select.
- 2.14 The individual fieldworker facilitated the focus group and aimed to capture the views of the individuals as regards the organisation's performance in the various areas as set out in the maturity profile. The researcher explained the project, guaranteed that all information would be treated in confidence, explained the maturity framework and invited the group to discuss the organisation's progress against each of the areas. At the end of each of the discussions, the group was invited to score the organisation's performance using the framework. The group were not informed of the outcomes of the DCD, which had been filled in, or the scores that the individual had given for the organisation. This was in order that the group could give an impartial score that could be used as a point of triangulation against the information and scores provided in the DCD.

## **Potential challenges to the methodology**

- 2.15 The methodology adopted, although considered to be reasonably robust within the project's constraints, has a number of potential challenges which it is important to be aware of. These are explained below.

### **Impartiality**

- 2.16 It was important, due to the subject matter of the study, to interview in each organisation an individual who had a key role in the implementation and mainstreaming of equality and diversity initiatives within the institution. Evidently such an individual will be highly 'switched on' to the equality of the diversity activity within that institution and may have a more positive view of progress under a number of equality and diversity criteria than other individuals within the organisation who are perhaps less centrally involved in such activities. Wherever possible, in providing views and scorings, the fieldworkers have requested evidence of such activity in order that such ratings can be objectively backed up. The fieldworker also aimed to challenge the interviewee to ensure that the DCD reflected an accurate and unbiased picture of activity within the institution.

### **Selection of focus groups**

- 2.17 The fieldworker was dependent on the contact within the organisation (usually the individual with equality and diversity central to their role) to select the participants who would attend the focus group and thus there was little control from the fieldworker's perspective of this process. Whilst it was requested that the group reflect the diversity of the organisation, because of the lack of control in selection, the focus group may not have been fully reflective of such diversity. For example, one possibility was for the contact to ask for volunteers within the organisation, and such self-selection may have introduced bias towards an interest in equality or diversity issues. The group may also not be fully reflective of the full hierarchy or the organisation – for example support staff such as cleaners and caretakers might not be represented in the group. The fieldworkers attempted to collect reasonable information pertaining to role and seniority in order that intelligent comment might be made on the mix of the group and any bias this might entail in views expressed.

## **Structure of this report**

- 2.18 The remainder of this report details the key findings from the primary research carried out with the six case study organisations, representing different parts of the private and public sector.
- 2.19 This report can be read as a stand-alone document. The vignettes in each sub-section give a flavour of the particular initiatives and context in which each organisation profiled operates; and the findings are presented in high-level summary form, to make them accessible to a wide audience. However, for those who wish to study the more detailed findings, a write-up of each of the case studies has been included in Appendix A.

# 3 Cross cutting themes

3.1 The six case study organisations are anonymous for the purpose of this report. However, in order to provide an understanding of the environmental context of each organisation we have named the case studies by their purpose. The six case studies are therefore named as:

- City Co
- Telecoms Co
- Bank Co
- Education Org
- Hospital Org
- Police Org.

3.2 We report our findings against the maturity framework detailed in Annex A. This has provided a way of comparing the different approaches with each case study organisation to draw out the emerging themes and key learning points.

3.3 There are ten cross cutting themes, compared to the nine criteria in the maturity framework. This was because, on undertaking the analysis, we considered that 'organisational responsibility' for equality and diversity, and the structures to support this, should be considered in its own right. The ten themes are therefore:

- top level commitment
- management systems and organisation culture
- business aims and strategy
- communication and awareness
- training
- accountability and ownership
- action planning
- monitoring and adjustment
- problem solving
- organisational responsibility.



- 3.4 Each of the themes is described below with key learning points. These can often be adapted to the HE sector. The aim of the sub sections is to set out what has gone well, what lessons have been learnt and what activities the HE sector may want to consider looking into the future.

### **Top level commitment**

- 3.5 Top level commitment is defined within the research framework as sponsorship, or support by senior management for equality and diversity issues. The organisations rated themselves on a range from having no visible support for equality and diversity issues, to having senior management pro-actively promoting equality and diversity initiatives, and demonstrating a belief that it makes a positive contribution to overall organisational success.

### **Characteristics and trends**

- 3.6 In the main, the effectiveness of diversity initiatives is dependent on the personal commitment of individual senior managers rather than an over-arching corporate commitment to diversity. However, there were two organisations, one private sector and one public sector, where top level commitment to a diverse workforce was articulated as a business case to improve the performance of the organisation.
- 3.7 Two of the three public sector organisations had to follow and meet external equality and diversity targets, key performance indicators (KPIs), and the requirements of the Race Relations (Amendment) Act, or other equality legislation 'imposed' on them by government. In these instances there was a strong CEO and corporate commitment to achieving the targets or KPIs.
- 3.8 In some of the organisations top level commitment has developed over time in response to 'bottom-up' diversity initiatives. These organisations were particularly sensitive to the experiences and perceptions of their employees and responded appropriately.
- 3.9 Discussion in the focus groups regarding top level commitment was articulated by expressing confidence in particular senior managers who "treat employees fairly". One public sector organisation with a recently appointed CEO demonstrating strong commitment to equality and diversity commented that the CEO "was getting a reputation for decency".

### **Impact of leadership**

The impact that leadership can have on progressing the equality and diversity agenda can be seen at Education Org. The previous director never answered the phone himself and required a principal lecturer as a PA who acted as a gatekeeper. The current director has a background in HR (and) is keen to engage all staff and listen to their ideas. He is accessible and "does the walk and talk". He has led from the top and brought about a culture change within the organisation.

### **Emerging themes**

- 3.10 There is a strong connection between genuinely demonstrated top level commitment to equality and diversity and employees having a positive perception of their organisation as a good place to work as well as the effectiveness of initiatives and performance against any existing equality targets or KPIs.

### **Key learning points**

- 3.11 The critical success factors for the HE sector going forward will therefore include:
- clear and visibly demonstrated commitment to equality and diversity by their governing bodies and senior managers
  - in the absence of external equality and diversity targets or KPIs which increase the pace and effectiveness of initiatives, HEIs could consider setting achievable and measurable internal KPIs. An advantage of external targets and KPIs is that benchmark data will be amassed over time for the sector

- initiatives are likely to be more successful where there is a high profile champion throughout all the stages of planning, actioning, and evaluating, ensuring passage through university committees.

## Management systems and organisation culture

- 3.12 Management systems and organisation culture is defined as the set of policies, supporting systems and values related to equality and diversity. The range for this criterion ran from having policies and procedures being created in an *ad hoc* manner with the main emphasis being compliance with legal requirements, through to having policies and procedures which are informed by external and internal drivers and are clearly linked to wider organisational objectives or cultural values.

### Characteristics and trends

- 3.13 There was a cultural distinction between the private sector organisations and the public sector organisations, with the private sector driven primarily by values, and the public sector by structures.
- 3.14 All three private sector organisations recognised a set of values and capabilities that defined the cultural framework within which employees behaved towards each other. This also applied to the way in which they served their customers. Diversity policies and supporting systems underpinned their culture, but total integration of diversity with organisation wide policies is needed.
- 3.15 The public sector organisations are defined by hierarchical (even in quite flat structures) or status considerations operating within rules and systems. The Police Org focus group expressed the opinion that the combination of actions and systems in place would ultimately result in more equality. The Hospital Org was similar in that the management systems and structures were primarily focused on achievement of financial efficiencies and patient targets, and this created a culture in which it was difficult to engage staff in diversity issues where it did not relate to patient services.

### Active support to combat bullying and intimidation

A police force is by definition a rank-oriented organisation. There has been evidence that bullying or intimidation can go on unfettered. Because such action can actually make or break a police career, handling equality issues is important; particularly in instances (where) actions are prejudiced by an attitude that “the face doesn’t fit”. Police Org has recognised this as a part of the historical culture that it no longer will tolerate. It has revised the Harassment Policy and has created a First Contact Adviser Scheme with over 60 volunteers who have been selected and trained to provide support for individuals who have experienced bullying or intimidation. The Scheme is well publicised in a Conduct at Work paper received by all new recruits, and by posters at all stations. Police Org monitors trends, some of which go forward to the Equalities Forum. The Focus Group reported that while there are still instances of bullying and intimidation in the force there is a “sea change in the culture” where it is accepted that inappropriate action and language will be challenged.

### Emerging themes

- 3.16 The culture of an organisation has an impact on the effectiveness of its human resource (HR) policies including those directly and indirectly related to equality and diversity, for example, recruitment, advancement and personal development. The private sector organisations tended to be more comfortable with loose management systems which allow maximum flexibility, an emphasis on values, and a degree of subjectivity. The public sector organisations were more inclined to rely on their rule-based management systems.

### Key learning points

- 3.17 The critical success factors for the HE sector going forward will therefore include the need to:
- acknowledge the inherent influences on career progression in an organisation where hierarchical position and status is powerful
  - ensure that policies concerning equality and diversity are clearly linked to wider organisation

objectives and are flexible in application

- identify visible indicators of the culture of the organisation, for example, representation of women and people from minority ethnic backgrounds participating in every level of the organisation
- ensure that policies and responsibilities are set alongside development of strong values which are seen to be 'real' and not to be subordinate to achievement of other organisational goals.

### **Business aims and strategy**

- 3.18 Business aims and strategy is defined within the research framework as equality and diversity issues being linked with strategic planning. This criterion ranges from having no clear equality/diversity links with strategic planning and not being seen as contributing to wider organisation success, to equality/diversity being acknowledged as playing a key role in driving organisation change and being fully integrated with corporate strategy.

### **Characteristics and trends**

- 3.19 The organisations varied in the extent to which equality and diversity were drivers of business aims and strategy. Education Org was very bound to being compliant with relevant equality legislation whereas Police Org had a strong business case for diversity based on the belief that good policing was reliant on community confidence in a force with a workforce composition that reflects that of the community, this can result in policing by consent.
- 3.20 Telecoms Co had a cultural vision of the relationship between 'what they do' and 'what difference it makes' which is then highlighted as the real value of diversity.
- 3.21 Education Org was largely motivated by compliance with the relevant legislation but it is making progress in establishing a business case which establishes a causal link between equality and diversity and business success. This has come about recently due to an expansion into new international markets, which has led to recognition of the importance of understanding its new customers' needs and the importance of mirroring the diverse nature of its customer or student base in its staff population to ensure greater success.

### **The business imperative to get equality and diversity right**

Before its transition to a high street bank with plc status, Bank Co was a mutual building society. As such its underlying philosophy and ethos was about sharing with its customers and employees to everyone's mutual benefit. Therefore, not surprisingly, it has embraced diversity and equality quite readily. Diversity and equality has also taken on a wider business imperative with recognition that by pro-actively seeking to broaden its customer base particularly from amongst non-traditional parts of the community there will be commercial advantage to be gained in what is a very competitive market place. This approach now means that other areas of the business such as marketing and corporate communications are also involved in related activity which has taken diversity and equality from being more than just an internal issue to now also influencing the organisation's customer facing activity.

### **Reflecting different groups in the composition on the workforce**

Police Org has recognised that its main business aim of providing effective policing is closely related to achieving its objective for the composition of the police workforce to reflect the high percentage (around 20%) of people from minority ethnic backgrounds in the communities it serves. This is a primary strategy for the force to gain the confidence of the public that will facilitate 'policing by consent' which in turn will reduce crime and anti-social behaviour. A second strategy for gaining public confidence is through the post of Diversity Co-ordinator at Chief Inspector rank within the Community Safety Bureau. This is external facing and monitors, for example, the treatment of Muslim women in police cells. Another example is working with schools to deal with homophobic bullying.

### **Emerging themes**

- 3.22 The public sector organisations have been slower to see the need for establishing a business case; Police Org has embraced this concept most fully out of the three and was in fact rated as good or excellent across a number of PIs in the police force performance tables.
- 3.23 The private sector organisations established a business reason for various activities including broadening their customer base, and retention/progression of key staff.

### **Key learning points**

- 3.24 Establishing a business case for equality and diversity which is incorporated into business planning, monitoring and reviewing initiatives is important for HEIs in demonstrating its value to the success of the organisation, for example, the benefit of the workforce being representative of students, research and business partners. Students from minority ethnic backgrounds require support and role models that are not currently readily available.<sup>1</sup>

### **Communication**

- 3.25 Communication is defined as the methods used in an organisation to explain equality and diversity issues. In organisations where communication is effective, one would expect to see a two-way flow of information that enabled feedback from staff to senior managers as well as messages from the top and systems in place to monitor effectiveness.

### **Characteristics and trends**

- 3.26 In the private sector organisations interviewed, a key tool cited for assessing the climate of the organisation was an employee attitude survey. The key issue with this method is the effectiveness with which feedback from staff is acted upon. A significant minority of the participants in the focus group from City Co had stopped completing the quarterly survey because they were unconvinced that their input made a difference. Steps have been taken by senior management throughout City Co to make the results of the quarterly survey more visible. KPIs have been established to monitor the extent to which business units have addressed issues raised in previous quarterly surveys and these results are shared with staff in business units.
- 3.27 Private sector organisations are more inclined to use e-methods of communication rather than face-to-face methods. They all produce regular in-house magazines. There was evidence of a communications plan in Bank Co only. This is given more importance now that the Board signs it off.
- 3.28 In the three public sector organisations, there is greater emphasis on external communication rather than internal communication. In Education Org, there is formal consultation with around 200 organisations whenever they are considering making a major change to their policies or are going to introduce a new diversity initiative. The police force has a community safety bureau which works directly with vulnerable sections of the community.
- 3.29 There was less evidence of effective internal communications strategies and actions although lessons had been learnt at Education Org which is a multi-campus institution. In the past there has been a dependence on communication via the intranet and email, which was excluding staff without access to email, particularly community workers who were largely based at outreach centres. There has now been a drive towards face-to-face communication through using heads of departments to deliver key messages.

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<sup>1</sup> Times Higher Education Supplement 2 July 2004

### **Relating diversity and equality to day to day activities**

At Telecoms Co they have found that an effective way of getting the diversity and equality message to a lot of people spread across a number of operating sites is through an electronic newsletter via the company's intranet. A team of volunteers that supports the company's diversity agenda puts this together. Because it is electronic there are virtually no set-up costs. The emphasis in terms of content is not on the big strategic issues but more about ordinary things, people's experiences and their lives in terms of day-to-day activities. The view is that employees want to read about something they can relate to, and as a result this will start to engage them in the related issues. Along with other initiatives, this approach is helping to mainstream diversity and equality related terminology, which is becoming part of day-to-day language in the organisation.

### **Emerging themes**

- 3.30 Communication in all organisations is predominantly top down. This has been mitigated to some extent through the use of 360 degree feedback systems in the private sector. In the public sector this has taken the form of increasing the amount of information delivered in face-to-face forums allowing for a greater flow of two way communication.
- 3.31 The other trend noted was the tendency to focus on communication with external stakeholders rather than internal stakeholders in the public sector, in part due to the fact that external drivers often drive internal initiatives.

### **Key learning points**

- 3.32 For good communication, HEIs need to:
- have effective channels that allow for a two way flow of communication
  - use a variety of formats – people may ignore or not be able to access emails – and as the public sector organisation case studies show face-to-face communication is more powerful
  - incorporate equality and diversity into a wider corporate communications strategy so as to ensure consistent messages about diversity have deep penetration to all internal stakeholders.

### **Training and awareness**

- 3.33 If equality and diversity training is considered on a spectrum from ineffective to fully effective, then at its most minimal training is viewed as a cost. Organisations where training is fully integrated into their approach to equality and diversity view it as a source of business advantage and as a tool to bring about organisational change.

### **Characteristics and trends**

- 3.34 Two of the three private sector organisations consider training as important at the stage they have reached in mainstreaming equality and diversity initiatives, and both are planning to roll out mandatory electronic learning training modules in the autumn. Telecoms Co, however, believes that awareness raising, as opposed to training, is at the heart of its diversity programme and it is particularly proud of the fact that it runs the programme based on voluntary involvement from frontline staff which the organisation has trained so that they have the confidence to deliver the message to their colleagues.
- 3.35 Whilst all three public sector organisations see training as an imperative, there has been a tendency to see it as a day lost from service delivery because of the resourcing issues. This has been addressed through the introduction of e-modules, and Education Org has won national awards for its e-based training. One of the success factors at Education Org is that the head of training development is on the senior management team and committed to equality and diversity. His work is supported by a specialist unit, headed by an individual who carries out research within the field of equality and diversity.

### **Systematically meeting training needs**

Training at Education Org is considered as integral to bringing about a culture change in relation to equality and diversity within the organisation, so training budgets are not cut and there is an ongoing process of e-based training available. In some departments staff go through the training together and then discuss what they have learnt, whilst in other departments, responsibility lies with each individual to carry out the training in a specified time period. The development of the training is based on the results of an annual training needs analysis/skills audit that HR carries out electronically via department heads. Much of the content is provided by a specialist unit, which started off looking at disability issues for students, but now covers a spectrum of initiatives.

### **Use of awareness workshops**

At Telecoms Co emphasis is placed on the fact that it does not train staff in diversity and equality issues - it is not necessarily asking them to learn a new skill as such. It prefers to classify their approach as 'raising awareness'. It is a recognition that in this particular area you can not simply tell people what to do or how to think – they have to understand the issues and embrace the appropriate behaviours of their own accord. Delivery of the awareness workshops is undertaken largely by volunteers from across the organisation, in the expectation that staff will be more ready to listen to their peers, and therefore will take on board the key messages and look to apply them in the workplace. It is an approach that seems to be successful. Although work still needs to be done on formal evaluation, informally the organisation can gauge its effectiveness by what happens in daily working life. For example, a recent workshop on bullying and harassment prompted a rise in complaints from employees who felt they were being bullied by their boss.

### **Emerging themes**

- 3.36 Whilst there is a trend towards developing e-modules to deal with issues of resource constraints, some of the most successful examples continue to be face-to-face, particularly when the focus is on awareness raising with the objective of changing attitudes. In relation to content, focus group participants indicated that they responded better when it was based around the development of a framework and guiding principles rather than a more rule-based approach.

### **Key learning points**

- 3.37 Key learning points for HEIs include:
- consideration of the purpose, format and content of training to ensure that the most effective approach is developed
  - adoption of a cultural or appreciative approach that celebrates differences amongst individuals.

### **Accountability and ownership**

- 3.38 Accountability and ownership reviews the extent to which all staff recognise that they as individuals have a responsibility for implementing the equality and diversity agenda and thus bring about change.

### **Characteristics and trends**

- 3.39 It was clear from all the case study organisations that to embed equality and diversity initiatives, ownership of the diversity agenda was required at all levels. There have been a range of responses as to how to tackle this. In the most successful of the private sector organisations this has happened through the introduction of a diversity related objective in the key performance indicators for the partners.
- 3.40 In the public sector organisations, there have been two approaches. In Education Org the organisation is screening all its policies and carrying out impact assessments in all the core areas of the business. The other example of success has been an external driver as seen with Hospital Org where the National Chief Executive has decreed that every senior manager or CEO needs to act as a mentor to a more junior member of staff from a minority ethnic background in 2004/05.

### **Mentoring to improve understanding**

In January 2004 the NHS Executive launched the Leadership and Race Equality Scheme. This initiative tasked all senior managers in NHS hospitals to mentor an individual from a minority ethnic background. It is expected that future priority areas for NHS Trust performance indicators will include recruitment and retention, and career progression of minority ethnic staff. Hospital Org has embraced this scheme already e.g., a senior administrator at director level is mentoring a senior midwife from a minority ethnic background.

### **Emerging themes**

- 3.41 It is clear that whether it is through external drivers or internal performance processes there needs to be a reward and punishment mechanism to ensure ownership and accountability of the equality and diversity agenda.

### **Key learning points**

- 3.42 The critical success factors for HE include:
- using external drivers such as HEFCE to stipulate that all HEIs need to embed diversity and equality objectives into their targets for appraisals
  - driving the 'carrot and stick' approach internally until the equality and diversity agenda becomes an accepted part of the culture.

### **Action planning**

- 3.43 Action planning looks at the extent to which an organisation determines annual priorities in relation to equality and diversity initiatives and how far staff are involved in that process.

### **Characteristics and trends**

- 3.44 The person-centred culture<sup>2</sup> found in HE is reflected in City Co. One of the drawbacks of extreme forms of this culture is that it is not sufficient to endorse something centrally, it needs to be reinforced through support at different levels of the organisation. Therefore in City Co, the diversity team work closely with internal self-managed networks such as the women's network, the ethnic minority forum and the gay and lesbian network to develop and implement parts of the action plan. A similar but less formalised structure can be found in Telecoms Co and Bank Co.
- 3.45 Telecoms Co, Education Org and Hospital Org all look externally for ideas and exemplars of good practice to inform their action planning. For example, Education Org had a limited understanding of the issues relating to ethnicity so they worked closely with providers in a nearby city that had more experience to develop their own knowledge. Hospital Org has a major external driver that it impacts on its action planning - to develop a representative workforce which mirrors the communities it serves.

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<sup>2</sup> Charles Handy would define HE as a person-centred culture because the primary interest of academics is to carry out research and build their own reputation rather than support the development of a corporate brand.

### **Changing the recruitment and progression procedures**

In 1999 the Home Office implemented an initiative by setting race equality employment targets and an accompanying action plan in a publication entitled 'Dismantling Barriers to reflect the community we serve'. Phase II was implemented in January 2004 with the publication of the Breaking Through action plan which maintains focus on the process of achieving a representative service. The action plan details required Recruitment, Retention, and Progression Outcomes with exemplary actions, measures and possible tactical options. Police Org has reviewed and revised its recruitment and progression procedures and put in place some initiatives to achieve the targets. One example is the Buddy Support Scheme which is a group of officers and police staff who act as informal, off-the-record advisers to women and to minority ethnic individuals who have requested a recruitment pack or are contemplating joining the force.

### **Emerging themes**

- 3.46 It is clear that senior management buy-in is an enabler. However, this has to be balanced with the fact that senior management priorities are often different to those of equality and diversity practitioners and therefore the pace of change can be affected.

### **Key learning points**

- 3.47 Critical success factors for HE include:
- getting endorsement of plans at an appropriate level of seniority to ensure that action planning is streamlined rather than *ad hoc*
  - awareness of internal factors that drive HEIs such as the influence of the academic body – consider using networks set up to tackle specific equality and diversity issues to get buy-in across the institutions
  - informing action planning through scanning the external environment for good practice exemplars.

### **Monitoring and adjustment**

- 3.48 Monitoring and adjustment is the way in which diversity and equality information is assessed or measured and used to inform future planning.

### **Characteristics and trends**

- 3.49 Across the majority of organisations there is a clear recognition of the value and importance for activity in this area. Most acknowledge that in their own organisation it is not yet being undertaken in a consistently structured and coordinated manner. In part this is due to organisations still needing to understand the type of information that will be of greatest value and the most effective way of collecting it.
- 3.50 From our case studies it would also appear that it is amongst the public service organisations that there is a bigger push in this area which in the main is driven by external government agencies, particularly for example with Education Org where there is a long established tradition of collecting monitoring data on the workforce and where there is a ten-year plan to implement equality and diversity initiatives with a major focus on carrying out impact assessments.
- 3.51 Nonetheless, the organisations are still approaching this issue with a general view that it is more than just collecting data as a 'tick-in-the-box' exercise – the real value is using it in a pro-active way to inform future planning and activity. For example, Police Org undertakes monitoring of staffing data to identify blockages in recruitment of women and minority ethnic applicants and makes adjustments as appropriate.
- 3.52 There is also a view that qualitative data is potentially of greater value than just statistics. For example, City Co and Telecoms Co conduct employee attitude surveys that include sections specifically relating to equality and diversity. The findings then feed into the planning process.



### Putting monitoring information to use

Telecoms Co has described itself as being on a journey and is looking to establish diversity into the 'life blood' of the organisation. A key requirement therefore is to regularly take stock of what it is currently doing in this area and in particular understand the nature of any changes it needs to make. One of the ways it does this is through its annual staff survey that considers a number of diversity related questions. There are also regular focus groups that consider a range of issues - the organisation's new values and capabilities; disabled people; ethnic groups; women's issues - as well as closely liaising with each of the internal network groups and monitoring feedback from their annual conferences. There is also an intranet site which has been set up to collect the views and opinions of staff regarding diversity. The range of information collected is fed back to diversity champions and through to diversity steering groups, which in turn feeds into the senior management team which will review the data and use it to inform diversity action planning at a top level. The results of the action planning decisions are then fed back down to local teams and departments to take ownership of the issues and develop their own action plans in response. Amongst the most common issues are those that relate to bullying and harassment, work/life balance, stress, and talent pools.

### Emerging themes

- 3.53 For many of the organisations this is an area that is recognised as requiring more development if they are to become fully effective in applying the monitor-evaluate-review process. Clearly there are resource implications relating to, for example, setting up the necessary systems and processes but in the first instance the challenge is to be clear as to what needs to be monitored, rather than how.

### Key learning points

- 3.54 For HEIs the following points need to be considered to radically impact on current practice, which tends to focus on the collection of monitoring data rather than analysis of data collected to inform policy:
- There needs to be recognition that effective collection and analysis of data also requires a cultural change within HEIs and this will not happen quickly. In the case study where this activity was carried out most effectively, they had been involved in the process for over 20 years
  - Change is more likely to happen if there is long-term strategic planning – five-to-ten years – in which HEFCE requires HEIs to carry out full impact assessments on all their policies.

### Problem solving

- 3.55 Problem solving is the way in which related issues are managed and dealt with and provides reassurance to individual employees.

### Characteristics and trends

- 3.56 A key issue identified from our case studies was the importance that employees place on the comfort of knowing any related issues they raise will be taken seriously and feeling confident there will be no implications for themselves or their careers if they make a complaint, for example, about being bullied.
- 3.57 Each organisation has documented policies and procedures which set out how concerns or more formal grievances are handled. For example, Hospital Org has *The Trust Policy for Challenging Harassment in the Workplace* while Police Org has published a comprehensive directory titled *Someone to talk to*, which lists internal and external sources of advice and support for staff. In City Co and Bank Co, both of which are private sector organisations, support is also available to staff through telephone counselling provided by external specialists.
- 3.58 Despite having the processes and procedures in place organisations still need to regularly communicate to staff about their existence and re-assure them they are objectively applied. For example, at Education Org they set up a network of anti-harassment advisors in 2003/04 in response to the number of incidents that were reported in the previous year despite having focused on bullying and harassment issues two years earlier.

- 3.59 There is an important role for managers within this process as they need to have the confidence and competence to deal with staff issues in this area. In Bank Co managers have been trained in how to handle employee concerns at work as part of a major initiative rolled out about 18 months ago, led by Public Concern at Work.
- 3.60 Employees also want to see evidence that issues are being dealt with, for example, the members of the focus group held at Telecoms Co wanted to know that bullying and harassment problems would be dealt with by moving the manager doing the bullying away from the department and not moving the employee.

#### **Reducing the workload of those always seen as approachable**

At Bank Co, diversity related problems are dealt with in the same way as other issues. These range from informal discussions with a manager of their choice from within their business unit through to telephone counselling support provided by a private healthcare organisation. Initially employees were free to choose any manager to discuss issues with. However, as a result it was found that a small number of managers who were particularly capable in this area were always being approached by employees to deal with a grievance. In response the organisation has done a lot of work in training all its managers in how to deal effectively with employee concerns in the workplace.

#### **Emerging themes**

- 3.61 Organisations need to work hard at communicating to employees not just the details of related policies and procedures but also a reassurance that any issues they have will be dealt with in a fair and consistent way.

#### **Key learning points**

- 3.62 Key points important for success in this area are that:
- higher education institutions need more than well documented policies and procedures, the policies need to be visible and accessible on the intranet and preferably the internet and there needs to be ongoing communication to staff on the steps to take if they have difficult problems such as harassment
  - whilst good practice might suggest that heads of departments should handle grievances directly, this will not be handled successfully if they do not have the confidence or the skills to manage what can be quite complex situations.

#### **Organisation responsibility**

- 3.63 Organisational responsibility looks at where in the organisation the functional responsibility for diversity and equality sits. Although it was not a criterion within the framework, our research led us to recognise its importance as a factor in its own right.

#### **Characteristics and trends**

- 3.64 Although there is not a standard delivery model across the six organisations there are areas of similarity with regard to how the diversity and equality function and related activity is managed.
- 3.65 Senior sponsorship and support is to be found in each of the organisations. This is either at an individual level as with Telecoms Co where it is the managing director, or shared between senior postholders. For example, in Hospital Org this involves the director of personnel, the head of education training and development, deputy chief nurse, and the chief executive. In Police Org there is a diversity strategy board chaired by the deputy chief constable, which provides a strategic overview of the force's entire diversity interface, both internally and externally.
- 3.66 Most organisations have an identified individual or team responsible for day-to-day related activity. In City Co the diversity team consists of a manager as head of diversity and two operational support staff. In Bank Co there is a senior HR policy consultant who focuses on equality/diversity policy and strategy, supported by a colleague also involved on a full-time basis who works pro-actively with the local community.

- 3.67 Interestingly, in Telecoms Co there are no full-time staff responsible for diversity as such, and neither is there a diversity budget. Diversity is 'managed' through steering groups of around ten members from different parts of the business and different levels of seniority who volunteer their time.
- 3.68 Elsewhere, we found in Education Org the equality working group, in Bank Co the diversity action groups, and in Hospital Org the diversity and equal opportunities steering group chaired by the director of personnel. In Telecoms Co there are also a number of network groups such as the ethnic minority network which also generates active involvement from staff in equality and diversity issues.
- 3.69 In bringing all of the case study examples together we can see that the organisations have taken quite different approaches to the staffing and organisation of equality and diversity support. This provides a useful spectrum of activity to consider when deciding how or whether to set up a unit and the likely cost.
- 3.70 City Co employs three (1.5 full-time equivalent, FTE) professional or management staff at a cost of £150,000 as well as 2.8 FTE staff at the operational level at a cost of £175,000, and the business allocates between £1 million and £2 million to equality and diversity. Whilst Education Org is similar in terms of staff provision, employing four managers or professionals and one operational member of staff, the rewards are lower, with an equality officer's salary just under £26,000. Both Bank Co and Hospital Org have one member of staff overseeing equality and diversity issues. Bank Co also has a second member of staff at a more junior level and the combined staff cost for the two roles is £70,000. Bank Co also has voluntary groups of employees totalling 40 people from other areas of the business who meet four-to-six times per year. Telecoms Co has similar voluntary groups totalling 40 people, and also employs 17 coaches who cover all sorts of issues concerning bullying, harassment etc. However, neither Telecoms Co nor Police Org has any one person specifically employed to look at equality and diversity.

#### **Structures without formality**

In Telecoms Co there are no full-time staff responsible for diversity as such. The manager with most involvement in diversity activity reports to the head of HR and is a member of the People Programmes department which has a remit covering change, diversity, Investors in People, employee satisfaction, and corporate and social responsibility. Diversity is 'managed' through steering groups which sit in each of the organisation's four business lines. Each steering group has around ten members drawn from different parts of the company. The steering groups have no budgets and the time commitment varies. In addition to several meetings a year there are 17 coaches who deliver training workshops around e.g. bullying and harassment and their time input can be between one and two days a month. Later this year the number of coaches will be increasing to 40 in order to deal with the roll-out of disability awareness seminars.

#### **The role of the diversity team**

City Co is very large and in many senses could be described as a federation of small businesses. It needed to find other ways to explain the importance of equality and diversity issues and get staff involved in driving the agenda forward. The diversity team helped stimulate demand for networks with a particular focus, such as women, gay and lesbian, and ethnic minority staff. This has had a mushrooming effect and there is now a whole raft of new networks including those for Muslims and Hindus. As the networks mature and they begin to have a more formal structure, the diversity team has asked them to become more involved in action planning. In the case of the women's network, this led to a subset of the steering group working with others from the organisation to develop the company's first mentoring scheme.

#### **Emerging themes**

- 3.71 Although organisations have 'diversity managers' they tend not to be at senior executive level. For this reason it is important that the most senior people in the organisation openly support diversity and equality. Furthermore, the development of a network and committee structure involving staff from all levels will facilitate and encourage ownership of diversity and equality across the organisation.

### **Key learning points**

3.72 When considering the organisational infrastructure, it is not just about the level of resource as the Telecoms Co vignette demonstrates. Key success factors include:

- recognition from all staff that their own engagement in mainstreaming equality and diversity is vital rather than taking the view that responsibility lies with the individual or unit with equality and diversity in their title
- diversity units inspiring individual staff members to get involved in promoting the agenda either through supporting the establishment of networks or through the encouragement of volunteers as in the example of the Telecoms Co network of internal trainers
- regardless of where the above role sits within the organisation, it is vital that visible support from the most senior management is provided.

# 4 Conclusions and recommendations

## Conclusions

- 4.1 The conclusions of the report bring together the key enablers and lessons learnt followed by the recommendations following from the research findings.

## Enablers

- 4.2 The following enablers were identified from the research:

- there is a strong connection between genuine top level commitment to equality and diversity (E&D) and a positive perception by the employee that their organisation is a good place to work
- the culture and wider organisational objectives must be understood in the context of, and explicitly linked to, E&D policies
- it is necessary to have two way communications about E&D issues, measurements and explanations if it is to be successful
- achieving E&D is viewed as critical to achieving successful delivery of the business plan.

## Lessons learnt

- 4.3 Lessons learnt arising from the completion of this project were:

- internal communications of E&D are often overlooked in favour of external communications
- traditional 'training' in E&D can be a turn-off, it can therefore be 're-badged' and re-packaged for different staff segments so that it remains relevant and staff remain receptive
- organisations are still struggling to collect the right data and information, and there is an emerging view that qualitative data are potentially of greater value than statistics
- even with policies and procedures in place staff will need continual reassurance that when an issue does arise it will be dealt with in a fair and consistent way
- it is disproportionately easier to reduce an individual's beliefs in their organisation's commitment to E&D than it is to build it.

## **Recommendations**

4.4 There are activities that HEIs and others could look to develop and embed, learning from the case study organisations. However, institutions must first undertake an analysis of their own situation including their:

- E&D drivers
- culture
- understanding of E&D issues
- position on the journey.

Not all recommendations will be applicable to all HEIs in the same way, and instead success must be measured by positive outcomes not a tick box of the input activities.

### ***Top level commitment***

It is recommended that there is clear and visibly demonstrated commitment to equality and diversity by the governing bodies and senior managers. In the absence of external equality and diversity targets or KPIs, which increase the pace and effectiveness of initiatives, HEIs could consider setting achievable and measurable internal KPIs. An advantage of external targets and KPIs is that benchmark data will be amassed over time for the sector. Finally, any initiatives implemented are likely to be more successful where there is a high profile champion throughout all the stages of planning, actioning, and evaluating, ensuring passage through university committees.

### ***Management systems and organisational culture***

The organisation should acknowledge the inherent influences on career progression in an organisation where hierarchical position and status is powerful. Where there are policies concerning equality and diversity these should be clearly linked to wider organisation objectives and they need to be flexible in application. There should also be visible indicators of the culture of the organisation, for example, representation of women and people from minority ethnic backgrounds participating in every level of the organisation.

### ***Business aims and strategy***

It is recommended that a business case is established for equality and diversity and that it is incorporated into business planning, monitoring and reviewing initiatives. This will include the benefits of the workforce being representative of students, research and business partners. Also, students from minority ethnic backgrounds require support and role models that are not currently readily available.

### ***Communication and awareness***

The organisation should have effective channels that allow for a two way flow of communication. To enhance this, use should be made of different communication formats, for example people may ignore or not be able to access emails. Equality and diversity should be incorporated into a wider corporate communications strategy so as to ensure consistent messages about diversity have deep penetration to all stakeholders.

### ***Training***

When training takes on a “do this but don’t do that” approach, it is not very effective. Therefore, rather than being rule based, with a tendency to become prescriptive, the focus should be on raising awareness and taking a cultural or appreciative approach that celebrates differences amongst individuals.

### ***Accountability and ownership***

It is recommended that the change in accountability and ownership for individuals is measured. Also, external drivers, such as HEFCE, could be used to stipulate that all HEIs need to embed diversity and equality objectives into their targets for appraisals. Finally, the 'carrot and stick' approach should be driven forward internally until the equality and diversity agenda becomes an accepted part of the culture.

### ***Action planning***

Plans should be endorsed by an appropriate level of seniority to ensure that action planning is streamlined rather than *ad hoc*. Also, awareness of internal factors that drive HEIs, such as the influence of the academic body, should be raised. This could include the consideration of the use of networks set up to tackle specific equality and diversity issues to ensure buy-in across the institutions. Action planning should also consider and include good practice exemplars identified through scanning the external environment.

### ***Monitoring and adjustment***

Organisations need to be clear as to what exactly is meant by equality and diversity data in terms of what type of information is of most value. Once collected the data need to be used effectively to inform planning. The process should not be seen as being static – it will need to evolve over time as the organisation's own experience in this area develops.

### ***Problem solving***

There is a need for well documented policies and procedures to be supported by plenty of communication. It should be recognised that not all managers will want to or be able to provide appropriate counselling support to employees. Those organisations that regularly deal with the general public will also need to ensure staff are aware that they are protected in the event of a grievance against a person who is not an employee.

### ***Organisation responsibility***

As diversity is about "the ways things are done" it requires ownership across the organisation if it is to become mainstreamed. Therefore, there is still the need for individual diversity managers or teams to take responsibility for providing the day-to-day support within the organisation. Regardless of where the role sits within the organisation, it is vital that visible support from the most senior management is provided.

# Annex A – Maturity framework

Criteria	Maturity rating (1-5): Ignorance or lack of awareness -1; Awareness -2; Understanding -3; Competence - 4; Excellence - 5.
<ul style="list-style-type: none"> <li>Top level commitment</li> </ul>	<p>1 – There is no visible sponsorship, support or commitment within the organisation</p> <p>5 - Senior management proactively supports and promotes equality/diversity inside and outside the organisation and believes it makes a positive contribution to overall organisation success</p>
<ul style="list-style-type: none"> <li>Management systems and organisation culture</li> </ul>	<p>1 – Any equality/diversity policies and supporting systems are created in an inconsistent way with the main emphasis being to comply with legal requirements</p> <p>5 – Policies and procedures are informed by a wide range of inputs from the internal and external environment, have clear links to wider organisational objectives and are flexible i.e. based on values rather than rules. Approaches are regularly compared with 'best external practice'</p>
<ul style="list-style-type: none"> <li>Business aims and strategy</li> </ul>	<p>1 – There are no clear links between equality/diversity and strategic planning. It is seen as a cost and not contributing to wider organisation success</p> <p>5 – Equality/diversity is acknowledged as playing a key role in driving organisational change and is fully integrated with overall corporate strategy. There is unanimous agreement at senior executive level of its value and contribution to organisation performance and success</p>
<ul style="list-style-type: none"> <li>Communication and awareness</li> </ul>	<p>1 – Communication related to equality/diversity activity is limited to that prescribed by legislation. Additional communication is reactive and <i>ad hoc</i>. The organisation operates on a very limited 'need to know' basis and does not actively seek out employee feedback</p> <p>5 – Open two-way communication relating to equality/diversity is a part of the organisation culture and links to other practices such as 360 degree feedback etc. The content of communication and the channels and media used are reviewed and updated to ensure effectiveness. Regular communications audits are undertaken, supported by attitude surveys, focus groups etc. Communication is with staff at all levels including under-represented groups</p>



Criteria	Maturity rating (1-5): Ignorance or lack of awareness -1; Awareness -2; Understanding -3; Competence -4; Excellence -5.
<ul style="list-style-type: none"> <li>Training</li> </ul>	<p>1 – Training provision in the area of equality/diversity is seen as a cost and only directly related, job specific training is undertaken</p> <p>5 – A systematic approach is taken to identifying and providing training and development support to meet current and future equality/diversity needs including challenging personal styles of behaviour and thinking. The training provided in this area is seen as being integral to the organisation's strategic change capacity, a source of business advantage, and is evaluated at every level within the organisation</p>
<ul style="list-style-type: none"> <li>Accountability and ownership</li> </ul>	<p>1 – There is no one designated individual directly accountable for equality/diversity in the organisation</p> <p>5 – Equality/diversity is fully integrated into all management systems and is promoted through the organisation's culture. Information and feedback systems are in place to maximise staff involvement and commitment. All staff demonstrate an ownership of equality/diversity</p>
<ul style="list-style-type: none"> <li>Equality/diversity action planning</li> </ul>	<p>1 – There is a top level statement regarding equality/diversity but no formal process to communicate, provide training or monitor performance</p> <p>5 – The organisation adopts a leading edge approach to the planning process which focuses on the quality and employee contribution to its equality/diversity practices and procedures rather than just ensuring it is legally compliant</p>
<ul style="list-style-type: none"> <li>Monitoring and adjustment</li> </ul>	<p>1 – No particular equality/diversity targets or objectives are set and monitoring does not take place</p> <p>5 – Comprehensive, focused monitoring integrated into review and planning processes is used by the organisation and is seen as relevant by employees. The process provides quantitative and qualitative information to help support future practice that is directly relevant to the organisation and its employees</p>
<ul style="list-style-type: none"> <li>Problem solving</li> </ul>	<p>1- There are no formal mechanisms in place to resolve equality/diversity problems which are dealt with in an inconsistent manner dependent on managerial capability</p> <p>5 – The organisation has invested in the training of managers who are competent to deal with complaints. Individual employees are usually confident that problems will be dealt with fairly and consistently and any lessons learned from the experience will be adopted</p>

This final report has been prepared in accordance with the agreed terms of engagement and for no other purpose. We do not accept or assume liability or duty of care for any other purpose or to any other person to whom this report is shown or into whose hands it may come. This is our final report and constitutes our definitive findings.

