

Meeting of:	Cabinet
Date of Meeting:	Monday, 23 March 2020
Relevant Scrutiny Committee:	Learning and Culture
Report Title:	Annual Equality Monitoring Report 2018 - 2019
Purpose of Report:	To seek Cabinet's approval of the Annual Equality Monitoring Report
Report Owner:	Executive Leader and Cabinet Member for Performance and Resources
Responsible Officer:	Rob Thomas, Managing Director
Elected Member and Officer Consultation:	Corporate Management Team
Policy Framework:	This is a matter for Executive Decision

Executive Summary:

This report brings to the attention of the Cabinet our progress against the equality objectives of the Strategic Equality Plan 2016 - 2020 and other actions taken to improve equality for people living and working in the Vale of Glamorgan.

It summarises what Services have done to collect and analyse equality data on how people with protected characteristics have used their services. It notes what they have done to make improvements in the reporting period 2018 - 2019.

It comments on progress made with each of the equality objectives and where we need to continue to focus our efforts.

It refers to appendices which show the data collected and analysed by Services, a detailed report on employment information, and an employment action plan.

It has not been considered by the Learning and Culture Scrutiny Committee due to the cancellation of its meeting.

Recommendations

- 1. That Cabinet considers this report and approves the Annual Equality Monitoring Report 2018 2019 for publication by 31 March 2020.
- 2. That the use of article 14.14.2 (ii) of the Council's Constitution (urgent decision procedure) be authorised in respect of recommendation 1. above in order to publish by the statutory deadline of 31 March 2020.

Reasons for Recommendations

- 1. To allow the Authority to meet the reporting duty under the specific duties for Wales and continue to make progress towards meeting the public sector equality duty and to ensure our equality work is available for scrutiny by the Equality and Human Rights Commission and others.
- 2. To ensure publication by the 31 March 2020.

1. Background

- 1.1 The Equality Act 2010 includes a public sector equality duty (the 'general duty') and there are specific duties for Wales.
- 1.2 The specific duties include the requirement to publish an annual report for the previous year by 31 March each year to demonstrate the progress made on equalities issues that are contained within the Council's Strategic Equality Plan and any associated equalities activity.
- 1.3 This report provides Cabinet with the Annual Report for the period 2018 2019. We were not able to seek the views of the Learning and Culture Scrutiny Committee due to the cancellation of its meeting. It is recommended that Cabinet considers the content of Appendix A and approves the report.
- Cabinet will note that the Council has recently sought approval of a new Strategic Equality Plan 2020 2024 and the information contained in the Annual Report has been used as part of the evidence base in the development of the new Strategic Equality Plan.

2. Key Issues for Consideration

2.1 The Annual Equality Monitoring Report for 2018-19 can be found in Appendix A. The report provides information relating to the eight equality objectives contained in the Strategic Equality Plan 2016-2020.

2.2 These objectives are:

- Collect and analyse service data by protected characteristic so services meet the diverse needs of the public
- Close attainment gaps of children in protected groups
- Make public documents easier for people to read and understand
- Help staff know more about equality law, and staff and the public to understand the needs of protected groups
- Seek the views of protected groups on proposed changes to policy, budgets and services
- Encourage people with protected characteristics to report hate crimes, harassment and discrimination
- Find new ways of reaching victims of domestic abuse and raise awareness of domestic abuse services in the community
- Reduce the gender pay gap and improve employment opportunities for protected groups
- 2.3 The Annual Equality Monitoring Report is structured to meet the requirements of the Equality Act and specific Duties for Wales. The Report therefore includes:
- Background information about the purposes of the Report and the way it has been developed;
- The steps the Council has taken to identify and collect relevant information (and any reasons for not collecting information);
- How the Council has used this information in meeting the three aims of the general duty;
- A statement on the effectiveness of the Council's arrangements for identifying and collecting relevant information;
- Progress towards fulfilling each of the Council's existing equality objectives (setting out what has been done, what has been learnt, where the challenges lie and what still needs to be done);
- A statement on the effectiveness of the steps that the Council has taken to fulfil each of its equality objectives;
- The report contains specified employment information, including information on training and pay.
- 2.4 To demonstrate how other relevant matters (outside of the specific work on the equality objectives) have contributed to this work, the annual report also includes a section on these issues and their contribution to show the wider work underway across the Council.

- 2.5 The Annual Equality Monitoring report contains a series of appendices to provide further information and make linkages with other relevant reports.
- **2.6** Cabinet is requested to consider and approve the Annual Equality Monitoring Report at Appendix A.
- 2.7 Once approved, the Annual Equality Monitoring Report will be translated and published on the Council's website.
- 2.8 Work to progress the Council's Strategic Equality Objectives for the final year of the existing Strategic Equality Plan for the period 2019 20 will be reported to Scrutiny and Cabinet in due course.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1 The Strategic Equality Plan and its delivery demonstrates the five ways of working and the pursuit of the Council's well-being objectives.
- 3.2 It is a long-term plan aiming to improve equality for residents over a period of time through the achievement of its equality objectives. We have used research and evidence from the Equality and Human Rights Commission's 'Is Wales Fairer' which outlines the key challenges for improving equality in Wales.
- 3.3 It aims to prevent identified challenges from getting worse and to put in place measures which can improve fairness and equality for people who live or work in the Vale of Glamorgan. This is underpinned by our responsibilities under the 'general duty' of the Equality Act 2010 and the specific equality duties for Wales.
- **3.4** The equality objectives can only be achieved if there is collaboration across Council Services.
- 3.5 There are equality objectives relevant to most services, such as collecting and analysing data, and engaging with protected groups. Others are specific to a particular service, such as the domestic abuse objective. In turn, some of these will need collaboration with external partners. For example, our Community Safety Team works closely with Atal y Fro an external organisation providing services for those experiencing domestic violence.
- 3.6 To develop the original Strategic Equality Plan in 2012 and to update it in 2016, we involved people through an engagement and consultation process with stakeholders and the public to develop our equality objectives. Each of the equality objectives has an action plan to explain what we aim to do to achieve that objective. There is an equality impact assessment in place which describes the impact of this work on protected groups.

4. Resources and Legal Considerations

Financial

- **4.1** Officer time is needed to collect, analyse and report on equality and employment information on a regular basis. The benefit is a better understanding of how to target resources to deliver services which best meet the needs of users.
- **4.2** The actions ensure that the Council complies with legislation (avoiding a potential adverse cost implication for non-compliance).

Employment

- 4.3 Officer time is needed to collect, analyse and report on equality and employment information on a regular basis. The benefit is a better understanding of how to target resources to deliver services which best meet the needs of users.
- 4.4 The Plan contains equality objectives specifically related to employment (regarding the reduction of the gender pay gap) and makes references to the employment profile of the Council as required by the Equality Act.

Legal (Including Equalities)

- 4.5 The Equality Act 2010 created a public sector duty, replacing the race, disability and gender equality duties. The duty came into force in April 2011. The duty covers age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. Under the general duty, public sector organisations must have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; foster good relations between different groups.
- **4.6** The duty to have due regard to the need to eliminate discrimination also covers marriage and civil partnership.
- 4.7 The Equality Act gives Welsh Ministers the power to impose specific duties through regulations. The specific duties are legal requirements designed to help public bodies meet the general duty. These were published in April 2011.
- 4.8 The Equality and Human Rights Commission published guidance on the public sector equality duty for Wales on 8 June 2011. It performs a regulatory role to ensure that listed bodies comply with the duty. If the Equality and Human Rights Commission believes that the Council has not complied with a public sector equality duty, it has the power to seek compliance.
- **4.9** The Annual Equality Monitoring Report sets out how the Council has been working to meet the general duty and public sector equality duty for Wales.

- 4.10 The Council is required to collect, use, and publish equality and employment information to help understand how its policies, practices and decisions affect individuals who share one or more of the protected characteristics. This process is essential if the Council is to comply with the requirements of the public sector specific equality duties in Wales. The information is required to accurately inform the equality impact assessment process, the Strategic Equality Plan and equality objectives.
- **4.11** The work reported upon in the Annual Equality Monitoring Report will assist in promoting community cohesion by meeting the diverse needs of local people and improving equality of opportunity.

5. Background Papers

Equality and Human Rights Commission Guidance: <u>Annual reporting, publishing and Ministerial duties</u>: A guide for listed public authorities in Wales

Stonewall's 'What's it got to do with you?' leaflet.

Welsh Government <u>'2012 - Collecting Equality Data and Harmonised Standards Best Practice</u>' guidance.

<u>Equality and Human Rights Commission's Technical Guidance on the Public Sector Equality Duty Wales</u>



The Vale of Glamorgan Council's Annual Equality Monitoring Report 2018 - 2019

You can ask for this document in other formats.

For example: larger font; on different colour paper.

You can ask for this document in Welsh.

You will find a Welsh version on our website.

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Introduction

We must report on progress towards meeting our equality objectives and other equality matters every year by 31 March for performance in the previous year. This report tells you about our equality work between April 2018 and March 2019.

We do this to meet our duties under:

- the Equality Act 2010;
- the Public Sector Equality Duty (known as the 'general duty'); and
- the specific duties for Wales.

We tell you how we have collected and used information to:

- · eliminate unlawful discrimination;
- · advance equality of opportunity; and
- · foster good relations.

We also tell you about:

- how we are getting on with our equality objectives;
- · the people we employ; and
- other equality work.

Background

We have described our main equality work in our Strategic Equality Plan.

We agreed this plan in March 2016. It is based on our original plan from 2012. There were a number of things we had to do to develop the first plan. We list the main steps below.

- We looked at how much information we had on the people using our services. We especially wanted to know which protected groups were using our services.
- We met with local organisations to see if there were areas that we could work on together.
- We looked at other plans to see if they had actions that needed to be in the Strategic Equality Plan. These plans included the Corporate Plan and the Equality and Diversity Scheme.
- We arranged events for us to meet with other organisations that have an interest in the needs of protected groups. We went to their meetings if they could not come to ours.
- We consulted with the public, staff and trades unions.
- We talked to people about what our priorities should be.

This helped us to decide on our equality objectives. These are an important part of the Strategic Equality Plan.

We consulted people again towards the end of 2015 to help us decide how to update the plan. The main message was to keep working on the areas we are already working on. We have developed these using more recent research such as 'Is Wales Fairer' by the Equality and Human Rights Commission. We have also made links with our Corporate Plan.

To make sure we achieve the equality objectives, we put actions in service plans. These plans guide the work of each service area (such as Housing, Visible and Social Services). Each service has to monitor progress with these actions and report on this.

The Leader of the Council leads on equality issues. Directors take the lead in their own service area.

We find out about the latest issues and guidance in a number of ways, including through the Equality and Human Rights Commission network.

Steps taken to identify and collect relevant information

We have been collecting information about who uses our services for some time. We have not always done this in the same way across the Council. Also, we have not always collected data on all protected groups.

For this reason, in 2011, we devised a new form and spoke to managers to explain the importance of using it. We encouraged services to improve how they use this information to help them plan their work to better meet people's needs. We continue to do this.

When we started, we looked at information from key services:

- Libraries;
- Housing;
- Public Protection;
- Housing Benefit; and
- Social Services.

In this year's report, we report on the following services:

- Housing Solutions
- Supporting People
- Housing Benefits and Council Tax Reduction

- Revenue and Benefits
- Shared Regulatory Service
- Children and Young People's Partnership Team
- Communications
- Additional Learning Needs and Wellbeing, Learning and Skills
- Library and Information Service
- Adult Community Learning
- Vale Courses, Adult Community Learning
- Children and Young People Services, Social Services
- Adult Services, Social Services
- Registration Service
- Regeneration and Planning Barry Island, Cosmeston, Heritage Coast, Disabled Facilities Grant
- Corporate Complaints

When we look at the information gathered, we consider:

- the data gathered over the last few years;
- the systems used to gather the data; and
- how Services use this information to make improvements.

This helps Managers to identify gaps in the information and take appropriate action.

To clarify why Managers need to collect the information, we use guidance from Stonewall. You can see the guidance in <u>Appendix 1</u>. The form we used to gather information is in Appendix 2.

You can find the equality information that Services have collected in <u>Appendix 4</u>. Each Service says how it has used the information to meet the three aims of the general duty.

The form we use to gather information for this report, encourages Services to show how they have used the information to make improvements to services.

Reasons for not collecting relevant information

Some of the reasons for not collecting information include:

- staff asking users for personal information face-to-face;
- users not wanting to complete another form as well as sometimes long application forms;
- concern that limited surveys do not reflect a true picture;
- not having systems to collect the information.

We encourage managers to explain how important this information is in improving services.

Statement on effectiveness of steps taken to fulfil each of our equality objectives

Here is a short outline of how we developed our original objectives. You can find full details of this in our first Strategic Equality Plan.

 We used national research to help us understand the issues. For example, we looked at 'How Fair is Wales', and 'Not Just Another Statistic' reports. The Equality and Human Rights Commission produced these reports.

- We looked at whether we had any information in the Council to tell us more.
- We talked to groups who know about the interests of protected groups.
- We consulted with our own staff and the public.
- We agreed the equality objectives that we would work on for the next 4 years.

To review our objectives, we looked at more recent research such as 'Is Wales Fairer' by the Equality and Human Rights Commission. We also carried out engagement and consultation.

Following this, we agreed our equality objectives. We show what work we have done on these below.

Equality Objective 1:

Collect and analyse service data by protected characteristic so services meet the diverse needs of the public

What we have done?

We have increased the number of services collecting and analysing data by protected characteristic. For this reporting year, we have data and information on sixteen different service areas, a significant improvement on our starting point of five service areas.

What we have learnt?

Services look at this information to see how they can improve services for people in protected groups. Services are also able to use this information when they are thinking about the equality impact of changes to their services.

What are the challenges?

There can be a range of issues that affect whether Services collect and analyse data on protected characteristics of its service users.

Sometimes Services don't have the systems to collect information and this can be resource intensive to resolve.

Staff can be reluctant to ask people for this kind of information, even though this information is confidential, particularly where they feel monitoring questions are very personal. They do not always understand how asking such questions can help to: develop services so that they meet diverse needs; and remove barriers to people using their services.

When service users are completing forms to access a service, they can be reluctant to complete an additional form with more information. This again can deter Services from asking for equality information.

What do we need to do?

We need to continue to promote to Services and the public the reasons why we collect this information and how it can be used to their benefit.

We need to help Services to better analyse this information and use it to make improvements for protected groups.

Equality Objective 2:

Close attainment gaps of children in protected groups

What we have done?

Our focus has been on the attainment of the following groups: Gypsy, Roma, and Traveller Pupils; children who are looked after by our local authority; children with additional learning needs; pupils eligible for free school meals; and pupils learning English as an Additional Language.

What we have learnt?

Generally, performance outcomes have been good and compare well with peers across Wales.

What are the challenges?

Attainment levels need to be regularly monitored and appropriate action planned to support improvements.

What do we need to do?

A gap still exists for pupils eligible for free school meals and narrowing this remains a priority.

School Exclusions

What we have done?

Alongside the Council's schools, the Behaviour Improvement Team, the Youth Service, the Educational Psychology Service, and the Autistic Spectrum Disorder Outreach Team from Ysgol y Deri all work to support pupils who may be at risk of exclusion.

What we have learnt?

There was a slight decrease in exclusions of pupils with special educational needs and a slight increase in exclusions of pupils with English as an additional language. More boys than girls were excluded. Boys are approximately 4 times more likely to be excluded than girls.

In secondary schools, the percentage of pupils with special educational needs that were excluded reduced by more than 10% between 2016/17 and 2017/18. Rates of other groups remained similar over the same period.

In primary schools, the percentage of pupils with special educational needs who were excluded increased by nearly 10% between 2016/17 and 2017/18. The proportion of pupils with English as an additional language who were excluded nearly doubled over the same period.

What are the challenges?

The percentage of vulnerable pupils excluded from Vale mainstream schools has remained consistent over the last 2 years. However, exclusion rates have increased for certain groups as described above. For example, the proportion of pupils with English as an additional language who were excluded nearly doubled.

What do we need to do?

Partnership working between schools and the appropriate teams needs to continue to minimise exclusion rates as much as possible, particularly for groups where exclusion rates are higher.

Equality Objective 3:

Make public documents easier for people to read and understand

What we have done?

The Council raises awareness of plain language guides. A plain language and style guide is available for staff to refer to on the Council's intranet. There is also a guide to grammar, a plain language dictionary, and a guide to punctuation.

An e-learning module covers the essentials of plain language. It provides information on planning in advance, avoiding complex language, being clear and shows examples.

What we have learnt?

There are Services which use Easy Read documents, as well as writing in plain language. These services include Social Services, Disability Sport, Shared Regulatory Services, Housing Benefits and Council Tax Reduction, Revenue and Benefits. Where Services have identified a particular need, they are more likely to think about how they communicate with service users.

What are the challenges?

It requires more thought to write in plain language and is a skill which people need to develop. When staff are under other work pressures, it can be difficult to find the time to develop these skills and to write more plainly.

What do we need to do?

We are developing a core competency framework. We have a communication competency which will include using plain language. Assessment against this competency will take place during the appraisal process. There will be support for further learning where required.

Equality Objective 4:

Help staff know more about equality law, and staff and the public to understand the needs of protected groups

What we have done?

We continue to offer equality awareness training. This includes general awareness raising, equality impact assessment training, and raising awareness of the needs of specific groups such as the deaf community. E-learning training modules are also available covering topics such as equality awareness, equality impact assessments, and transgender awareness.

We use events such as Black History Month, LGBT History Month, and World Mental Health Day to raise awareness of issues within the workforce. We do this by putting articles about these events on our intranet, explaining what they are about and the part that staff can play in making a positive difference.

We have set up a network for lesbian, gay, bisexual, and trans staff and allies called GLAM. GLAM regularly marks occasions such as: LGBT History Month; IDAHOBIT (International Day Against Homophobia, Biphobia, Intersexism and Transphobia); Bi Visibility Day; and Transgender Day of Visibility.

We raise public awareness through social media, events, and working with other organisations. We have featured issues such as mental health, sexual orientation, gender identity and disability.

What we have learnt?

Training helps our staff to understand the issues that people with protected characteristics face. Staff have been positive about the training. It helps them understand how to provide services that meet the individual needs of service users.

What are the challenges?

It can be difficult for staff to take time away from their jobs to attend training or events and to complete e-learning modules. This is particularly the case for front-line workers.

What do we need to do?

We have reduced the length of training courses to two hours rather than day long. This helps managers to release staff for training.

Some staff can now access e-learning modules from their own devices where they do not have access to a computer in work. We need to make this available to more staff.

We need to make the e-learning modules mandatory to staff who have access to them to make sure that more staff have had equality training.

We need to review our induction process to ensure that staff have knowledge of equality issues from the start of their employment.

Equality Objective 5:

Seek the views of protected groups on proposed changes to policy, budgets and services

What we have done?

An equality impact assessment process in place. This has been reviewed and relaunched, with links to guidance, examples, and research to help officers carry out effective assessments.

The Council's Communications Team provides advice on engagement to Services. The Communications Team keeps a list of organisations that we can talk to about the needs of protected groups to assist in this process. This helps services to find out about the views and needs of protected groups so that these shape policies, decisions and services.

We carry out extensive engagement and consultation on important plans and policies such as the Corporate Plan, the Budget and the Strategic Equality Plan.

We have an Equalities Consultative Forum comprising a range of organisations representing the interests of protected groups. It meets twice a year and provides an opportunity for an exchange of information on equality issues.

What we have learnt?

When we engage with protected groups, they give us lots of information on what they want from our services and how they could be improved to better meet their needs. We are able to use this information to inform our plans and policies.

What are the challenges?

It can be challenging finding groups to engage with that represent the interests of all protected groups.

Engagement is time consuming and it can be difficult to find the time and staff resources to engage with a range of protected groups. There is also pressure on a relatively small number of groups to respond to requests to engage and consult.

What do we need to do?

We will continue to keep under review local organisations that are able to engage with us on proposed changes to policy, budgets and services.

We will promote to Services the importance of talking to service users at an early stage of their proposals to ensure that their views are considered and service changes take account of this information.

Equality Objective 6:

Encourage people with protected characteristics to report hate crimes, harassment and discrimination

Community Cohesion

What we have done?

The Council coordinates a Community Cohesion Group with members from the community and representatives from the Community Safety Team, South Wales Police, and the Police Youth Volunteers. It meets quarterly to monitor and respond to tensions in the Vale as part of a multi-agency partnership.

The Community Cohesion Group looks at reports on hate crime every three months. These reports include information on protected characteristics. They also have data and case studies on anti-social behaviour, stop and search, and the use of force. The Community Cohesion Co-Ordinator and the Hate Crime Officer meet regularly to monitor tensions in the community.

The Regional Community Cohesion Co-Ordinator provided feedback to the All-Wales Race Equality Forum regarding the Welsh Government's future race-related hate crime fund. The Co-ordinator worked collaboratively with eligible organisations to develop local bids to ensure victims of hate crime are supported appropriately.

The Vale of Glamorgan and Cardiff CONTEST (Counter Terrorism) Boards have merged. The CONTEST Board makes sure that key officers understand potential community tensions and trends concerning extremism. In summer 2018, the Board agreed to develop a regional 'Channel' process. 'Channel' is an early intervention multiagency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. 'Channel' works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

What we have learnt?

It is important to work in partnership with other organisations and with the community. Action has been taken to promote this type of working.

The Community Cohesion Group has put in place a development plan and uses online and social media platforms to get information about what is happening in the community. It has made links with new partner organisations.

The South Wales Hate Crime Officer has delivered outreach sessions in schools and prisons to promote awareness of hate crime and how to report incidents.

The regional 'Channel' process will help to share expertise across the region and support the exchange of resources and information. In turn, this will develop a better understanding of regional trends.

The Regional Community Cohesion and Community Engagement Unit supported Glamorgan Cricket to secure funding to deliver workshops for young people. They received funding through the support of the Counter Extremism department of the Home Office, under their 'Building a Stronger Britain Together' programme. This has resourced a series of 'Beyond the Boundaries' workshops, focusing on a range of themes connected to hate crime, human rights, and extremism.

What are the challenges?

The challenge is to maintain a current awareness of issues in the community and to develop and deliver appropriate responses.

What do we need to do?

Between 2019 and 2021, the Community Cohesion Group's work to prevent hate crime within the Vale will be further developed by the newly appointed Cohesion Officer, based in the Community Safety Team at Barry Police Station.

The Community Safety Team will continue to work in partnership with other organisations and the community to keep informed and to respond appropriately to community cohesion challenges.

Anti-bullying in schools

What we have done?

The Council works with our schools to reduce bullying. We focus on vulnerable groups who are more likely to be victims of bullying. We have achieved this by:

- providing schools with a wellbeing 'capacity building tool' with good practice to deal with bullying;
- monitoring bullying incidents school by school;
- sharing this information with Challenge Advisers;
- monitoring bullying incidents by protected characteristics;
- developing a model anti-bullying policy which all schools have adopted;
- support and challenge visits to schools to look at data, with review visits if necessary;
- suggestions for activities for anti-bullying week;
- safeguarding training to all schools, including information on bullying and on-line bullying;
- development of a Transgender Toolkit to provide guidance to schools on the risk of bullying for this group of young people, outlining how schools can prevent this.

These elements have a clear focus on children and young people feeling safe in schools.

We collect and monitor data on the number of incidents of bullying by protected characteristics to identify if there are trends that we need to deal with.

Show Racism the Red Card and Stonewall Cymru have delivered training which highlights that children and young people often have a number of protected characteristics and that this increases vulnerability to bullying.

What we have learnt?

We have not identified any trends from the current data which need action. This provides assurance that the range of interventions in use are working. However, we recognise that national and UK data shows that certain groups are more at risk of bullying:

- pupils with Additional Learning Needs;
- disabled pupils;
- lesbian, gay, bisexual and transgender (LGBT) pupils;
- ethnic minority pupils;
- pupils from a religious background.

The support the Council has provided to schools has helped them to support children and young people. The schools' inspectorate, Estyn, has recognised this. Of the schools it inspected since 2016, Estyn rated 98% of them as either good or excellent for Wellbeing and Care Support and Guidance.

What are the challenges?

The challenges have been as follows:

- ensuring that all schools complete the bullying return on a termly basis;
- developing a common understanding of what constitutes bullying;
- our capacity to monitor anti-bullying procedures in schools;

• the number of reported incidents of identity-based bullying is low.

What do we need to do?

The Council will continue to work closely with schools so that there is awareness and they take measures to deal with bullying.

We will seek to develop the training and awareness raising programmes in schools using organisation such as Show Racism the Red Card.

Develop new model anti-bullying policy for schools in consultation with young people.

Equality Objective 7:

Find new ways of reaching victims of domestic abuse and raise awareness of domestic abuse services in the community

What we have done?

We work in partnership with the specialist domestic abuse services - Atal Y Fro and the Council's Supporting People Team. Together we ensure that victims of domestic abuse have access to help, support, and protection. This includes: refuge, second stage and dispersed housing; and counselling access to relevant programmes, including outreach support.

We signpost to specialist services when required such as:

- Bawso generic and specialist services for the Black and minority ethnic communities for those affected or at risk of domestic abuse and all forms of violence such as female genital mutilation, forced marriage, honour based violence, human trafficking and modern slavery;
- Safer Wales Dyn Project provides support to heterosexual, gay, bisexual and trans men who are experiencing domestic abuse from a partner;
- Rainbow Bridge a Victim Support run service that specifically supports victims of domestic abuse who identify as lesbian, gay, bisexual and transgender;
- Live Fear Free a Welsh Government service providing help and advice about violence against women, domestic abuse, and sexual violence.

We submit quarterly and annual reports to Welsh Government on the Regional Delivery Plan. We report on progress with the Cardiff and Vale Regional Violence Against Women, Domestic Abuse & Sexual Violence Strategy 2018- 2023. This report includes

information on protected characteristics. We also report to the Community Safety Partnership.

Atal y Fro advertises its services through social media, press, and awareness training events. It works with statutory and third sector organisations to ensure their services are advertised to as many people as possible including the rural Vale.

The Council actively supports the work of the Vale 50+ Forum to increase visibility and services across the Vale of Glamorgan.

What we have learnt?

It is important to raise awareness of domestic abuse throughout the community. We do this by holding training, awareness raising days and activities. We widely advertise these across the Vale of Glamorgan.

For example, campaigns and awareness events are run throughout the year and are targeted around certain events in the calendar such as the White Ribbon campaign, International Women's Day, 16 days of action, PRIDE, Safeguarding Week.

We focus on relevant topics about violence against women, domestic abuse, and sexual violence. We promote these campaigns in a variety of ways: face to face; by engaging service users; holding conferences; using social media, radio, television and the press. Information will also be on leaflets, letter heads, and emails.

What are the challenges?

It is challenging to maintain awareness across the community so that people know where to get advice and support when they need it.

It is also a challenge to maintain the resources needed for a range of support programmes.

What do we need to do?

The Council has recently worked with Cardiff and Vale Health Board to develop a Regional Strategy for Violence Against Women, Domestic Abuse and Sexual Violence 2018 - 2023. This sets out how partners will shape and deliver responses to all forms of domestic abuse and sexual violence across the region.

The vision is that people who live, work, study in, and visit Cardiff and the Vale of Glamorgan, have the opportunity to live positive, independent lives without being affected by violence and abuse.

Equality Objective 8:

Reduce the gender pay gap and improve employment opportunities for protected groups

What we have done?

The Council has a workforce plan which contains actions to ensure the Council's employees reflect that of the community. This includes actions to reduce the gender pay gap. The gender pay gap has reduced in recent years:

- On 31 March 2016, the gender pay gap was 8.88%.
- On 31 March 2017, the gender pay gap was 8.81%.
- On 31 March 2018, the gender pay gap was 8.01%.
- $\bullet~$ On 31 March 2019, the gender pay gap was 5.48 %

We have developed a report on the pay gap for people from ethnic minorities, including data for the previous year to compare. We will include this information in the Employment Information section of the annual equality monitoring report.

We have made it a priority to attract more young people to work with us as the proportion of young staff that we employ does not reflect the proportion of young people in our community. We use apprenticeships to support this objective. We continue to offer foundation apprenticeships to young people who are 16 - 24 years old. There are 23 apprentices currently in the Council. From April 2017 to March 2018, we employed apprentices mainly on an agency basis. From March 2018, we employed apprentices directly.

We attend school, college, university, and local careers job fairs to promote the range of careers and jobs we have in the Council. Our focus has been on removing the job and career stereotypes and preconceptions that many people have.

We collect data by protected characteristic and report on this annually in our Employment Information Report (Appendix 5).

We collate, report and publish our Annual Employee Pay Policy. This provides a framework to make sure that our employees are paid fairly and objectively and ensures it is an open and transparent process.

We support young people leaving care so they can access work experience and apprenticeship routes to support their continued career development. This has concentrated mainly on improving the employment rates of young people who are underrepresented in our workplace.

We work with young people, older people, redundant workers, single parents, and disabled people. In this context, the Council continues to hold its "Disability Confident" status and works with the local Job Centre Plus to undertake core actions. For example, we provide training and work experience opportunities for people who have protective characteristics and /or who are long term unemployed.

We have worked with Stonewall Cymru to make arrangements for work experience opportunities to young lesbian, gay, bisexual, or transgender person through a Stonewall scheme.

What we have learnt?

We realise that we need to take a range of measures to reduce the gender pay gap and improve employment opportunities for protected groups. We have examples of how we have tried different approaches and the impact of these.

We introduced the Living Wage in April 2016. We enhanced the impact of this by stopping using the lowest pay point of our pay structure. Women in the workforce particularly benefitted from this.

We have used management development and succession planning to support and encourage staff to apply for job vacancies. Most of our Chief Officer appointments were made following a competitive process in which internal applicants were successful. This has resulted in a change in the gender balance of Chief Officers. There is now a more even balance (one more female than male) resulting in a significant change in the gender pay gap.

We have attended school, college, university and local careers job fairs to promote the range of career and jobs in the Council. We have focused on removing job and career stereotypes and challenging people's ideas about the sorts of jobs open to them.

We have revised the appraisal system - #itsaboutme. This provides an opportunity for staff to put forward ideas about developing their potential. They can explore development opportunities for themselves that will fit with business needs. This is complemented by the Council's Leadership Café which promotes the personal development of employees, helps them to network and to break down barriers.

What are the challenges?

It is difficult to quickly bring about change in these areas. It requires sustained effort over a long period of time. We will continue to monitor and address pay gaps and aim to build a workforce that is representative of the local community.

What do we need to do?

We will continue to monitor and report on the gender pay gap and the pay gap for people from ethnic minorities. We will take appropriate action to address pay gaps that we identify.

We will continue our work to attract under-represented groups to apply for Council jobs. In particular, we will continue to focus on attracting more young people to work with us so that our workforce better reflects the proportion of young people in our community.

We will continue to use management development and succession planning to support the development of our staff so that they are in a good position to take advantage of career development opportunities.

Other matters relevant to the general duty and specific duties

You will see in Appendix 4 that there are a number of ways in which services have collected data and promoted equality.

In addition to this, we report on other matters that help us to promote equality below.

Equality Impact Assessments

Contributes to Equality Objectives 1, 4, and 5.

We have had a system for assessing the impact of our work on protected groups for many years. We review and improve it from time to time. We publish the results of our assessments on our website.

In January 2017, we introduced a new process for carrying out equality impact assessments. It links to guidance, research and data. It only allows officers to start the process and they then have to contact the Equality Team for advice. We hope that this will improve the quality of the assessments.

We continue to support managers to think about their work in this way. We provide training on how to carry out assessments. There is an e-learning module for people to learn on-line how to do it. We ask them to show their thinking in a formal record that we can publish.

During the last few years, it has been important for us to think about how budget changes might affect our services. As we prepare budgets, we think about how changes might affect protected groups. We also think about how we can minimise adverse impacts on them. We publish on our website the assessment of how the budget impacts on protected groups.

More recently, we have also had to think about providing services in a very different way. This is because we know that each year, for the next few years, there will be greater pressures placed on budgets. As we do this, we think about how this will affect protected groups and we talk to them about it.

Equality Training

Contributes to Equality Objective 4.

We continue to provide a programme of short training sessions to make sure that staff know about new equality law. We continue to offer e-learning modules. This training covers a few areas. This includes: basic information about equality; how to assess the impact of our work on protected groups (equality impact assessments); and information about transgender issues.

People can look at the e-learning modules using the computer at their desks. They can also access them from home. This can make it easier for some people to do the training. We can monitor who has completed this type of training.

There are some staff who are unable to attend the training sessions and do not have access to e-learning modules. For these staff, we can provide a booklet that explains the key things they need to know.

We also provide other types of training from time to time such as deaf awareness training, and sexual orientation and gender identity awareness training.

Procurement

Contributes to Equality Objective 4.

The Council's corporate procurement process ensures that all procurement processes take into account the Public Sector Equalities Duty and are compliant with statutory legislation. This includes due diligence through tender documentation.

The selection stage of the Council's procurement process has seven scored questions which can become mandatory pass or fail if required. The first question is:

"As an employer, do you have a policy and provisions in place to ensure that your organisation and staff comply with your statutory obligations under the Equality Act 2010, and accordingly, is it your practice not to discriminate directly or indirectly on grounds of age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation in relation to decisions to recruit, select, remunerate, train, transfer and promote employees?

Yes/No"

The award stage of the procurement process can also include equality and diversity requirements for evaluation.

Procurement staff have undertaken the latest equalities training via the Council's i-Dev online learning including the Equalities Act 2010, Trans Awareness Course and Equality Impact Assessments.

Also, Procurement Officers attend the annual Welsh Government Procurex Conference to ensure they are aware of the latest initiatives and best practice on Ethical and Inclusive Procurement.

Within the Council's Procurement Code of Practice, we have reviewed the Contract Management guidance so that it promotes a key performance indicator for general diversity and equality issues. An Ethical Procurement Questionnaire has been created with the aim of sending it to Council suppliers to refresh, remind, and promote diversity and inclusion issues as well as Modern Slavery and the Welsh language requirements.

We are developing guidance on lesbian, gay, bisexual, and transgender diversity and inclusion for the Council's supply chain as a separate document.

Disability Confident Scheme

Contributes to Equality Objective 8.

We are proud to be a member of this scheme. It recognises employers who help disabled candidates into work and support employees if they suffer ill health during their working lives.

Under the scheme, we help people with disabilities in a number of ways.

Accessible interviews

We remove barriers to interviews by providing things like: car parking; signers; Braille; wheelchair access; a loop system; or interpreter.

Prior Consideration

We guarantee an interview to people with disabilities so long as they meet the essential requirements of the person specification for the post.

Interview location

We can arrange for a visit to the interview location before the interview. We can then make adjustments or adaptations before the interview if people need them.

Developing abilities

We make sure that there is an opportunity for people to develop and use their abilities. We do this through our Personal Development Review system, #itsaboutme.

Supporting employees

We support employees to stay in employment if they become disabled. We provide an occupational health service and a counselling service.

Raising awareness

We arrange training to help staff know more about disability. We also advertise our commitment on our Staffnet and on posters in the building.

Reviewing the scheme

We check regularly how the scheme is running and plan improvements. We have been able to trial a job experience scheme and have offered placements to several job seekers. As a direct result of this scheme: at least one person has gained paid employment; and another is gaining relevant training to support their professional qualification and enhance their employment prospects.

Stonewall Diversity Champion

Contributes to Equality Objective 4.

We continued to be a member of Stonewall's Diversity Champions Programme. With Stonewall's help, we developed an action plan to improve the workplace for lesbian, gay, bisexual, and trans people. This helps us to make sure that we treat them fairly when they are employees or applying for jobs.

Our work has included setting up an LGBT+ and Allies Network, relaunched in January 2019 as 'GLAM'. Network Members take part in regular meetings related to three different workstreams: workplace impact; visibility and awareness; and social and support. Each group has a number of objectives to achieve to help make the workplace more inclusive for LGBT+ people. This work has involved reviewing policies, raising awareness of issues affecting LGBT+ people, and arranging social events to network and provide support to staff.

We have LGBT+ Champions, and a 'GLAM' (LGBT+ staff network) webpage on our staff intranet.

We take part in Stonewall's Workplace Equality Index. We improved our score by 24 points and our ranking by 78 places.

Show Racism the Red Card Campaign

Contributes to Equality Objective 4.

We continue to work with Show Racism the Red Card. This is a charity that works with young people to raise awareness of racism and homophobia. It uses footballers and other sports stars as role models to do this. It delivers workshops to young people about racism and provides fun fitness sessions.

In 2018 – 2019, there were 35 workshops across 18 Vale of Glamorgan Schools, including:

- 15 primary schools;
- 3 secondary schools;

They met with 1364 children and young people from the ages of 5 to 17. Over 10% of pupils that responded to a survey had heard or witnessed racism in their school in the preceding 12 months. 24% of pupils who replied from primary schools indicated that they or a friend had suffered from racism in school.

Following the workshops, less than 5% of pupils and no teachers had witnessed any racist incidents, and 65% of pupils stated they had changed the way they treat others. 100% of teachers would recommend the workshops to another school.

After the workshops: the knowledge and understanding of racism amongst primary school pupils went from 43% to 90% rating as good or excellent; and confidence in talking about racism went from 40% to 65% rating as good or excellent.

In a follow up survey three months after the workshops, all teachers agreed that their confidence in delivering anti-racism education had increased, and all rated the workshops as excellent or good. Here are some of the comments they made when asked whether the workshop would affect attitudes:

'Yes. The pupils have shown more empathy and understanding of the issue.'

'I think it raised awareness, especially of the possibility of inadvertently being racist.'

'We have continued the topic in my class and the students have good recollection of what they had learnt during the workshop.'

Show Racism the Red Card visited Jenner Park for an Educational club event with our partnership club Barry Town United FC. Young people from Oakfield Primary attended the stadium to take part in the educational club event for the day.

Pupils were also invited to watch the charity's new educational film which features Ryan Giggs, Dele Alli and Trent Alexander-Arnold among others. In the afternoon, pupils had the opportunity to put their knowledge to the test in an anti-racism press conference.

Barry Town players Jordan Cotterill, Louis Gerrard and Assistant Manager Mike Cosslett were present to meet the pupils and answer their questions. The pupil journalists posed some challenging and mature questions for the players. The pupils used the information from the event to write an article once they have returned to school.

Gypsy and Traveller Reporting Forum and Reporting System

Contributes to Equality Objective 4.

We continued to support a Gypsy and Traveller Forum. The people on the Forum are from services that work with Gypsies and Travellers. These included:

- Cardiff and Vale University Health Board;
- Community Safety;
- Social Services;
- Environmental Health;

- Estates;
- Legal Services;
- Pupil Support services;
- South Wales Police Minority Support Unit.

The group made sure there were systems in place to support Gypsies and Travellers when they arrived in the area. There was a system to report new arrivals, assess welfare needs, and share information.

We monitored our site reporting system. When officers found out that there was a new Gypsy or Traveller site, they reported it to our Contact One Vale contact centre. We shared this information with the other members of the group.

Our Housing Department makes first contact with Gypsy or Traveller families when they arrive in the area. They find out about matters such as welfare needs and length of stay. It gives this information to our Contact Centre to pass on to members of the Forum.

During 2018 – 19, we continued to keep membership under review to make sure we knew which people to contact in each organisation. This allowed us to continue working well when there were matters we needed to deal with.

Integrated Autism Service (previously Adult Autism Advice)

Contributes to Equality Objective 8.

The Integrated Autism Service is a multiagency team of local authority and health staff covering the Vale of Glamorgan and Cardiff. It provides diagnosis and support for adults with autism. The team began in 2012 and developed into the Integrated Autism Service in 2017. The Team gathers information about available services. These services come from local authorities, external service providers, and third sector organisations. The

team then supports clients to access these services and provide more targeted support if there are barriers.

This work helps clients to access support or opportunities available to them in the wider community. Without this low-level support, they may not have known about these support opportunities or they may not have felt able to access them. The short-term, targeted interventions encourage people to be independent and to avoid becoming dependent on the Team.

This work helps us to deliver preventative services that meet the requirements of the Social Services and Well-being (Wales) Act 2014.

As well as providing support and signposting to access other opportunities, the Team provides a range of groups and workshops. Currently these are:

- a training workshop, Socialeyes, for people to develop social skills;
- · monthly discussion groups for adults in Barry and Cardiff;
- a group for adults with autism to learn basic coping skills this 'Skills for Life' course includes nutrition and a range of domestic tasks;
- a post diagnostic group where adults learn about the condition they have been diagnosed with and how it may affect their lives;
- a "Get Cooking" course run with the dietetics team to support autistic adults to prepare healthy cost-effective meals.

Vale 50+ Strategy Forum

Contributes to Equality Objective 5.

The Forum speaks up for the needs of people aged fifty and over in the Vale of Glamorgan. Its members are in contact with many local and national working groups. The Forum has a

constitution and an elected group of members called an Executive. The Executive decides how the Forum works.

The Executive meetings are open for all Forum members to attend. By attending, members can benefit from a range of interesting presentations on available services. Members also have the opportunity to express their opinions on service developments and planning.

There are five task groups working to make sure that people over fifty are able to have access to good health, transport, housing, care, and arts and crafts group. They try to make sure that people can learn new skills and do fun things to suit their needs. The Forum talks to the Council, Health Board, and voluntary organisations about the services they provide. The Forum also holds events every year.

The Council works closely with the Forum and has signed a Memorandum of Understanding with the Forum. The Council gives a small grant to the Forum for members' expenses and to pay for activities and events. The Forum uses the grant for:

- a magazine that has useful information for older people;
- a website;
- buying equipment like printers and tablets for Forum business and to teach older people how to use computers, tablets and smart phones; and
- out of pocket expenses.

From time to time, the Council and other organisations want to know what people think about their plans. To help to find out what people need, we plan different activities including talking to the Forum.

Forum Events

Age Cymru is a charity for older people. It set up an annual national arts festival called Gwanwyn. Gwanwyn is Welsh for the season of spring. It is held in May each year for older people to enjoy the arts. The Forum is actively involved in the event.

The Forum is also actively involved in events to tackle elder abuse, celebrate International Older People's Day, and to promote health and well-being.

Publicity

Every year, the Forum publishes a magazine called 'The Herald'. It tells people about the Forum's work and things of interest to people over 50 years of age. There are also items on services and leisure activities. Forum members produce this magazine.

The Forum also has its own website. This <u>website</u> gives access to social media sites and has been developed by a member of the Forum.

Supporting other projects

Members of the Forum have trained to be 'digital champions'. This means that they:

- teach people about on-line safety;
- how to use laptops, tablets and smart phones, including e-mail and the internet.

Some Forum members have trained to be Dementia Friends Champions. They volunteer to do this. They encourage others to help people with dementia live in the community. They give them information about what dementia is, what it is like to have dementia, and what they can do to help.

Members of the Forum have been on the Age Cymru LIFT course. LIFT is the name of an activity programme. Its aim is to get older people active in their local community. The trained Forum members can now offer weekly exercise sessions. A range of community groups can attend, including people with dementia. One of these Forum members has created a toolkit to help people avoid falling. He runs sessions on preventing falls to groups throughout the Vale. This member has also qualified to offer the Age Cymru Tai Chi sessions to older people.

Forum members have trained to be advisors for Llandough Hospital Information Centre. Forum members who are on the executive group have had training to be health and well-being advisors. They work to 'to make every contact count' (MECC). They promote healthy living, screening, and vaccination services. They also work as high school mentors.

You can join the Forum if you are over fifty and live, work or volunteer in the Vale of Glamorgan.

Arts Development

Contributes to Equality Objective 4.

The Arts Development Service, including Art Central Gallery, runs an inclusive programme of opportunities activities, exhibitions and events. This work is guided by its Arts and Culture Strategy, 'An Aspirationally and Culturally Vibrant Vale 2017 - 2022'.

The arts have an important role to play in the health, wealth and happiness of residents and visitors to of the Vale. The Arts Development Service supports a diverse range of individuals, groups, organisations and events including the Romani, Gypsy, Traveller community, the Women's' Arts Association, the Vale 50+ Strategy Forum, Cardiff and Vale College and Vale Schools, and Holocaust Memorial Day. It targets underrepresented artists and promotes their work through exhibitions and events.

Here are some examples of these exhibitions and events:

Holocaust Memorial Day Exhibition

We have held an event for Holocaust Memorial Day on 27 January each year since 2001. The Holocaust and genocides that followed still make us ask difficult questions. We asked visitors to think about what happens after such events. We wanted people to think about what we see and need to do today, encouraging people to think about sometimes personal and wider world challenges.

Women's Arts Association Exhibition

International Women's Day has been marked every year across the world on 8 March since 1911. We hold an open exhibition of work from the Women's Arts Association. This group brings women artists together so that they feel less isolated. The exhibition celebrates diversity by showing a variety of art work by women from across Wales.

Romani Culture and Arts Company (RCAC) Gypsy Maker Project

The Romani Cultural and Arts Company runs a ground-breaking 'Gypsy Maker' project and other initiatives. These initiatives employ artistic excellence and experimentation to challenge discrimination and advance the education of the public in Gypsy, Roma and Traveller culture. The Company works in partnership with other organisations to support the development of innovative works by established and emerging Gypsy, Roma and Traveller artists.

For a number of years, it has worked with the Art Development Service to exhibit significant artists from this community at Art Central Gallery. With the support of the Arts Council Wales, over the past five years it has staged a total of nine exhibitions comprising: 247 exhibition days with more than 15,000 visitors; and 27 workshops and eight talks that 550 people attended.

Mixing it!

This was an historical exhibition by Bryn Hafren and Barry Comprehensive Schools. It marked the change from single sex schools to the co-educational establishments they are today. The exhibition brought the two schools together to show the talents of the pupils and enable them to display their work in a professional gallery. The work addressed issues of mental health, the effects of social media, war, and other issues that impact on young people today. With a mix of GCSE and A level work, the gallery celebrated the multi art skills of students through photography, ceramics, painting, collage, film and 3Dimential design works.

Cardiff & the Vale College End of year show

This was an exhibition of art work by upcoming artists studying in Cardiff and Vale College. It showed an impressive collection of art and design work. The subject matter explored many issues that affect society today such as addiction, mental health, and disability.

The Arts Council of Wales' 'Night Out' Scheme

The Arts Council of Wales' 'Night Out' scheme works in partnership with local authorities. It helps groups of volunteers across Wales to bring the arts to the heart of their communities. This contributes to the local and the arts economy by providing a platform for performers to reach local communities.

Working in conjunction with the Vale of Glamorgan's Arts Development Service, the 'Night Out' team offers advice and support for accessing high quality shows suitable for small community venues. The scheme enables communities and people on low incomes to access professional, high quality theatre in a local community centres, village halls or other non-traditional venues.

Leisure Services

Contributes to Equality Objective 4.

We provide play and sports schemes and events through our Sports and Play Development Team.

Play

Families First Holiday Club

In school holidays, we provide the Families First Holiday Club. There are two schemes in this club: a disability playscheme for 4 - 11 year old children; and a Teenscheme for 12 - 18 year old young people. These schemes are run for children and young people with a disability, complex needs, or challenging behaviour.

The disability element of the Welsh Government Families First Grant is the main funding for this project. The project takes place in Ysgol Y Deri.

The scheme needs specialist services including: one to one support; personal care; a nurse to administer medication; transport; and specialist equipment. Where possible, the Play Team will support children, young people, and families to get the support they need to attend the project.

Playschemes and Play Rangers

During the summer holidays, we run Playschemes and Play Rangers in local communities. The schemes take place in spaces such as community centres, parks and open spaces. We run them on an open access basis for children and young people aged 5 -14 years.

To run these schemes, we mostly use funds from Town and Community Councils, United Welsh Housing, section 106 funding, and Council funding.

The Play Ranger project is delivered in local parks and open spaces to encourage children and young people to use the various parks across the Vale.

Special Events and Family Fun Days

The Play team supports partners and organisations to deliver special events and family fun days across the Vale.

The events include: the Vale of Glamorgan Show; Eats Beats and Treats; Kids Day Out; the Rotary Club; and the Barry Island Weekender.

To deliver these events we work with: the Vale Events Team; the Family Information Service; the Foster and Adoption Team; Communities First; Safer Vale Partnership; and local communities.

Sports Development

The Healthy Living Team runs a number of inclusive programmes. We target groups of people with protected characteristics and groups of people where there is evidence of low participation. We are proud of the fair opportunities we provide through partnerships and joint working. Here is some further information about each project.

Junior Sport Programme

The aim of the Junior Sport Programme is to get more children of primary school age taking part in sport. It also helps to improve basic skills. This includes balance, coordination, agility and spatial awareness.

The programme encourages children to take part in fun sports sessions and physical activities after school and in the community. Where we can, we make links between schools and local communities so that pupils can be active outside school hours.

We want children of all abilities to take part in the activities. The Sports Development Team uses its knowledge to make this possible. The Team provides awareness training to other people involved in delivering activities.

Every school in the Vale has an opportunity to take part in the Junior Sports Programme with the support of the Sports Development Team. This includes mainstream schools which have disabled pupils and Ysgol y Deri. Ysgol y Deri provides for a diverse range of differently able pupils.

As part of the Junior Sports Programme, there is a primary school sport festival calendar. We invite schools to take part in fun tournaments and non-competitive festivals. At certain festivals, we aim to involve children and young people who are inactive or who do not usually get an opportunity to represent their school.

Here is a list of some of the opportunities that took place in the Vale.

Vale wide Cricket Festival

- Cross Country Championships
- Vale Wide Primary Schools' Netball Festival
- Vale Quad Kids' Festival (Athletics)
- Year 1 and 2 Multiskills Festivals
- Year 3 and 4 Multiskills Festivals
- Year 5 and 6 Multiskills Festivals

'5 x 60' Scheme

The '5 x 60' Scheme is for secondary school pupils. It offers them opportunities to take part in sport or physical activity during lunchtimes and after school. The aim of the scheme is to get more young people involved in physical activity, especially those who are inactive or hard to reach.

We provide a range of activities in each secondary school throughout the Vale. We consult with children to find out what activities they want to participate in.

Each secondary school in the Vale will have sessions specifically targeting one or more of the following groups: girls, young people with disabilities, and certain year groups.

As well as specific sessions, the '5 x 60' scheme in the Vale prides itself on creating inclusive environments where anyone can attend. This includes girls, pupils with disabilities, and Black and minority ethnic pupils. They feel more at ease taking part in physical activity as they have the support of the Active Young People Officer and the Activity Co-ordinator in that school. All sessions are free so money is not a barrier to taking part.

The '5 x 60' Scheme also provides access to a range of festivals and competitive opportunities which include Girls' Football, Girls' Rugby, Badminton, Netball, and many more.

Leadership

Young Ambassador Scheme

To go alongside the Junior Sports Programme and '5 x 60' Scheme, the Healthy Living Team has created a strong leadership programme for children and young people in the Vale of Glamorgan.

We recognised that pupils in primary and secondary schools could take on a large amount of responsibility to shape how sport and physical activity looks in each of their schools. Through these findings, the Young Ambassador Scheme has flourished.

Young Ambassadors aim to:

- increase participation and healthy lifestyles;
- promote the positive values of sport;
- be an ambassador, role model and young people's voice for physical education (PE) and school sport.

In primary schools, we have identified Bronze Young Ambassadors and helped them to develop appropriate skills to do the job. They must meet standards by the end of the school year. This includes options that will improve physical activity levels in the school. The Ambassadors can act as a pupils' voice so that the school listens to their ideas and acts on them.

Pupils in secondary schools can apply to be Silver Ambassadors (Year 9) and Gold Ambassadors (Year 10 upwards). They have more complex standards to meet. They also take on more responsibility. This year one of the Silver Young Ambassador recruited was a looked after child.

The standards for each level of Young Ambassador include actions on how the school can become more inclusive. The standards target specific groups and provide more opportunities for them.

The Young Ambassador Scheme prides itself on being fully inclusive and offering all pupils the opportunity to apply for the scheme. Each primary school can nominate one boy and one girl to promote equality. Numerous pupils with disabilities and pupils who are Black or from a minority ethnic background have been successful in representing their school as a Young Ambassador.

Coaches of the Future Scheme

'Coaches of the Future' is part of the Vale of Glamorgan's Olympic legacy programme to help inspire a generation of participants and coaches.

The programme aims to introduce people to coaching and volunteering in sport, dance, and other physical activities. It provides training and hands on experience of coaching in schools and / or the community.

The Scheme has been running for several years. It has seen a number of coaches completing the scheme, including people with protected characteristics that have been less represented in the past.

Leaders' Courses

The Vale Sports Development Team offers a range of leadership courses for potential coaches. We can modify these to suit the learner's needs. Many people have attended these courses over the past year, with a wide variety of learners attending.

Disability Sport

The Vale of Glamorgan Sports and Play Development Department is Insport Bronze accredited and working towards Silver accreditation. The Team showed commitment to being inclusive in its policies, plans, and programmes of activity. Insport is a national programme for Sport Development Departments in every local authority. It helps them to showcase how their programmes are open to a diverse range of people.

The Disability Sport Wales Development Officer post is a part time role. We receive grant funding to support this role. The aim of the role is to work with partners and

organisations to increase the amount of disabled people taking part in sport and physical activity. Partners and organisations work with the Disability Sport Wales Development Officer. These include schools and community clubs. The Disability Sport Wales Development Officer can offer advice on ways to be inclusive.

The officer can also help people to develop skills to lead disability sport activities. We have run Disability Awareness courses. These range from: Disability Inclusion Training - Active Kids for All (school staff); Autism Awareness Training for Sport Leaders; and an initiative for primary school pupils known as Mini Disability Inclusion Training.

There are 63 different types of sport clubs and groups that offer sport opportunities for a diverse range of people, including those with disabilities. A number of these clubs have achieved Insport Clubs Accreditation during 2018 / 19:

- 4 Clubs have achieved Silver Standard;
- 4 Clubs have achieved Bronze Standard;
- 9 Clubs have achieved Ribbon Standard.

We run Swimability Lessons in Barry, Penarth and Llantwit Major Leisure Centres. These lessons teach swimming to children from the age of 5.

We work with the Disability Sport Wales Talent ID Programme. We have identified talented athletes and passed on this information to the Talent ID Officer. The scheme offers these athletes high class training, mentoring, and additional advice.

The Vale of Glamorgan Sports and Play Development department prides itself on creating opportunities for disabled people to take part in sport. We make sure this happens in an environment that suits a range of individual needs.

A new project was introduced to the Vale to raise awareness of inclusion in Play and Physical activity amongst Primary aged pupils. 'Admiral Play Together' was delivered within 11 Primary Schools and 3 Scout groups impacting on 1190 pupils.

Women and girls

As part of our sports plan, we have a plan called 'Women and Girls on the Move'. It aims to get more women and girls involved in sport. This is a priority for one of our funders, Sports Wales, and for our own sports plan.

As part of the 'Women and Girls on the Move' project, 1494 women and girls took part in sessions (through 8,858 participations). Opportunities included: Back to netball, school-club links, social running and cycling, rugby, football, dance, and gymnastics developments within girl-guiding. We trained 39 new coaches and leaders to continue to encourage women and girls to get involved in sport.

The School Sport Survey results highlights the up-to-date participation results for girls in the Vale. These results have highlighted that the gap between male and female participation in school sport has decreased, a positive sign that interventions are having an impact.

BAME community

Anyone can join in our sports activities. However, some of our activities have particularly attracted individuals from Black, Asian, and minority ethnic groups. This includes the Girls' Club run at St Cyres Comprehensive School. The girls feel more comfortable taking part in activities where boys are not involved.

Welsh language

As part of the 5 x 60 Scheme, we run activities at Ysgol Gyfun Bro Morgannwg. There were 3800 participations through the 5 x 60 scheme for Welsh speaking pupils. Just under 50% of these were by girls. Welsh speaking primary schools are also part of the Junior Sport programme. There has been a decrease in participation due to difficulties in recruitment of Welsh language coaches.

This is complemented by the work of Menter laith Morgannwg. Menter laith Bro Morgannwg provides a range of community activities to promote the use of the Welsh

language across the Vale of Glamorgan. These include a holiday play scheme, a range of weekly clubs and activities for families (story time, baby sensory, music tots) and children (drama, swimming, sports), seasonal family walks and open access play "Bwrlwm".

Bwrlwm is a free, open access play opportunity delivered in a variety of locations across the Vale that enables children who don't have access to speaking Welsh outside of school, to play and socialise with school friends or new friends in a Welsh speaking environment. This enables many children from more deprived communities to access free play during school holidays, and is hugely appreciated by parents. For example:

"It helps parents like myself who don't speak Welsh to have somewhere my child can go to maintain the language during the school break. I can't afford the clubs and I've had to work most of the summer. This club meant my son could have fun while I worked, make new friends and maintain his Welsh. It was a wonderful find for us this summer."

Menter laith Morgannwg was also able to offer a free packed lunch at the end of each session during the October half term break for the children as part of a Welsh Government pilot initiative 'Holiday Hunger'.

Other

As part of the Sport and Physical Activity Plan, we targeted other groups: those living in areas of deprivation; older people; and people living in rural areas. This included 'Older People More Active', 'Doorstep Sports' (Llandough, Rhoose, and Barry) and mental health projects. We also supported existing projects through partnerships with organisations such as Newydd Housing.

Tackling inequality

We manage the Community Chest fund. We get this from Sport Wales. Clubs can apply for money to increase sports opportunities in the community. The clubs can use some of this

money to deal with inequality. This helps to improve opportunities for different groups including:

- people who are Black, Asian or from ethnic minorities;
- women and girls;
- disabled people; and
- people from deprived areas.

Promoting sports

We use pictures of under-represented groups when we promote our sports. We hope this encourages a diverse range of people to join in sports.

Exercise Referral

We run an exercise referral scheme. This is where doctors refer people to us to help them recover from illness or injury. The scheme is open to everyone and attracts significant use from protected groups.

Parks

We are proud that we have ten 'green flag' parks. We have to show a commitment to equality as part of the assessment to get a green flag for a park. We have done different things in different parks to achieve this. Things we have done include:

- improving access for disabled people;
- providing specialist play equipment;
- providing work experience opportunities for protected groups, such as those with learning difficulties.

Electoral Services

Contributes to Equality Objective 4.

To encourage eligible residents of the Vale of Glamorgan to register to vote, the Electoral Registration Team has undertaken various activities to ensure registering to vote to available to all, including:

- #vote100 event raising awareness for women to register to vote and use their vote.
- Equaliteas event workshop sessions with schools, the Youth Major, Youth
 Participation Team, various youth groups, representatives from social services, the
 Welsh Assembly and the Electoral Commission to engage on opportunities for young
 people to register to vote.
- Job Fayre registration stand to promote registering to vote and the importance of being on the electoral register.
- Family Information Service Picnic and Play registration stand to promote registering to vote and the importance of being on the electoral register.
- Armed Forces Day social media campaign to increase awareness to members of the Armed Forces of their entitlement to register to vote.
- International Youth Day social media campaign to increase awareness of the day and link this to young people registering to vote.
- Fresher's Fayres stand for registration encouragement and opportunity to ask questions.
- Local Democracy Week social media campaign promoting general voter registration to all.
- UK Parliament Week promotion of event linked to Equaliteas workshops.

- Schools invite to all schools for the Electoral Registration Team to present at assemblies, provide workshops and offer registration sessions to encourage younger residents to register to vote.
- Diverse Cymru attendance at meetings to raise awareness of electoral registration and joint partnership working.
- Residential and Care Homes quarterly canvass support offering a one to one service to support residents in residential or care homes on how to register to vote.
- Hostels regular support offering a one to one service to support residents in hostels on how to register to vote.

Learn Welsh in the Vale Programme

Contributes to Equality Objective 4.

The Learn Welsh in the Vale programme is funded by the National Centre for Learning Welsh on behalf of the Welsh Government. It provides Welsh classes for adults at all levels of learning across the Vale.

The courses are available to all adults who are 16 years old and above. There is grant subsidy for the courses. Learners pay £90 for mainstream courses which run for 30 weeks. For learners who are on means tested benefits, there is a concession of 40%.

All learners can apply to the National Centre for Learning Welsh for payments from a Financial Contingency fund. This can pay for additional costs of attending classes such as travel and childcare costs.

We offer taster courses free of charge. We provide taster courses free to parents in some schools in partnership with Get Back on Track and Flying Start.

Some additional discounts apply at particular times of the year, such as the 20% early bird discount. Learners usually pay online through the Learn Welsh website. However,

the Learn Welsh office also accepts cash and cheque payments, and can, at the manager's discretion, make arrangements for learners to pay in instalments where they have financial difficulties.

These arrangements help to make Welsh courses open to a wide variety of people.

Enrolment criteria

Any adult can enrol on a Welsh course whatever their language background. Experienced staff offer a free level check and advice as to which level is appropriate. We welcome Welsh school leavers and other adults who wish to rekindle their use of the language. We support them through courses and social events which include social events, celebrations and family provision.

We encourage advanced learners to participate in social activities in local Welsh language groups such as Merched y Wawr and Cymrodorion y Barri. The National Centre for Learning Welsh supports the Siarad programme. This programme pairs learners with a fluent Welsh speaker to spend time conversing and socialising in Welsh.

Flexibility

We offer a range of courses in the daytime and evening to maximise opportunities. We also offer courses at a range of venues throughout the Vale of Glamorgan to support those in rural areas. Most venues are accessible by public transport.

Creche

We offer free crèches at main centres for parents and carers attending daytime classes. This enables people to access learning and training opportunities with childcare support. We timetable courses to allow for parents to fit around children in school.

Partnership

We are able to promote learning opportunities to communities throughout the Vale by working in partnership with a range of organisations and stakeholders. Partnership events and social media help to ensure that information is accessible to all.

Disability Access

All centres are accessible to disabled service users and have appropriate access to facilities such as lifts, ramps, and toilets. Additional equipment is available to support sensory impaired learners, such as hearing loops, lamps, and adapted keyboards.

Family Learning

An additional grant from the National Centre for Learning Welsh pays for the innovative project, Clwb Ni – a Welsh medium and bilingual homework club for children in Welsh school and their parents. The club is run in the Palmerston area of Barry. It provides free refreshments and snacks to families as well as activities for all ages to support language development.

Welsh Medium

Learn Welsh in the Vale supports the Get Back on Track programme. It provides adult education courses through the medium of Welsh. We provide some regular courses and events for adults and their families to communicate in Welsh and to practice and improve their Welsh language skills.

Additional Learning Needs

When enrolling for courses, learners have the opportunity to state that they have a condition or additional learning needs. This information is available to the management staff of Learn Welsh in the Vale.

We train tutors to adapt their methods to ensure they fully include learners with additional needs in learning activities. Where that need involves the provision of adapted materials, the Learn Welsh office staff support the tutor by, for example, producing large print resources for visually impaired learners.

We have an exams officer who arranges exam considerations according to need for learners sitting WJEC Welsh for Adults exams.

Job Evaluation

Contributes to Equality Objective 8.

We have a job evaluation scheme in place. This scheme is for staff paid under the Single Status collective agreement. It makes sure that there is a systematic way of deciding on the pay and grade for a job. This results in equal pay for work of equal value. The results of job evaluation are linked to our pay and grading system. We put in place a formal pay and grading system in March 2012 following conclusion of an extensive job evaluation process. It has helped us to pay people fairly and in a consistent way.

There are other factors that affect people's pay such as the type of jobs that they choose to do. Men and women often choose to do jobs that men and women have traditionally done. We call this occupational segregation. It often plays a part in there being a gap between the pay of men and women – a gender pay gap.

As part of our Workforce Plan, we continue to look for ways to reduce the gender pay gap. Since 2012, we assess new and changing jobs through our job evaluation system. As part of this, we think about a number of factors including the knowledge, skills and experience people need to do the job. There are many changes like this as we reorganise our departments and think about how we can best do our work. Using this approach keeps pay and grading fair and consistent.

The Workforce Plan (2016 - 2020)

Contributes to Equality Objective 8.

We have a workforce plan for the period 2016 – 2020. This plan makes sure that we have:

- the right people;
- with the right skills;
- in the right place;

at the right time.

This helps us to continue to provide our services at a time when there are great financial challenges and increasing demand for our services. We plan to make sure that the make-up of our workforce is similar to the make-up of the local community in terms of protected groups.

We have put in place a way of recording the protected characteristics of our staff. This means we can compare our statistics with local and national statistics to see what progress we are making. We can then plan how to make improvements.

As part of the workforce plan, we have a strategy to look at increasing the number of employees aged 16 - 24. The focus is on accessing training and creating opportunities through apprenticeship levy payments. This enables us to offer quality training opportunities and quality employment to the 16 - 24 age group.

As part of the strategy we are building relationships and developing offerings with local providers, including Cardiff and Vale College. We are striving to offer the full range of apprenticeships available in Wales. We have put in place a system for new job listings. Hiring managers must check with the Organisational Development and Learning Team whether the role could be suitable for an apprenticeship. The apprenticeship scheme is promoted both inside and outside the organisation.

Specified employment information, including information on training and pay

We have been collecting employment data for many years. We have collected information on the following protected characteristics:

- gender;
- race;

- disability; and
- age.

We have continued to develop new systems. This will let us report on more protected characteristics in the future. We will be able to collect and record information on:

- sexual orientation;
- gender reassignment;
- gender identity;
- national identity;
- religion or belief; and
- marital status.

We wanted to focus on some key actions. To help us, we used guidance from the Welsh Government. The name of the guidance is 'Collecting Equality Data: Harmonised Standards and Best Practice'.

We changed the form we use to collect information about people when they apply for jobs. We now ask about all protected characteristics on the form. You can see the form in Appendix 3.

We developed a staff survey. We used this to ask staff about their protected characteristics. We improved the way we record this information. Doing this helps to improve what we know about protected groups within our workforce.

We have looked at the information that we have collected. You can see what we have found out in <u>Appendix 5</u> of this report. There is a summary of the headlines by protected characteristic below.

Age

- Since 2015 / 2016, there is a noticeable increase in the number of people we employ in the 60+ groups but a decrease in the number of people aged between 16 and 24.
- There was a slight drop in the average salary for employees in the 16 19 and 30
 34 age groups. The average salary for people in other age ranges increased.
- People who were between 35 and 39 years of age had the highest average salary which remains the same.
- Due to the increase in the number of apprentices now working for the authority,
 there has been an increase in the salary band £0 to £14,999.
- The highest proportion of people attending training was the 50 54 age group with 249 or 15.4%. This is a change from the previous year where the highest proportion of people attending training was the 55 59 age at 132 or 16.6%.
- The highest percentage of applications was in the 25 29 age band (17.3%).
- There was an increase in the percentage of applications in the 16 19 and 50 54 age groups.
- Most people who left were between 50 and 54 years of age (13.7% and an increase over last year's 8.3%). Fewer people left in the age groups 16 19, 20 24, 35 39, 45 49 and 65 plus.

Disability

• 83% of our staff did not have a disability. 2.5% said they had a disability that limited them a little; 0.4% said they had a disability that limited them a lot.

- The average salary for those with disabilities that limited them a little or limited them a lot have both decreased since the previous year. Those who have told us they have no disability, who have not recorded it, preferred not to say, or have a disability have all increased their average salary since the previous year.
- The average salary for those who said they had a disability was £27,562 compared to £24,070 for those with no disability, £25,556 for those with a disability that limited them a little, and £24,400 for those with a disability that limited them a lot.
- 3.6% of people who attended training had a disability that limited them to some extent.
- Fewer applicants said that they had no disability (87.2%). This is a decrease on the previous year (90.5%).
- The number of leavers who said they had a disability that limited them to some extent decreased since the previous year.

Gender reassignment

 There was an increase in the number of employees who chose to record their gender at birth compared to the previous year.

Marital status

 Just under half of our employees were married (48.2%) whilst about a third of our employees were single (31.5%).

Maternity, Paternity, and Adoption

- There were 70 employees who had maternity, paternity or adoption pay and leave during 2018/19. This number has decreased by 18 when compared to the previous year.
- There were 46 people who had training in the same year as they had maternity, paternity or adoption leave. This is a large increase over the 20 people from the previous year.

National Identity

- Most employees said they were British or Welsh.
- Most applicants said they were British or Welsh. The number of applicants who said they were British is now the highest identity for applicants at 51%. This has increased from 847 to 1494.

Race and ethnicity

- Most employees were White over 87% which is a slight increase on the previous year.
- For people with White ethnic backgrounds, pay increased for those in seven out
 of the nine groups since the previous year. Only White and Black Caribbean and
 White Other had a decrease.
- There was a decrease in pay for people in the groups mixed other and African.
 There was an increase in pay for all the other ethnic groups and those who chose not to disclose or not to record their ethnicity.
- The difference in mean hourly rate between White British and Ethnic Minorities is £0.56 (£13.20 for White British and £12.64 for Ethnic Minorities) which is a

reduction compared to last year (£12.74 for White British and £12.07 for Ethnic Minorities). The mean ethnicity pay gap as a percentage is 4.24%.

- The difference in median hourly rate between White British and Ethnic Minorities is £0.40. The median ethnicity pay gap as a percentage is 3.62%.
- 73% of employees who attended training were White and British.
- White and British remains the highest category for applicants at 74.9%. Over
 90% of people applying for jobs were White.
- Over 88% of leavers were White. There was an increase in the percentage of White and British leavers which remains the highest ethnic group for leavers at 69.5%.

Religion or belief

- Most staff either had no religion (34.2%), were Christian (33%); or did not record their religion or belief (29.1%).
- Most applicants stated that they had no religion (50.3%).
- There was a decrease in the percentage of applicants that said their religious belief was Christian (36.6% to 32%); and an increase in those who said they were Muslim (23% to 39%), Sikh and held other beliefs.

Sex

 Our workforce was 68.1% (1843) female and 31.9% (864) male. The number of female employees went down from 1859 to 1843 and the number of male employees increased from 845 to 864.

- Over two thirds of the people we employ are female. It is typical to find that more women than men work in local authorities.
- There were slightly fewer women employed (1843) compared to the previous year (1859) and slightly more men (864) compared to the previous year (845).
- Most females continued to work in permanent part time jobs (798 employees in 2018/2019). This has decreased from the 820 in the previous year. The number of males in the part time positions decreased since the previous year.
- The gender balance of Chief Officers changed with one more female and one less male. Women represented 47.9% of Chief Officers.
- 48.2% of women and 42.5% of men held jobs paid between £15,000 £19,999.
 46.4% of all jobs are paid between £15,000 and £19,999.
- Average pay for women rose more than for men. This was the same as the previous year. There was a £796 rise for women compared to £121 rise for men.
- The difference in mean hourly rate between Male and Female is £0.86 (£12.37 for males and £10.65 for females) which is a reduction compared to last year (£12.13 for males and £10.44 for females). The mean gender pay gap as a percentage of men's pay is 6.24%. This is lower than the UK figure below. In the UK the Mean Gender Pay Gap is 13.1% (Personnel Today).
- The difference in median hourly rate between Male and Female is £1.72. The
 Median gender pay gap as a percentage of men's pay is 13.90%. This is higher
 than the UK figure shown below. In the UK, the Median Gender Pay Gap is 9.6%
 (Personnel Today).
- More than 71% of the people who attended training were female. This has
 decreased since the previous year from 80.7%. The percentage of people who
 are male has increased from 19.3% to 28.6%.

- Over two thirds of people applying for jobs were female (66.11% or 1931 females).
- The number of applications from people who did not tell us about their gender has increased.
- More women than men left their jobs. We would expect this as we employ more
 women than men. The percentage of people who left their jobs and were men
 increased on the previous year (37.1% compared to 31%) and the percentage of
 people who left their jobs and were women decreased (62.9% compared to 69%).

Sexual orientation

- 67.2% of our staff said they were heterosexual. There was little change in the numbers who said they were gay or lesbian. More staff have recorded that they are bisexual. There were fewer employees who did not tell us their sexual orientation.
- When looking at the pay of lesbian, gay, or bisexual employees, 47% were employed in the salary band £0 - £19,999.
- We have started to monitor the success of lesbian, gay, and bisexual people from application to successful appointment. For 2018 / 2019, there were 125 applications and 20 successful appointments (16%) compared to 10 out of 82 in the previous year (12%). This covers both internal and external vacancies within the Council.
- The percentage of applicants who said they were bisexual, gay or lesbian slightly increased to 3.8% from 2.7% in the previous year.

Welsh language

- Just under a third of our staff have some level of Welsh language skills: understanding 31.6%; speaking 26.4%; reading 23.3%; and writing 17.9%.
- Of those employees with Welsh language skills, those who are competent or good in Welsh for Understanding and Speaking had the highest average pay.
- Welsh language skills for applicants were: understanding 61.7%; speaking 28.8%; reading 27.4%; and writing 23.3%.

There is also an action plan (Appendix 6). It shows what we have done since the previous year and what we will do to deal with concerns in the future.

We will continue with this work. We want to be able to report on all protected characteristics.

We do not have all the information that we need to collect to meet the general and specific duties. The reasons for this are:

- reporting systems need further updating;
- some staff choose not to disclose personal information;
- extra and up-to-date data on protected characteristics needs to be collected;
- limited guidance meant we had to clarify what we had to report on.

We have improved our data on Welsh language. We surveyed all our staff to get up to date information on Welsh language skills. This was to meet the Welsh Language Standards set out from 1 April 2016.

Even when we make these improvements, we may not get the information we need. We think some people will choose not to tell us about some of their protected characteristics. We encourage people to do so by explaining:

- why we are asking for this information; and
- how we can use it to better meet their needs.

The information for this report comes from systems in Human Resources. This means that the information is as correct and complete as possible. We know that we will need to continue to work on this information for future reports. This will help us meet the requirements of the general duty.

For more information

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