

**TABLE OF REPRESENTATIONS, AND THE COUNCIL'S RESPONSE AND RECOMMENDATIONS FOR ANY CHANGES TO THE CORPORATE EQUALITY SCHEME 2024-2028**

| <b>Rep. No(s).</b> | <b>Representation By</b> | <b>Summary of Representation</b>  | <b>Officer Response</b>  | <b>Recommendation</b>  |
|--------------------|--------------------------|---|--|--|
| 1                  | Member of the public     | A comment was submitted by a member of the public which agreed with the principle of equality of opportunity, looking after the elderly and disabled but was not supportive public funds being used for officer training for issues such as equality, diversity and inclusion or neurodiversity. The respondent felt that it was not necessary to look at all protected characteristics when providing services, with the exception of care for the elderly and disabled. | <p>It is a legal requirement for all public bodies and any private and voluntary bodies to have due regard to the Public Sector Equality Duty which was introduced by the Equality Act 2010.</p> <p>The duty sets out the 9 the following protected characteristics:</p> <ul style="list-style-type: none"> <li>• Age;</li> <li>• race;</li> <li>• disability;</li> <li>• sexual orientation;</li> <li>• religion or belief;</li> <li>• sex;</li> <li>• gender reassignment;</li> <li>• marriage &amp; civil partnership; and</li> <li>• pregnancy &amp; maternity.</li> </ul> <p>If the Swale Corporate Equality Scheme does not have due regard to all 9 protected characteristics, the Equality and Human Rights Commission have powers to serve public authorities with compliance notices in the event of breaches of the general duty.</p> | <b>No change to document recommended.</b>  |
| 2                  | Member of the public     | A respondent commented that the best person for the job should be hired. Their sex, colour, age, sexual orientation, religion etc should be irrelevant.   | The council ensures the best person for the job is hired regardless of factors such as sex, colour, age, sexual orientation, religion, and other irrelevant characteristics. The   | <b>Suggest the following text to be added to the background section to Equality Objective 4:</b> |

**CORPORATE EQUALITY SCHEME – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

| Rep. No(s). | Representation By | Summary of Representation | Officer Response  | Recommendation   |
|-------------|-------------------|---------------------------|---|--|
|             |                   |                           | <p>council ensures a fair and open recruitment practices are followed – the steps to achieve this is listed below:</p> <ul style="list-style-type: none"> <li>• clear job descriptions and person specifications are developed outlining the necessary qualifications, skills, and experience required for the position. The criteria in the job descriptions and person specification is used as the basis for evaluating candidates.</li> <li>• structured interviews are carried out with predetermined questions relevant to the job requirements. This ensures that all candidates are assessed fairly using the same criteria to assess individuals.</li> <li>• Interview panels are organised with at least one panel member trained in recruitment &amp; selection skills. This helps to ensure a more comprehensive evaluation of candidates.</li> <li>• Awareness of unconscious bias is included as part of the</li> </ul> | <p><b><i>“When hiring new staff, we make sure that the best applicant for the job is hired and make sure that fair and open recruitment practices are followed.”</i></b></p> |

**CORPORATE EQUALITY SCHEME – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

| Rep. No(s). | Representation By    | Summary of Representation  | Officer Response  | Recommendation                            |
|-------------|----------------------|--|---|---|
|             |                      |  | <p>recruitment &amp; selection training to managers and interviewers. This helps them to recognise and mitigate biases that may impact their decision-making during the recruitment process.</p> <ul style="list-style-type: none"> <li>Recruitment data is monitored annually to ensure recruitment practices are carried out fairly and to make sure the recruitment process is effective in employing the candidates with the right level of skills and experience for the roles.</li> </ul> |   |
| 3           | Member of the public | A comment was submitted which referred to a priority in the Corporate Plan "Economy – working with our businesses and community organisations to work towards a sustainable economy which delivers for local people.". The respondent felt it was pointless asking for support about something the council should be doing anyway. The respondent also commented on planning permission being given for supermarkets on the Isle of Sheppey when the infrastructure was not in place for people who did not drive. | The priority referred to in this comment is from the recently adopted Corporate Plan. However, when officers are writing a new policy or strategy, reviewing an existing policy or strategy or making any decision that may affect residents such as removing a service or introducing a new one, they must take the time to consider how individuals with any of the 9 protected characteristics might be affected and to take active steps to lessen any potential adverse impact.            | <b>No change to document recommended.</b> |
| 4           | Member of the public | A respondent commented that the objectives were vague and could mean anything or go anywhere.  | Comment noted with thanks.  | <b>No change to document recommended.</b> |

**CORPORATE EQUALITY SCHEME – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

| Rep. No(s). | Representation By        | Summary of Representation  | Officer Response   | Recommendation  |
|-------------|--------------------------|--|--|---|
| 5           | Swale Borough Councillor | <p>I'm aware that the EQIA forms used by officers at Swale already include a request to go 'beyond' the nine characteristics which have legal protection and ask officers to give consideration to additional disadvantaged groups, including those on low incomes, or affected by rural deprivation or poor health.</p> <p>Would it be possible for us to add a couple of sentences at the relevant point on page 11 of our policy to make specific reference to the fact that we consider the impact on these groups when completing EQIAs in addition to the legally protected characteristics?</p> | Comment noted and suggest expanding the section in Equality Impact Assessments on page 11.   | <p><b>The following text to be added to this section:</b><br/> <i><b>“The Equality Act requires due regard should be given to individuals with any of the 9 protected characteristics. The Swale Borough Council EIA goes further by requiring officers to consider other socially excluded groups including those with literacy issues, people living in poverty, on low incomes, people who are geographically isolated from services, affected by rural deprivation or poor health.”</b></i></p> |
| 6           | Swale Borough Councillor | In the equality consultation document it states that there isn't info on gender reassignment or on sexual orientation but the census on 2021 collected both of these stats for the first time so it would be good to capture that.   | Comment noted and agreed.  | <p><b>Data on sexual orientation and gender identity will be added to Appendix I</b></p>  |
| 7           | Swale Borough Councillor | When the draft was considered at the Policy & Resources Committee meeting on 7 February, a Committee Member noted that equality and diversity key characteristics for staff were included as evidence at the back of the   | The Chief Executive asked for an equality & diversity questionnaire to be sent to all Members, responses were anonymous and responding was optional. | <p><b>The feedback from the questionnaire will be included in the final document under Appendix II.</b></p>   |

**CORPORATE EQUALITY SCHEME – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

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|--------------------|--|---|---|--|
|                    |  | scheme, but there was no such data for councillors.   |   |  |
| 8                  | Officer comment made at Swale Managers Forum | Objective 1, bullet 2 “consulting, involving and engaging representative networks covering all equality areas to help inform our future activities” it was noted we do not have a representative that we rely on, suggested remove ‘all’ from Equality areas. | Comment noted and change to text suggested. | <b>Suggest changing text to read “<i>consulting, involving and engaging representative networks covering equality areas to help inform our future activities</i>”</b>  |
| 9                  | Officer comment made at Swale Managers Forum | Objective 1, bullet 4 - Acknowledge difficulty engaging with the schools as curriculum time so busy. Ability to send people / staff is limited.   | Comment noted and change to text suggested. | <b>Suggest changing the text to read “<i>to engage with schools to inform young people about democracy and the work of the council, dependent on our resources and the time available within the schools’ curriculum</i>”;</b> |
| 10                 | Officer comment made at Swale Managers Forum | Objective 1, bullet 4 - Funding cuts from KCC Youth Provision so cannot use as vehicle that could in the past, which was successful engagement tool.  | Comment noted and change to text suggested. | <b>Suggest changing the text to read “<i>to engage with schools to inform young people about democracy and the work of the council, dependent on our resources and the time available within the schools’ curriculum</i>”;</b> |

**CORPORATE EQUALITY SCHEME – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

| Rep. No(s). | Representation By                            | Summary of Representation   | Officer Response                            | Recommendation  |
|-------------|--|---|---|---|
| 11          | Officer comment made at Swale Managers Forum | Objective 1, bullet 4 - Can be difficult as tools available before / existing mechanism not available now.  | Comment noted and change to text suggested. | <b>Suggest changing the text to read “to engage with schools to inform young people about democracy and the work of the council, dependent on our resources and the time available within the schools’ curriculum”;</b>                                 |
| 12          | Officer comment made at Swale Managers Forum | Objective 1, bullet 5 - Do not have a team for supporting voluntary sector  | Comment noted and change to text suggested. | <b>Suggest changing the text to read “continuing to encourage the number of people giving their time to help others in Swale by supporting the voluntary and community sector when possible”</b>  |
| 13          | Officer comment made at Swale Managers Forum | Objective 2, It might be useful to consider, expanding the definition of vulnerability to include economic factors and mental health issues could provide a more holistic support system. | Comment noted and change to text suggested. | <b>Suggest changing the text in opening sentence to “This objective is about supporting Swale’s more vulnerable residents, including those with either a physical or mental health disability, as well as those who are economically disadvantaged.</b> |

**CORPORATE EQUALITY SCHEME – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

| Rep. No(s). | Representation By                            | Summary of Representation   | Officer Response                                 | Recommendation   |
|-------------|--|---|--|--|
| 14          | Officer comment made at Swale Managers Forum | <p>Objective 2, bullet 1 – “continuing to support Swale’s elderly and vulnerable residents through programmes such as the Staying Put service”</p> <p>Suggest remove the word “elderly”</p>   | Comment noted and alternative text is suggested. | <b>Suggest changing the text to read “<i>continuing to support our vulnerable and disabled residents, regardless of age, through the Home Improvement Agency and Disabled Facilities Grants.</i>”</b>              |
| 15          | Officer comment made at Swale Managers Forum | <p>Objective 2, bullet 2 – “supporting partners to improve health and reduce hospital admissions through effective home adaptations and by improving conditions in privately rented homes”</p> <p>Suggest ‘work in partnership’ rather than “supporting partners”</p> | Comment noted and change to text suggested.      | <b>Suggest changing the text to read “<i>working in partnership to improve health and reduce hospital admissions through effective home adaptations and by improving conditions in privately rented homes</i>”</b> |
| 16          | Officer comment made at Swale Managers Forum | <p>Objective 2, bullet 3 – “supporting households with the greatest housing needs to access affordable housing”</p> <p>Technical and wording issue. Housing policy covers, equally, low lets are available and manage expectations of criteria and eligibility</p>    | Comment noted and change to text suggested.      | <b>Suggest changing the text to read “<i>supporting eligible households with the greatest housing needs to access affordable housing</i>”</b>  |
| 17          | Officer comment made at Swale Managers Forum | Objective 3 - It might be beneficial to include specific initiatives aimed at reducing the digital divide, such as digital literacy programs and providing access to technology for disadvantaged groups.   | Comments noted and change to text suggested.     | <p><b>Suggest making the following text changes:</b></p> <p><b>Bullet 4 should have the words “<i>where resources allow</i>” added at the end.</b></p>   |

**CORPORATE EQUALITY SCHEME – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

| Rep. No(s). | Representation By                            | Summary of Representation   | Officer Response                            | Recommendation  |
|-------------|--|---|---|---|
|             |  | Additionally, regularly reviewing the accessibility and usability of the council's website and digital services through feedback from users with diverse needs can lead to more inclusive service delivery.   |   | <b>Bullet 7 should read “<i>providing council information in accessible formats, ie accessible website content, ...</i>”</b>  |
| 18          | Officer comment made at Swale Managers Forum | <p>Objective 3 – bullet 1 “providing a choice of access to our services through a balance of cost-effective and convenient options, and pursue initiatives to improve customer service at reduced cost (eg. face-to-face, electronic, phone or written letter depending on customer need);</p> <p>Cost effective does not mean inconvenient, they are not mutually exclusive.</p> <p>Face to face last in list rather than first as most expensive.</p> | Comment noted and change to text suggested. | <b>Suggest changing the text in Objective 3, bullet 1 to: “<i>providing a choice of access to our services and pursue initiatives to improve customer service at reduced cost (eg. electronic, phone or written letter depending on customer need), or face-to-face;</i>”</b> |
| 19          | Officer comment made at Swale Managers Forum | <p>Objective 3 – bullet 2 “delivering high levels of customer satisfaction with our services”</p> <p>Expectation and what customers are entitled to cannot always match, and unrealistic to achieve. Addressing requirements.</p>   | Comment noted and change to text suggested. | <b>Suggest changing text in Objective 3, bullet 2 to read: “<i>making sure our services meet the needs and requirements of our customers.</i>”</b>  |
| 20          | Officer comment made at Swale Managers Forum | <p>Objective 3, bullet 11 – “endeavour to have greater consideration of cultural diversity when commissioning new services”</p> <p>Not just “cultural diversity” should be all protected characteristics.</p>   | Comment noted and change to text suggested. | <b>Suggest text to be amended to: “<i>having a greater consideration of people with any protected characteristic when</i>”</b>  |



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|--------------------|--|---|---|--|
|                    |  |   |   | <i>commissioning new services”.</i>  |
| 21                 | Officer comment made at Swale Managers Forum | Objective 4 - Encouraging more diverse recruitment not only across different roles but also at senior levels can further demonstrate the council's commitment to diversity and inclusion. | Comment noted and change to text suggested. | <b>Suggest the following text to be added to the background section to Equality Objective 4: “When hiring new staff, we make sure that the best applicant for the job is hired and make sure that fair and open recruitment practices are followed.”</b> |
| 22                 | Officer comment made at Swale Managers Forum | Objective 4, bullet 4 “adopting non-discriminatory practices”<br><br>It is against the law not to comply and is a legal requirement. Suggest changing to: “Ensure continuing compliance”. | Comment noted and change to text suggested. | <b>Suggest text to be amended to “ensuring continuing compliance to non-discriminatory practices”.</b>   |