

South East England Development Agency

Race Equality Scheme 2009-2012

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About SEEDA

SEEDA is the Government funded agency set up in 1999 responsible for the economic and social development of the South East of England - the driving force of the UK's economy.

The South East is the 22nd largest economy in the world, bigger than several countries including Denmark, Austria, Sweden, South Africa, Singapore and Greece. As home to over eight million people, it is the largest region in the UK - bigger than Scotland, Wales and Northern Ireland combined, and covers the counties of Berkshire, Buckinghamshire, Hampshire and the Isle of Wight, Kent, Oxfordshire, Surrey and East and West Sussex.

SEEDA's aim is to create a prosperous, dynamic and inspirational region by helping businesses compete more effectively, training a highly skilled workforce, supporting and enabling our communities, while safeguarding our natural resources and cherishing our rich cultural heritage.

Accountable to Government, SEEDA is a business led organisation, governed by a Board whose Members have wide-ranging experience in industry and commerce, local government, education, trade unionism and voluntary service. We are also subject to National Audit Office inspections.

1. Introduction to Equality & Diversity

Equality and Diversity is not an issue that anyone can ignore. The UK is in a time of huge demographic social and economic change which requires proactive action to enable our economy to continue to grow.

The UK has a shrinking tax base. By 2014 there will be more people over 65 than under 16 meaning that our ability as a nation to pay for the infrastructure and public services we require throughout our lives will diminish over time.

Addressing this challenge and creating long-term sustainability will require a fresh approach to employment. Not only do we have to get used to the idea of working later into our lives, but employers must recognize and enable the economic potential of the entire population; removing the physical and social barriers to participation in employment for all.

Indeed, embracing diversity has its own benefits to the economy. Diverse workforces have been proven to be more innovative and therefore more competitive. The mix of perspectives brought about in a diverse business often enables the identification of new markets and opportunities that are not open to businesses with homogenous workforces.

In addition, the increasing impact of globalization on how and when we work means that the time-bound norms of the nine to five approach to business is becoming less relevant. Businesses now often carry the burden of a 24 hour approach to work. To make this sustainable in the long-term they must adapt their use of communication and travel to be led by customer demands and employee needs through embracing a more flexible approach to work.

This new flexibility brought about by advances in communication and information technology brings about a whole new world of possibility for better integrating personal needs, family life and work. Making the workplace a more equitable and flexible place also increases productivity and helps to retain staff. Employees are more likely to work effectively in an environment where they feel valued, their needs are met and they can take control over their working conditions.

As an Economic Development Agency, Equality and Diversity is therefore our core business. We want to ensure that our own staff are able to reach their potential because our effectiveness as an organization depends on it. Equally, we want to support all businesses and employers across the South East to embrace these principles so that our region will become more competitive, our communities stronger and our long term development more sustainable.

The RES and Equality and Diversity

For the first time, the new Regional Economic Strategy (RES), published in 2006, raises the prominence of the importance of Equality and Diversity to the region by including it as a theme that cuts across the entire body of our work as a Regional Development Agency. At the implementation level the approach to embedding equality and diversity across the RES take on four forms:

Implementing Compliance Measures

Ensuring the region has an appropriate understanding of the baseline of equalities issues, developing targets for action and monitoring progress. This approach also focuses on increasing the level of representation and transparency on equalities issues across decision making in the region and looks to the public sector to lead the private and third sectors by example.

Community Strategies

Recognising that communities are the building blocks of successful economies and the place where discrimination, in all its forms, is best addressed. This approach will look at the leverage that communities can bring to reduce discrimination, from actions as diverse as; early years education to enabling community participation and structuring the built environment to support community cohesion.

Work-Infrastructure Strategies

The work infrastructure approach to addressing equalities focuses on addressing the barriers of 'how' work is structured. For example, supporting people to work more flexibly may help more people with caring responsibilities to enter work. This approach will focus strongly on influencing employers and supporting transitions into work.

Business Case Strategies

The South East also has one of the greatest opportunities for developing a business case for promoting equality and diversity. This approach will work with investors and employers to see the competitive advantage that the region can harness if all members of society are given an equal opportunity to participate economically. The focus of the region's economy on strong international links in particular provides an opportunity to link into global communities and harness diverse skills and cultures that will promote our global competitiveness.

What will success look like in the lifetime of the RES?

We hope that in the lifetime of the RES these approaches will enable us to deliver a greater shared understanding of the economic and social opportunities arising through harnessing diversity and promoting Equality. We also wish to see a reduction in discrimination in all spheres of life and increased civic participation from all our communities of geography and interest.

2. The Race Equality Duty

The Race Relations Amendment Act (2000) places a general duty on public organisations to promote race equality. This duty means that organisations must have due regard to the need to:

- a. eliminate unlawful racial discrimination
- b. promote equality of opportunity
- c. promote good relations between people of different racial groups.

The provisions of the statutory code of practice to promote race equality outlines that the above objectives will be met through the following activities:

- Writing and publishing a race equality scheme
- Monitoring employment procedures and practice.
- Identifying which of their functions and policies are relevant to the duty, or in other words, affect most people.
- Put the functions and policies in order of priority, based on how relevant they are to race equality.
- Assess whether the way these relevant functions and policies are being carried out meets the three parts of the duty.
- Consider whether any changes need to be made to meet the duty.

3. SEEDA - A strategic response to equality & diversity

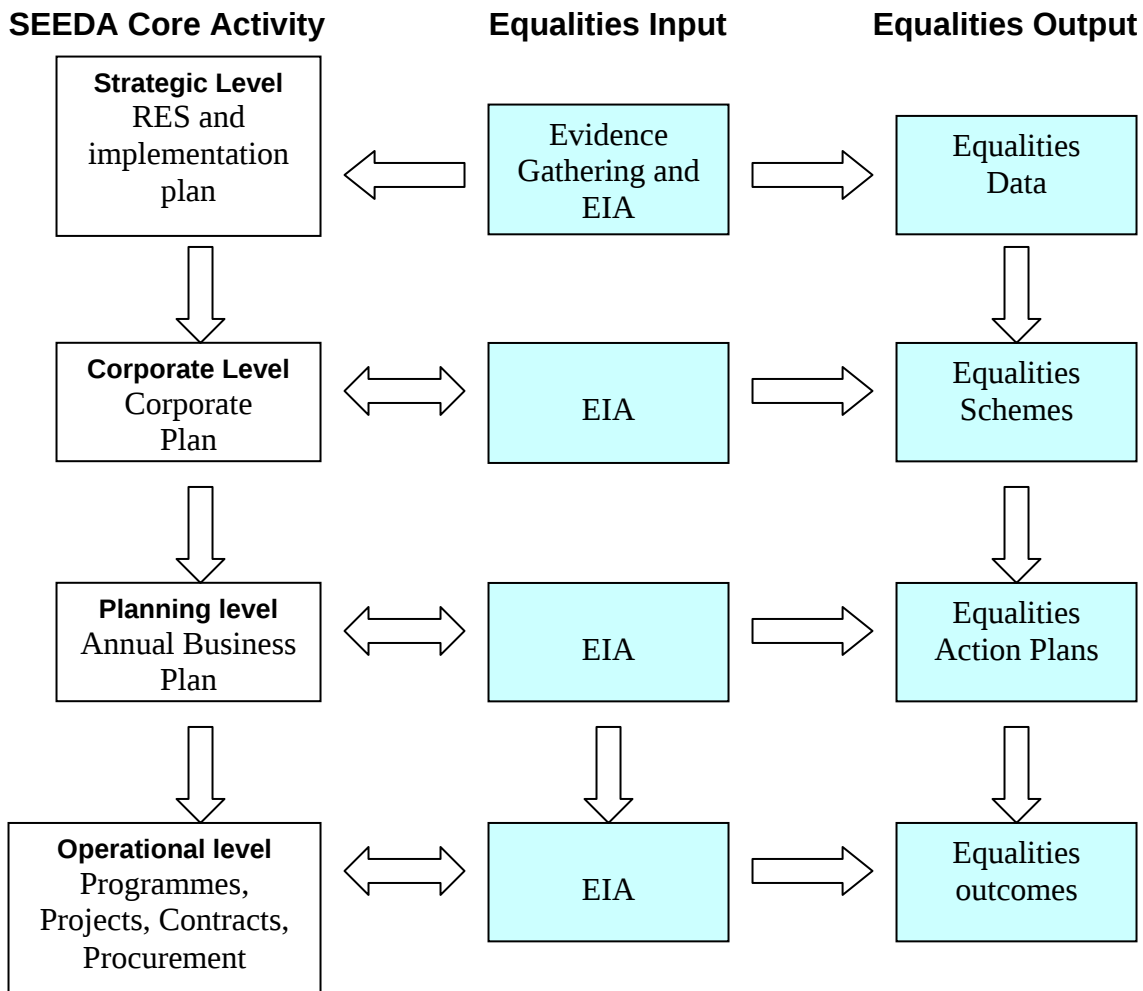
SEEDA is a strategic organisation, whose role is largely to influence others, working in partnership to develop and deliver policy across the region. In order to support the integration of equality and diversity considerations into this strategic role we have developed an integrated framework for equality and diversity, which seeks to mainstream equality compliance and best practice throughout all our functions.

The structure of the strategic process has a starting point in the Regional Economic Strategy. For the first time, the current RES has developed a cross cutting theme for equality and diversity. This thematic approach gives each target of the RES a high level equality objective to achieve, with the responsibility for delivery resting on the target lead within SEEDA. The RES itself has been through an equality impact assessment process that highlighted issues that should be considered in the further development of more detailed activities through the RES implementation plan.

The RES implementation plan is the next level down for providing detail on the nature of activities that will be delivered through the RES and has been developed in partnership with key stakeholders in the region. The implementation plan is a region wide action plan (i.e. not just the responsibility of SEEDA to deliver). The implementation plan has now also been through a process of partial impact assessment (PIA) which outlines in detail for target leads how they should approach the achievement of these target objectives. The recommendations of the RES PIA inform the development of strategic level actions for all stakeholders to the RES and are intended to cascade down strategic equality actions to the next operational level for SEEDA, the Corporate Plan.

The intention of this framework is that the RES and corporate plan EIAs establish the policy position and strategic actions and decisions in relation to equality and diversity. This process essentially reviews the two strategic documents which determine how and where SEEDA works in the region.

Figure 1: Embedding Equality and Diversity in SEEDA's work



Through this process we can ensure compliance with those areas of equalities legislation that we, as a public organisation, are required to adhere to. The 8 aspects of compliance are:

1. Data gathering
2. Target setting

3. Recruitment
4. Training
5. Communications
6. Procurement
7. Monitoring and review
8. Consultation

4. Race Equality Priorities

The RES implementation plan partial impact assessment, completed in January 2008 assisted SEEDA to identify priority areas of policy and operations in relation to race equality. These have been defined as:

High Priority – Those areas where there is, or is potential for, a high level of negative impact on ethnic minority communities.

- Employability & Skills
- Enterprise and Business Support
- Physical Development
- Sustainable Communities
- Internal Human Resources
- Internal Procurement

Medium Priority – Those areas where there is a limited specific potential negative impact on ethnic minority communities

- Global competitiveness

Low Priority – Those areas where there is a very low specific potential negative impact on ethnic minority communities.

- Sustainable Consumption
- Climate change and energy

We have focused on these high priority areas as the main basis for the development of actions under the Race Equality Scheme, given the potential impact of these policy and operational areas on ethnic minority communities.

Consultation

In order to judge how effective we are being at mitigating negative impacts and promoting race equality in these policy and functional areas, consultation has been integrated into the project and policy development cycle in the following way.

- All projects that require investment within SEEDA are required to fulfill an EIA screening process, which assists project managers to identify the relevance of the equality duties to the specific project. If a project is identified as being central to equality and diversity promotion it is required to undergo Equality Impact Assessment. (This process is outlined at appendix 4). Consultation is a core requirement of this process.

- All internal HR policy is required to go through equality impact assessment and then to be opened up to staff consultation through SEEDA's joint staff council.
- Externally focused policy is required to complete a minimum of 12 weeks consultation with stakeholders before its approval. Equality stakeholders are targeted through the Culture, Communities and Consumers Team. This process will shortly be strengthened through the recruitment of an independent advisory panel to support SEEDA's policy development process in relation to equality and diversity.
- All projects receiving SEEDA investment are also required to undergo a process of internal or external evaluation. As of 2007, the evaluation policy includes a core requirement to evaluate direct and indirect impacts on equality groups.

Arrangements for monitoring policies for adverse impact.

The arrangements for monitoring policies and projects for adverse impact are outlined in the Equality Impact Assessment process (Appendix 4)

Arrangements for publishing assessments, consultation and monitoring reports.

Summaries of individual consultation processes are published alongside relevant policy documents, with full information available on request. Lists of EIAs undertaken by the agency are also published in our annual report and are available in full from the Culture, Communities & Consumers team on request.

From 2009 the Culture, Communities and Consumers team will report quarterly to the board on the progress of the equality and diversity programme through the agency board report.

Arrangements for making sure the public have access to information and services

All three of our equality schemes are published on the SEEDA website at: http://www.seeda.co.uk/Sustainable_Prosperty/Social_Inclusion/Equality_&_Diversity/ All information can be made available in a range of formats and languages including Braille. We also operate an access policy in our wider communication and engagement with stakeholders, including making provision for interpreters, sign language and physical access at all our corporate events.

Arrangements for training staff

Over the last two years SEEDA has integrated equality and diversity training into its core training modules. This includes compulsory EIA training and online equality training during the induction process. In 2009 the agency will be rolling out a wider programme of equality strand training which is targeted at specific functional areas in the agency.

5. The Race Equality Scheme 2008-11

VISION & OBJECTIVES

Our vision for Race equality in the South East is for all residents of the region to be able to maximize their economic potential regardless of their ethnicity.

In line with SEEDA's primary role to support the economy of the South East, the success of this scheme will be measured against the following headline target:

- **For all ethnic groups in the region to reach the average 2008 economic participation rate of 79.1% or above by 2020.**

The overarching approach of our scheme is to tackle race equality through three main strategies:

- Getting more people from ethnic minority communities into full time work.
- Increasing the real income levels of low income families.
- Reducing direct and indirect discrimination in employment through awareness raising, support for employers and promoting the regional business case for diversity.

These three strategies will be measured under the following objectives:

1. Increase the average economic participation rates of ethnic minority communities from 68% to 79.1 by 2020.
2. Decrease the number of households not earning a living wage from 630,000 in 2008 to 400,000 by 2020
3. Roll out race equality support and awareness raising events to 500 employers by 2011.
4. Use SEEDAs regional knowledge base and influence to encourage other organisations to address race equality issues in social policy areas connected to successful economic growth (ie. Health, Access to services etc)
5. Ensure all SEEDA funded projects and programmes support race equality, through the strategic use of Equality Impact Assessment and the enforcement of the requirements of the Race Equality Duty through procurement.

This strategy recognises that people from all ethnic backgrounds can experience discrimination. However, race inequality is magnified when accompanied by additional factors, in particular:

- People with additional care roles.
- People with disabilities
- The over 50s
- People living in the most deprived parts of the region (coastal and rural communities and those living in housing in the private rental and social housing sectors)
- People on low incomes.

Therefore our approach to action will be to prioritise support for these groups in the delivery of projects and programmes. In addition, the scheme recognises race inequality in the labour market is an expression of race inequality in other parts of society. Therefore, as part of our strategic influencing role we will identify key relationships with other agencies supporting them to address race inequality

6. Methodology

Our Race Equality Scheme is structured around the following framework:

1. A review of the statistical evidence of the impact of Race Equality:
 - In the South East Region
 - Within SEEDA itself.
2. A consultation exercise with regional employers, Staff, and public and third sector groups on their experiences of Race Equality in the South East region.
3. A review of our current activities to promote race equality, internally and externally to assess where we could make improvements.
4. An assessment of our key policy and procedural frameworks to assess how far they promote the mainstreaming of Race equality.
5. The development of a prioritised action plan with headline targets.
6. A monitoring framework to enable us to track our progress over the life time of the scheme, supporting us to make improvements wherever possible.

7. The Regional Evidence Base

Population estimates from the Office for National Statistics in 2006 state that the South East population is 8,237,800 of which 995,700 are ethnic minorities. This constitutes 12.7% of the SE population and is a 40.7% increase in the ethnic minority population from 2001.

Total SE Population (2006)	8,237,800	% change from 2001 2.7% increase
White British	7,242,200	1% decrease
White Irish	83,000	0.5% increase
White Other	300,300	33.7% increase
Mixed white and black Caribbean	31,900	32.9% increase
Mixed white and black African	15,200	56.7% increase
Mixed white and Asian	40,500	33.7% increase
Mixed other	31,300	36.7% increase
Asian Bangladeshi	23,800	51.6% increase
Asian Indian	131,000	44.1% increase
Asian Pakistani	75,200	26.4% increase
Asian Other	38,400	59.3% increase
Black African	65,000	150% increase
Black Caribbean	44,000	56% increase
Black Other	9,000	76.5% increase
Chinese	54,900	61.5% increase
Chinese Other	52,200	74% increase

This data shows an increase in the South East population of every ethnic minority group (some as high as a 150% increase) while the White British population of the South East has fallen by 1%.

Geographical Diversity

The 2001 Census shows us the top ten areas in the South East for density of ethnic minority populations.

The table below shows the percentage of the total population that are not White British:

Area	% of total population (Census 2001)
Slough	41.7
Oxford	23.2
Reading	19.4
Wycombe	16.4
Woking	15.9
Elmbridge	15.8
Crawley	15.5
Windsor & Maidenhead	15.3
Epsom & Ewell	14.4
South Bucks	13.5

The positive and negative experiences of ethnic minority populations in the region are not homogenous. Individuals and communities show varying degrees of success in economic and social participation for a whole host of personal and collective reasons. However, we do know that:

- 79.1% of the South East white British population are participating economically, compared to 68.9% of ethnic minority populations.
- The proportion of Job Seekers Allowance claimants from ethnic minorities in the region is higher than the regional population average at 7.6%.
- In education, 57.6% of all pupils get 5 grade A* to C GCSEs, compared to 83.2% of Chinese students and only 45% of Black students.
- People from ethnic minority groups are more likely to live in the social rented sector than their white counterparts. Highest rates of social renting and lowest rates of home ownership occur in the Black Caribbean and Bangladeshi groups, highest rates of home ownership are reported in the Indian Group.
- One of the main indicators of housing disadvantage is experience of overcrowding. Data indicates that ethnic minority groups are more likely than white groups to live in overcrowded conditions. Of all ethnic minority groups, Pakistani and Bangladeshi groups experience the most disadvantaged housing conditions.
- People from ethnic minority communities are more likely to be a victim of crime.
- In 2003 over one third of Pakistani and African and African-Caribbean pupils and over half the children from the Bangladeshi, Travellers of Irish heritage and Gypsy / Roma groups, received free school meals.

(CEHR Statistics 2008)

In addition to the current census definitions of ethnic minority populations we recognise that Gypsy and Traveller communities are covered by the requirements of the race equality

scheme. The 2001 census did not provide an overview of gypsy and traveller population distribution in the region. However, we have access to data collected by SEERA which will help to inform our considerations of any specific issues for the Gypsy and Traveller populations in the region.

Internally, the recent Cultural Survey carried out across SEEDA shows that 75.8% of staff agree that the agency is committed to equality and diversity practices. Only 6% disagree. This is top line data and we will have more detailed findings when the data has undergone further analysis.

8. RACE EQUALITY SCHEME 2005-2008 REVIEW

In 2005 we published our second Race Equality Scheme. Since its publication we have also been required to complete Gender and Disability Equality Schemes and to begin to prepare for the incoming Single Equality Act. This means that our approach to achieving the objectives of the Race Equality Duty have been integrated into a more joined up and holistic approach to mainstreaming equality issues across the board.

Our progress is outlined below:

Equality Impact Assessment

Equality Impact Assessment training has now been rolled out to all staff in the agency. All projects and programmes now undergo equality impact assessment screening at the pre-investment stage, with partial and full EIA processes followed as appropriate.

Regional Economic Strategy

We created a cross cutting theme for Equality and Diversity within our Regional Economic Strategy. This cross cutting theme ensures that every target in the RES has a relevant, parallel, equality target associated with it. Target leads are supported in the delivery of their responsibilities through the detailed guidance given in the RES implementation plan EIA, published in May 2008. From 2009 further support will be provided through a Equality Advisors Panel.

We have allocated resources within our RES implementation plan to support equality projects and programmes. As equality is now integrated across the RES, target leads are required to assess the equality resources needed to deliver their equality cross cutting theme objective as a part of wider project funding applications.

Human Resources

During April 2007 we ran a comprehensive survey to create a baseline of data about the Equality & Diversity of our staff, this information was published in response to a freedom of information request in October 2007. This survey was repeated in June 2008 to enable us to monitor changes. The information has been loaded on to the new HR system, and will be regularly updated as staff join and leave SEEDA.

All vacancies within SEEDA are advertised both internally on the intranet and externally on the Internet. We also work with a variety of recruitment agencies committed to Equality &

Diversity, for example, Venn Group who are currently working in conjunction with c2e to gain Committed to Equality certification.

As part of an ongoing review of the recruitment process we are looking to monitor applicants at various stages of the recruitment cycle, all applicants are currently required to complete an Equality and Diversity monitoring form. This form requests information on ethnicity, disability, gender, religion and belief, sexual orientation and age.

The selection process is fair, open and objective. More than one person will always interview applicants and all interviews have undertaken online equality and diversity training. Reasons for selection or rejection of applicants will be recorded and fed back on request.

We continually review and update our HR policies and procedures in line with current legislation; since January 2008 all new /revised policies undergo equality impact assessment.

One of our objectives outlined in the 2005 scheme was the development of an internal BME support group for staff from ethnic minority communities. We undertook a process of consultation and engagement with staff regarding the establishment of a number of staff groups of this nature across the equality strands. Unfortunately staff did not express a desire to participate in such a group at that time. We intend to review this position on an annual basis with the option to establish such a group remaining as an open invitation.

Procurement

Following the example of the East Midlands we have started to develop a BME supplier diversity programme in the South East. The programme followed regional research into the impact of BME businesses on the South East Economy. The programme aims to enable more BME businesses to integrate into major supply chains.

Business Support

Ensuring business support meets the needs of equality strand groups has been one of our priorities over the last three years.

Our Business Link Enterprise Gateway service has been one of the most successful business support networks in the UK. Following a review of the focus and purpose of the network we have now shifted the emphasis of the work of Enterprise Gateways to supporting key target groups. Our transformational business support programme aims to develop the right cultural context to support ethnic minority communities, disabled people, young people, the over 50s and people living in deprived communities to start and grow businesses. The programme not only delivers business support to these groups but also develops the skills and understanding of business support professionals to be able to meet their needs more effectively.

In order to measure how successful we are being in delivering business support to ethnic minority communities we have been recording data on the rates of support and satisfaction that we provide to BME businesses through Business Link for three years and are now in a position to track the level of engagement. We know that this development work is now starting to lead to increased engagement of BME owned businesses with Business Link. For example in Q4 of 05/06 the percentage of Business Link customers that were from ethnic minorities was 4%, by Q4 07/08 this had risen to 7%.

We have completed a thorough EIA of Business Link in the South East and are taking forward a series of actions this year, particularly aimed at increasing the take up of Business Link by priority groups. In addition, during 2008 SEEDA and Business Link led the development of a regional strategy for Inclusive Enterprise. This aims to realise the enterprise potential across all groups, focusing particularly on BME, disabled and older workers. The first draft is currently being revised to take account of the government's enterprise strategy and is expected to be completed some time in 2009.

SEEDA is also an observer on the newly established Ethnic Minority Business taskforce, which is co-chaired and managed by Yorkshire Forward. The task force aims to remove barriers to more individuals from BME communities starting and growing businesses. Its priorities are around business support, procurement and access to finance. SEEDA is an active member of the procurement sub group and provides linkages across to the National Women's Enterprise Taskforce.

Promoting Race Equality in the workplace

In 2005 we promised to support the promotion of Race Equality in the workplace. We have translated this into both our internal and external functions. In 2005 we kicked off this process internally through a week long diversity awareness week. We followed this up with an all staff away day in February 2006, which looked at issues of diversity in the workplace.

In 2007 we also rolled out an agency wide online training programme in diversity awareness. This online course is now part of the agency induction programme for all new staff joining SEEDA.

We also recognise that our unique relationships with businesses in the South East place us in a position to promote diversity in the workplace across the region. In early 2007 we developed a regional Corporate Social Responsibility programme operated through Business Link. This programme provides support to employers relating to equality and diversity through information brokerage. In addition, in June we launched the Corporate Cabinet – an innovative partnership between Corporates, SEEDA and the Third sector. One of the six priority themes for the Corporate Cabinet is to develop Cultural Awareness and Opportunity (www.corporatecabinet.com).

Target Setting

We have not set formal targets for addressing race inequality across many of our functions to date because of a lack of comprehensive information at the regional level. The RDA network is also currently reviewing its tasking framework which sets targets and indicators for progress in economic development. We are advocating for the inclusion of a broad range of equality targets in this framework.

At the regional level, we launched a large scale research project to gather as much comprehensive data on all 6 equality strands across the region. This data is available to all regional partners via the regional observatory. This data is intended to be used in strategic EIAs to ensure that individual projects and programmes can use reliable data to set targets for project outcomes. The general principle for policy is that the targets for regional and sub regional working should reflect a desire to reach parity for all equality groups with regional averages as an absolute minimum.

Monitoring

Our 2005 Race Equality Scheme made a commitment to work to the framework of the Local Government Equality Standard. Whilst we have used many of the processes outlined in the

Local Government Standard as a guide, we have taken a decision not pursue the formal accreditation process. We have taken this decision because on reflection, some aspects of the local government standard are less relevant to a Regional Development Agency and its functions. Instead we are working across the RDA network to establish peer assessment mechanisms to assist us to measure and report on our progress. This work is still in development because of the complex strategic function of RDAs. We hope to have greater clarity about how we will report into government as a RDA network in 2009 when the implications for the role and functions of the RDAs emanating from the Sub National Review for Economic Development are clearer.

Physical Development

In 2007 SEEDA responded to the results of the CRE investigation into regeneration. This process helped us to bring in new life to our work with ethnic minority communities in physical development programmes. We launched an EIA process of our major physical sites and commissioned research into consultation and engagement mechanisms. We are now working with the South East regional centre of excellence in regeneration to promote best practice in equality promotion through physical development and design.

9. CONSULTATION

This document will go out for consultation with key regional stakeholders for 12 weeks from 6.02.09 to 1.05.09. During that time we will be consulting in a number of ways:

- An online questionnaire.
- Follow up with business support, Local Authority Contacts and third sector agencies to obtain relevant subregional information.
- Internal consultation with our staff through internal briefing
- Review by an internal group of staff, with interest in ethnic minority perspectives

10. CURRENT SEEDA ACTIVITIES

Our action plan outlines the detail of how we will address race equality in our internal and external functions. However, we have already made significant progress and outline some key examples of activities below:

1. Increase the economic participation rates of ethnic minority communities from 68% to 79.1% by 2020.

EXODUS – The EXODUS programme is an innovation research project covering the London and South East Prison and Probation service areas. Over the last 3 years it has supported approximately 900 ex-offenders in a process of rehabilitation and re-engagement in employment. The programme supports prisoners on release to overcome discrimination through support in finding housing, overcoming drug and alcohol problems and providing intermediate labour market programmes as a stepping stone to reintegrating into mainstream employment.

ESF Research Programme: SEEDAs 2004-2007 European Social Fund Co-finance Implementation plan included a strategic theme on Harnessing Diversity. The programme has undertaken a wide range of research and pilot activities including funding a regional research programme into promoting gender equality in the workplace and supporting disabled and BAME community entrepreneurs.

Built environment professions and diversity – SEEDA has commissioned and published a research project looking at the skills needs of the region in relation to the Built Environment. It outlines the need to build diversity into the recruitment and retention processes of the built environment sector. It outlines the barriers to minority groups participating in the sector and makes recommendations for actions. It forms the first stage of a wider piece of work to increase the level of diversity in the profession in the region.

2. Decrease the number of households not earning a living wage from 630,000 in 2008 to 400,000 by 2020.

Regional Financial Inclusion Strategy – Over the last three years SEEDA has been developing a range of activities to support access to finance for the regions most deprived communities. In 2009 SEEDA will launch the region's first Financial Inclusion strategy. This strategy will provide a platform for the development of a joined up, regional infrastructure for the delivery of personal and enterprise financial inclusion products and services.

Regional Living Wage Methodology – A key sub component of the financial inclusion strategy is the development of Living Wage standards across the region. This process will enable SEEDA to reassess the definition of those groups living below acceptable income levels by including the variable cost of living rates in the region. This methodology will support SEEDA in lobbying HM Treasury for benefit flexibilities and freedoms, supporting the most economically vulnerable to have a successful transition back into work. The methodology will also be used to champion public sector endorsement of living wage standards for public sector workers, and the passing on of these standards to the private and third sectors through the public procurement process.

Inclusive Finance CIC – Inclusive Finance CIC was established in partnership with SEEDA in 2007 to provide enterprise start-up loans to people excluded from traditional forms of finance. The company operates right across the region and provides start-up loans of up to £20,000 to excluded women, ethnic minorities, older people, disabled people and those living in poverty.

3. Roll out race equality support and awareness raising activities to at least 500 employers by 2011.

Business Link and Business Link Enterprise Gateway Service – The Business Link Enterprise Gateway Service was reconfigured in 2007 to focus primarily on the needs of excluded groups in the region. This process has included the commissioning of a transformational business support programme. This programme will help enterprise directors to gain the tools to best support women, ethnic minorities, disabled people etc to start up and grow businesses.

Business Link Corporate Social Responsibility Programme: SEEDA is currently developing advice and support packages for SMEs relating to best practice in equality and diversity. This includes the delivery of workshops for employers wishing to adopt best practice and ensure legal compliance to the race equality duty and best practice.

Anti- Discrimination Networks – SEEDA has supported the development of a range of anti-discrimination networks and information programmes in the region, including the South East Multi Ethnic Development Agency (SEMEDA) and UNI, a regional race equality network.

4. Use SEEDAs regional knowledge base and influence to encourage other organisations to address race equality issues in social policy areas connected to successful economic growth (ie. Health, Access to services etc).

Regional Data and Analysis - In order to enhance SEEDA's existing efforts to comply with the various Equality Schemes and the emerging Single Equality Act, we have commissioned a comprehensive mapping of socio-economic data for the six core equality groups against their communities of geography and interest. This has been developed into an Equality and Diversity data tool to enable internal staff and colleagues in partner agencies (public, private and 3rd sector) to access baseline data on these groups to inform their project planning and EIAs. As part of this project, we have also gathered statistical data on the prevalence, geography and economic impact of mental health conditions in the region.

Strategic Influencing - SEEDAs Culture, Communities and Consumers team currently have a regional seat on a number of strategic policy boards. The role of the team is to ensure that these regional strategies consider equality and diversity issues in all of their activities. They include:

- The regional mental health and employment strategy.
- The regional health strategy
- The regional homelessness forum
- The regional forum on ageing
- The women's enterprise strategy board
- The regional strategic partnership on migration
- The 2012 Olympic and Paralympic Communities sub group.

In some cases, such as the 2012 sub group, the Culture, Communities and Consumers team also provided strategic support to the Equality Impact Assessment process.

5. Ensure all SEEDA funded projects and programmes support Race Equality, through the strategic use of Equality Impact Assessment and the enforcement of the requirements of the Race Equality Duty through procurement.

Equality Impact Assessment Processes

SEEDA's role as a commissioner of projects and programmes puts it in a unique position to influence the design of regional programmes in a positive way. Over the last two years, we have integrated the principles of equality impact assessment and monitoring throughout our project development process. This includes:

- An initial equality impact assessment (EIA) checklist process at the outset of project development.
- A more in depth EIA process for projects that are identified as having the potential for negative impacts on groups identified within equality legislation.
- Equalities training for project managers, to assist their advisory roles to devolved delivery partners.
- Equalities guidelines within wider evaluation procedures for projects and programmes.

Strategically, SEEDA's Equality Impact Assessment flows from the Equality Impact Assessment of the Regional Economic Strategy. This has led onto the creation of a strategic, ongoing EIA process which is cascaded through the individual Target Action Plans of the RES implementation plan and for SEEDA, through an EIA of the Corporate Plan.

This approach encourages target leads and directorates to ensure that policy and programmes have been fully Equality Impact Assessed at each stage, with an ongoing requirement for those staff responsible for the implementation of Corporate Plan Objectives to ensure that Equality considerations are built into programme design.

When it is operational, SEEDA's Central Programme Office will take on responsibility for screening and monitoring equalities in relation to projects and programmes.

Procurement

We recognise that the procurement process is integral to encouraging race equality in our own internal functions. Procurement is an important gateway for many businesses and individuals who can assist us in the delivery of small and large scale projects and activities which constitute a large part of our core business activities.

The development of the Race Equality Scheme enabled us to evaluate the way we currently monitor race equality as part of the procurement process. There is considerable scope for us to introduce new and meaningful equality monitoring which can be used to aid both the marketing of large and small scale tenders and aid the strategic planning process in relation to procurement activities.

We do not currently monitor the diversity of contract bidders and therefore will ensure that new systems are put in place to capture key data. This will help us to identify and address any inequality. Our commitment to equality will also see us exploring and introducing new equality criteria for tender bidders to ensure that we work with businesses and organisations that can demonstrate their commitment to Equality and Diversity.

SEEDA will be developing a regional framework for work for encouraging and promoting Supplier Diversity in the South East that adheres to the aspirations set out in the Regional Economic Strategy and the needs of our diverse communities. Using regional evidence, the Supplier Diversity framework will seek to ensure private and public sector procurement managers adopt fair and transparent procurement practices and in doing so, broaden their supply chain activities and generate new forms of wealth creation for under-represented groups.

11. Race Equality Action Plan 2009-2012:

REF	OBJECTIVES	Who	Outcomes	Target Date
Increase the economic participation rates of ethnic minority communities from 68% to 79.1% by 2020				
	Support economically inactive people from key target groups to overcome their own tendency to self exclude because of common mental health issues (depression, anxiety etc) by joining up the NHS Access to Psychological Therapies programme with pre-employment support programmes delivered through the Regional Skills for Productivity Alliance members.	Employment and Skills Team	Reduction in self exclusion	2009
	Support employers to overcome discriminatory barriers in recruitment practice in employing the long term unemployed, over 50s, ethnic minorities etc through the provision of information and resources about legal compliance and best practice and the promotion of the business case for diversity.	Business Link/ CSR programme	More employers willing to employ currently unemployed groups.	2009
	Gain a better understanding of the benefit based barriers to entry to the workforce in the South East through a dedicated research programme.	CCC Team	Benefit barriers understood and solutions identified with key partners	2009
Decrease the number of households not earning a living wage from 630,000 in 2008 to 400,000 by 2020				
	Develop a regional financial inclusion strategy, addressing the regional infrastructure needed to support women and men on low incomes. Specifically in relation to personal debt and credit, financial planning awareness.	CCC Team	More ethnic minority communities able to get out of debt and in to work through accessing information, advice and capital through Community Banking mechanisms	Strategy launched 2009 Implementation ongoing.

	Integrate Train to gain into the simplified business support offer, to encourage employer based learning by providing funding and improving the delivery of skills development. The Action for Business Colleges Programme will ensure that training providers and education institutions are capable of delivering skills and training solutions to meet the needs of businesses. Training pools will fund employer-led partnerships to address higher level skills needs within their sector and or supply chain. Co-ordinate the development of improved access to vocational training and work based learning brokerage systems, enabling women to access training for in work progress. Training provision developed in partnership with SEEDA will ensure that it applies the principles of the Leitch and Freud Reviews of Education and Welfare reform and proactively target BAME populations onto courses. Undertake a full Equality Impact Assessment of the new Business Link Invitation to Tender for the contract for Business Link from April 2010.	Business Support	Employers given greater access to support	Ongoing throughout the lifetime of the RES
			New Business Link programme fully attuned and equipped to engage and support diverse groups.	January 2009
Roll out race equality support and awareness raising events to at least 500 employers by 2011				
	Position Business Link as the primary access channel to publicly funded business support and ensure that Business Link is accessible and relevant to ethnic minority communities. Evidenced by all providers achieving the "Committed to Equality" accreditation and achieving or working towards other appropriate accreditations, such as Prowess Flagship status.	Business support	Increase in the proportion of Business Link Customers engaging with BL from ethnic minorities and an increase in the number of business start-ups from ethnic minorities.	2010

	Capacity build business support providers to be able to reach women from disadvantaged backgrounds, the over 50s, disabled and from ethnic minority communities.	Enterprise Team	More women from disadvantaged backgrounds accessing business support	2010
Use SEEDAs regional knowledge base and influence to encourage other organisations to address race equality issues in social policy areas connected to successful economic growth (ie. Health, Access to services, physical development etc)				
	Recruitment of a paid expert equality advisors panel to advise SEEDA on a wide range of strategic equality issues.	CCC Team	VCS able to communicate the views of diversity groups into regional policy	Ongoing
	Develop a bank of good practice resources and sign posting to advice agencies relevant to the built environment on diversity.	Enabling Infrastructure		Ongoing (South East Excellence website content commissioned to include diversity requirements)
Ensure all SEEDA funded projects and programmes & internal processes support race equality, through the strategic use of Equality Impact Assessment and the enforcement of the requirements of the Race Equality Duty.				
	Ensure that SEEDA gains a holistic view of key services and policy areas in relation to equality through the creation of an expert equalities panel to scrutinize and advise on regional policies and programmes.	CCC Team	Expert scrutiny provided in decision making	February 2009
	SEEDA will establish performance standards for its own development projects. These will incorporate mechanisms for addressing diversity E.g. adoption of lifetime homes standard, commitment to inclusive design principles etc.	Enabling Infrastructure	Equality Considerations integrated into design	2009
	Provide staff with specific tools, resources and advice on how diversity relates to the built environment, to enhance the corporate training programme	Enabling infrastructure		Minimum of 2 internal expert briefings in 2009.
	We will explore ways of improving our monitoring of SEEDA's	CCC team and		2009

	procurement to identify percentages of contracts going to equalities groups. We will prepare for legal changes following the Equality Bill and work to develop a Single Equalities Scheme	procurement CCC Team and Procurement		2009
	Develop an ongoing EIA of the Regional Economic Strategy, its implementation plan and the SEEDA corporate plan, taking full account of race equality. All staff to have completed equality impact assessment training. Workshops to be held to support directorates to set equalities targets for external project/programmes/ policies. Explore ways in which we can attract tender bids from ethnic minority led businesses and organizations To explore ways in which we can ensure greater tie in between the EIA appraisal process in project development and the contracts that result. Identify contracts for which race equality is a core requirement and include this in the specification for the contract, using EIAs where necessary. We will ensure that contractors fully understand any equality requirements of the contract. We will monitor the way the contract is fulfilled in respect of equality, where relevant.	Directors Group. HR & Performance Management Performance Management CCC team. Procurement Project Managers Contract Managers contract managers	Strategic Equalities Framework Developed Equalities understanding translated through all functions of the agency	Outline framework from sub groups June 09 2009 2009 December 2009 2009 2009 Ongoing Ongoing

	Continue to collect, monitor and report on the ethnicity of all staff via new HR system Continue to review and update HR policies and procedures; Undertake Equality Impact Assessments, utilizing the 8 areas of statutory compliance for public agencies, data gathering, target setting recruitment, training, communication, procurement, monitoring and review and consultation. Comprehensive review of recruitment processes, implementing monitoring and reporting on success of applicants through interview and appointment stages. Review and amend (if appropriate) recruitment advertising strategies to ensure vacancies reach the wider population. Ongoing review of requirement for BME support group Continue to respond effectively to complaints of racial discrimination and harassment.	Human Resources Human Resources. Human Resources Human resources Human Resources Human Resources	Up to date data available on request. Up to date policies and procedures We aim to ensure SEEDAs staff reflects the diversity of the SE region We aim to ensure SEEDAs staff reflects the diversity of the SE region. Create a group as required Record the number of incidents and outcomes	Immediate ongoing Immediate ongoing 2009 2009 ongoing Immediate ongoing

	Create and implement an equality and diversity training plan focusing on: Staff awareness to Equality and Diversity legislation and its application. Staff responsibility to respect on another in line with SEEDAs values and policies. Requirement for staff to develop positive working partnerships outside of SEEDA Capability for all staff to carry out Equality Impact Assessments within their own area of work, utilizing the 8 areas of statutory compliance for public agencies, data gathering, target setting, recruitment, training communication, procurement, monitoring and review and consultation. Continue to monitor and report on staff attitudes and awareness of Equality & Diversity through annual staff survey.	Human Resources	Staff trained	2009
		Human Resources	Up to date data available on request	Immediate, ongoing

12. Implementation, Monitoring and Review.

SEEDA recognizes that the Race Equality Scheme has to be a 'living' policy to be effective, and will therefore keep it constantly under review and regularly monitored. SEEDA will seek to ensure that the Scheme is publicly updated on an annual basis and that all action plans, guidance and standards set out in the scheme are subject to monitoring and assessment.

The key driver to the achievement of the actions contained in this Race Equality Scheme is the leadership and ownership of the scheme at the highest level. The agency will seek to mainstream equalities considerations through the use of the organization's Equality Impact Assessment process which is outlined at appendix 8.

Leadership will be driven primarily by the SEEDA Board and Chief Executive. SEEDA has created a Board position to lead on all aspects of equality and diversity for the Agency with an Executive Director responsible for Equality and Diversity at the operational level.

The drive for the implementation, monitoring and review of the externally focused aspects of the Race Equality Scheme will come from RES Cross Cutting Advisory Group on Equality and Diversity which will be formally operational in 2009. Internal focused activities will be driven by the HR director who will have reporting responsibility to the Executive and Non Executive Boards. Both the HR Director and the RES Cross Cutting E&D group will be supported by the Culture, Communities and Consumers team in the Sustainable Prosperity Directorate.

The board will be updated on key internal and external facing issues through quarterly submissions to the Agency's Board Report. The Scheme itself will be formally reviewed in its entirety at least every two years. This process will include refinement and changes to the scheme to ensure its continued effectiveness and ability to improve SEEDA's approach as an organisation to Race Equality.

Responsibility for operational delivery of the Race Equality Scheme rests across all Divisions of SEEDA. Each Executive Director has responsibility to ensure that their staff has appropriate skills and knowledge of Equality and Diversity policy at the corporate level.

In addition, the action plan of the Race Equality Scheme will be integrated into the corporate planning cycle of the organization. Integrating the plan into the wider Corporate Plan enables divisions to build in resources to address Equality and Diversity at an organizational level.

APPENDICES

APPENDIX 1

SEEDA's DELIVERY MODEL.

SEEDA is arranged around 6 Directorates.

- Strategy
- Global Competitiveness
- Smart Growth
- Skills and Sustainable Prosperity
- Infrastructure and Development
- Resources

These Directorates deliver 4 core business areas:

1. Corporate Functions - These are the functions of running the 'day to day business' of being a public agency they include:

- Human Resources
- Procurement
- Performance Management Systems
- Corporate Strategy
- Finance

2. Direct Delivery - SEEDA delivers a number of projects directly within the region. This means we are responsible for managing the design and implementation stages. This is the smallest proportion of our activity.

3. Devolved Delivery - The majority of our work is delivered on our behalf by our partners. Our role here is to identify areas of need through evidence building and partnership based strategy development, to commission partners to deliver and to monitor impact via evaluation and output collection.

4. Strategic Influencing - Another significant area of work is our co-ordination and strategic influencing role with the wider Public, Private and Third Sector. Our functions here focus on using our unique position and expertise to communicate and negotiate to achieve our wider policy aims.

SEEDA and the Regional Economic Strategy

As the Regional Development Agency for the South East, SEEDA has a statutory duty to prepare a Regional Economic Strategy (RES). The RES is the guiding document for economic development for the region. SEEDA has a key leadership role in the implementation of the RES, with the success of the strategy dependent on joint working and partnership across the regions key agencies.

The RES covers three strategic areas of interest:

- **Global Competitiveness**
- **Smart Growth**
- **Sustainable Prosperity**

These three areas of priority are delivered within the context of five cross cutting themes which have to be integrated across the approach to implementation. These themes are:

- Culture, sport and the creative industries
- Equality and Diversity
- Rural Areas
- Europe
- ICT and connectivity

APPENDIX 2

REGIONAL DIVERSITY DEMOGRAPHICS

Male Female Ratio

- There are 8.237 million residents in the South East of which 4.028 (48.9%) million are male and 4.209 (51.1%) million are female.

Age

- 22% of our population are aged 24 or under. Of which 48.68 % are women and 51.32 % are men.
- 47.6% of our population are aged between 25 and 59. Of which 50.62 % are women and 49.08 % are men.
- 22% of our population are aged over 60. Of which 55.27 % are women and 44.73% are men.

Ethnicity

2001 census data tells us that in the South East:

- 4.9% (approximately 400,000 people) of our population was from non white ethnic origins of which the largest ethnic minority communities were from mixed, Indian and Pakistani backgrounds. These communities also tend to have younger age profiles.

Faith

- The largest affiliation to a religion in the South East is to the Christian Faith at 72.78% of the population.
- 16.5% of the population state they have no religion.
- 1.36% are affiliated to Islam
- 0.47% affiliated to Sikhism
- 0.56%affiliated to Hinduism and;
- 0.24% affiliated to Judaism.

Disability

- 844,000 people of working age in the South East have an impairment.
- Disability rates in the region increase with age, only 9% of adults aged between 16-24 have an impairment compared to 44% of the 50 and over age group.

Appendix 3

Glossary of terms

Affordable Housing: subsidised housing at below market prices or rents for those households who cannot afford market housing. Usually managed by a registered social landlord, generally a housing association

Asian: refers to people who self define as being Asian, East African Asian, British Asian or originate from India, Bangladesh, Pakistan, Sri Lanka, Nepal or China.

Bisexual: a man or woman who is emotionally, physically and/or sexually attracted to both men and women.

Black: is an inclusive term that refers to all ethnic groups who have a common experience of discrimination on the basis of their skin colour. It also includes those who self-define as black. In relation to statistical data collection, such as the census, black has been more narrowly defined to refer to people who self define as any of the black or black British categories which are: African, Caribbean, or black other.

Disability: the Disability Discrimination Act defines disability as 'a physical or mental impairment, which has a substantial and long term adverse effect on a person's ability to carry out normal day to day activities'. However, disabled people's organisations prefer a social approach, which defines disability as 'the loss or limitation of opportunities that prevent people who have impairments from taking part in the life of the community on an equal level with others due to physical and social barriers'.

Disabled person: (people) a disabled person is someone who has an impairment, experiences externally exposed barriers and self-identifies as a disabled person.

Diversity: the differences in the values, attitudes, cultural perspectives, beliefs, ethnic backgrounds, sexuality, skills, knowledge and life experiences of each individual in any group of people. This term refers to differences between people and is used to highlight individual need. It can be used inappropriately as an alternative to equal opportunities. It avoids reference to discrimination and the impact that power imbalances have on different communities.

Equalities: used as a short hand term to refer to all work addressing issues of discrimination and disadvantage, particularly as it relates to race equality, disability, gender, sexuality, faith and age.

Equality: the vision or aim of creating a society (or aspects of society) where power and quality of life is shared equally and both individuals and groups are able to live their lives free from discrimination and oppression.

Equal Opportunities: the development of practices that promote the possibility of fair and equal chances for all to develop their full potential in all aspects of life and the removal of barriers of discrimination and oppression experienced by certain groups.

Ethnicity: an individual's identification with a group sharing any or all of the following: nationality, lifestyles, religion, customs and language.

Gay: this term is used when referring to gay men or women. The word 'homosexual' is clinical in origin (implying a condition or illness) and is usually viewed as an offensive term by gay people. The word 'gay' is normally attributed to men. However at times it can be used as an all-encompassing term for gay men, lesbians, and bisexual people.

Gay man: a man who is emotionally, physically and/or sexually attracted to men.

Gender: a concept that refers to the social differences between women and men that have been learned, are changeable over time and have wide variations both within and between cultures. The term is often used to differentiate from 'sex' which refers to biological differences.

Homophobia: is fear or dislike of an individual or group of individuals because they are perceived not to conform to what is viewed as normal masculine or feminine behaviour. The term has come to refer particularly to fear and hatred of homosexuals and homosexuality.

Lesbian: a woman who is emotionally, physically and/or sexually attracted to women. Not all women are comfortable with the term lesbian and some choose to identify as either gay or a gay woman.

Minority ethnic people: this term is widely used as a general term to refer to people who belong to an ethnic group numerically smaller than the predominant white group in the UK. This includes groups distinguished by their skin colour, as well as others, such as Irish, Turkish, Cypriot, Jewish and traveling people [travellers/Romany].

Regeneration of an area includes, securing that land and buildings are brought into effective use; contributing to, or encouraging, economic development; creating an attractive and safe environment; preventing crime or reducing the fear of crime; providing or improving housing or social and recreational facilities, for the purpose of encouraging people to live or work in the area or of benefiting people who live there; providing employment for local people; providing or improving training, educational facilities or health services for local people; assisting local people to make use of opportunities for education, training or employment; benefiting local people who have special needs because of disability or because of their sex or the racial group to which they belong.

Regional Development Agencies: these are Non-Departmental Public Bodies, sponsored by Central Government Departments, for the development of each of the UK's regions. They are particularly involved in site acquisitions towards securing the development, growth and regeneration of areas which are intense in Brownfield land and / or require large-scale remediation, such as in the Thames Gateway

Regional Economic Strategy: it is the Framework within which every Regional Development Agency (RDA) works. This Strategy is produced every three to four years in consultation with a wide range of stakeholders and defines the region's priorities and targets for the work of all the partners in its delivery – public, private and voluntary

Sexuality: sexuality is a person's emotional, physical and/or sexual attraction, and the expression of that attraction. It is not a choice that people make; rather sexuality is something that people are born with. Sexuality refers to both gay and heterosexual (or 'straight') people.

Social Inclusion: the position from where someone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers for people or for areas that experience a combination of linked problems such as unemployment, poor skills, low incomes, poor housing, high crime environments, poor health and family background.

Trans people: people who have the desire to live and be accepted as a member of the opposite sex (men who feel they should have been born a woman and vice versa). Other terms commonly used are Trans man (female to male) and trans woman (male to female). Issues of Trans gender relate to self-identity.

SME's – small to medium sized enterprises

In general, statistical definitions of an SME use one or more of three defining measurements; the number of employees; turnover and the size of the balance sheet.

Or

A stipulation of the European Regional Development Fund Grant is that potential beneficiaries are, amongst other things a Small to Medium Sized Enterprise. SME's are companies that employ less than 250 people, have a turn over of less than €50 million (or a balance sheet total of less than €43 million), and not more than 25% owned by a non-SME.

Abbreviations

ABC	Asian Business Council
BAME	Black, Asian and minority ethnic
BME:	Black and minority ethnic
CEHR	Commission for Equality and Human Rights
CIOB	Chartered Institute of Building
CRB	Criminal Records Bureau
DCLG	Department for Communities and Local Government
EQIA	Equality Impact Assessment
EOC	Equal Opportunities Commission
ESF	European Social Fund
FEW	Funding Enterprising Women
EU	European Union
GES	Gender Equality Scheme
GOR	Government Office Regions

GOSE	Government Office for the South East
HR	Human Resources
JIVE	Joining Policy, Joining Practice
JC+	Job Centre Plus
LIDP	Local Infrastructure Development Plan
PFI	Private Finance Institute
PROWESS	Promoting Women's Enterprise Support
RAISE	Regional Action and Involvement South East
RCIS	Royal Institute of Chartered Surveyors
SDA	Sex Discrimination Act
SEEDA	South East England Development Agency
SEMEDA	South East Multi-Ethnic Development Agency
SECT	Science, Engineering, Construction and Technology (SECT) sectors
SET	Science Engineering and Technology
TEK	Technology Enterprise Kent
UKRC	UK Resource Centre for Women
WAMT	Women and Manual Trades
VCO	Voluntary or Community Organisation

Appendix 4

EQUALITY IMPACT ASSESSMENT PROCESS

SEEDA'S Equality Impact Assessment process has three levels of assessment:

1. • **Initial Assessment/Screening**
2. • **Partial EIA**
3. • **Full EIA**

The reason for the three levels is that the complexity and diversity of SEEDA's functions means that a full assessment may not be necessary in every case, nor may it be appropriate to conduct a full assessment initially. Using the three levels enables a reasonable, practical and manageable approach to the process of EIA throughout the agencies functions.

- 6.8 It must be remembered that which ever level is undertaken, it must be **proportionate** to the likely impact of the item under consideration. The more **substantial** the impact on the community the more in-depth the EIA will be.

6.9 The Initial Assessment or screening

- 6.9.1 This will play a valuable role in new project, policy or function formulation, or when considering changes to an existing project, policy or function and will be carried out in all cases. It is effectively a tool for deciding whether or not the project, policy or function needs a more in depth analysis. The main difference between the initial assessment/screening and a partial EIA is that it is based on what information we already have/what we already know in relation to the policy and will identify where more information is needed.
- 6.9.2 Before embarking on an EIA, it is important to determine the aims of the project, policy or function. From this point it is possible to determine the EIA's terms of reference and whether a partial or full assessment is necessary.
- 6.9.3 On those occasions where one or more public authorities share responsibility for a project, policy or function then necessary arrangements will be put in place and they should then co-operate in carrying out an EIA.
- 6.9.4 Where SEEDA has an involvement in the service delivery of a project, policy or function which is set elsewhere it will not be appropriate to disregard this involvement. As an EIA proceeds it may become apparent that certain activities are associated. Where this is the case then it may be appropriate to link the EIA's of these activities.
- 6.9.5 The proposed holistic EIA initial assessment proforma is included at Annex 1.

6.10 The Partial Impact Assessment

- 6.10.1 A Partial Impact Assessment will build on an Initial Assessment, will outline risks and benefits, and will include the advice of experts and interested groups.

- 6.10.2 The Partial Impact Assessment is very similar to the Initial Assessment of a policy and will be undertaken if the Initial Assessment points to the possibility of unjustifiable differential impact on relevant groups. The Partial Impact Assessment will build on the Initial Assessment and explore the risks and benefits of the project, policy or function taking into account the advice of experts or interested groups.
- 6.10.3 The Partial Impact Assessment will have to clearly state the risks associated with the project, policy or function in relation to differential impact and weigh these against the benefits that the activities may have.
- 6.10.4 The partial EIA will invariably be used when there is not much information available on the topic in question and it is felt that more information obtained through informal consultation with relevant groups/experts will lead to a more informed decision about the project, policy or function. This type of assessment will also be of use when much of the activity is outside the control of SEEDA and information needs to be obtained from the other interested parties concerned with the project, policy or function. Should the Partial Impact Assessment point to a real concern about the activities in terms of differential impact which is echoed by the views of the experts/relevant groups, then it will be necessary to undertake a Full EIA.
- 6.10.5 Inevitably due to the Partial EIA being more involved than the Initial EIA, the information in the Partial EIA should be more comprehensive than that given in the Initial EIA.

6.11 THE FULL EIA

- 6.11.1 The Full EIA is a natural progression from the Partial EIA and will be undertaken if, after the Partial EIA, there are still real concerns about the project, policy or function in terms of differential/adverse impact which is echoed by the views of the experts/relevant groups.
- 6.11.2 The full EIA will build on the analysis of the Partial EIA but will be expanded in light of formal consultation, further research and data collection and further analysis. It will also state clear recommendations as to what changes or amendments have occurred to the project, policy or function in light of the EIA.
- 6.11.3 A full EIA should be undertaken in eight key stages which are listed below:
1. Identify the aims of the project, policy or function and how it is to be implemented
 2. Consideration of relevant data and research
 3. Assessment of impacts
 4. Consideration of measures
 5. Formal consultation on the actual impact of existing projects, policies or functions and the likely impact of proposed activities

6. Make a decision in the light of data, possible alternatives and consultation
7. Monitoring for adverse impact in the future and publication of the results of such monitoring
8. Publication of results of the Equality Impact Assessments

APPENDIX 5

SEEDAs Complaints Procedure

Complaints and Comments Policy

The South East England Development Agency (SEEDA) is always interested in the views of businesses and members of the public about our initiatives and how we develop and manage them. We shall listen carefully to any views that are put forward and if problems are identified we shall take remedial action.

What is a complaint?

A complaint for the purposes of this policy is one that relates to:

Any expression of dissatisfaction with the service provided by an SEEDA staff member or person or body acting on behalf of the Agency, and can be verbal or written.

It does not include:

- Dissatisfaction with general Government
- Third party dissatisfaction with a person or organisation applying for SEEDA funding or contract;
- Dissatisfaction about Board Members - the Agency has a separate Code of Conduct for Board Members;
- Complaints that are currently the subject of legal proceedings

Anyone can make a complaint about:

- The quality of service provided
- You were given the wrong information
- You encountered a delay in receiving information
- You were treated unfairly

Complaints can be made in a number of ways:

- By email
- By phone
- In writing
- By filling in a complaint form which can be:
 - o downloaded from our website
 - o collected from our Reception desk

You may wish to try to resolve the matter immediately by telephone. Please contact the person you have been dealing with at SEEDA. They will try and sort out your enquiry promptly, and do their best to put things right.

If you have a comment or complaint about our telephone/reception service because you feel that a member of staff has been unhelpful or discourteous, you can ask to speak to the Facilities Manager. The Facilities Manager will listen to what you have to say and take any appropriate action, as necessary.

SEEDA's Service Commitment

We are committed to providing high standards of service to everyone we deal with. Complaints as well as feedback and suggestions for improvement are welcomed as they help us to review our service performance and identify where it can be improved.

We aim to provide a complaints service that is:

- easy to use
- keeps you informed about the progress of your complaint
- lets you know the outcome of your complaint and the reasons for it
- deals with complaints as quickly and effectively as possible
- helps us learn from complaints to improve our practice

We will monitor and analyse complaints as part of our review of service performance and will regularly review the effectiveness of our complaints procedure to ensure that it remains relevant, credible and robust in its operation.

We also need to listen when people say things are going well or make suggestions about the way we deliver services. Monitoring this information will highlight any problem areas as well as showing areas of good practice.

Persistent and/or vexatious complaint are becoming an increasing problem for public sector bodies and difficulties in handling such complaints can place strain on time and resources and can be stressful for staff who have to deal with these complex and challenging issues. In order to counter this, SEEDA has introduced a policy that deals with persistent or vexatious complaints.

Complaints about Partnerships

If the complaint is about a Partnership e.g. a Single Regeneration Budget (SRB) Partnership you should contact the Partnership Board in the first instance. They should deal with the complaint in accordance with their complaints procedure. If you are still not satisfied with the outcome you should contact the Accountable Body, which is usually the Local Authority for the area in which the Partnership is situated. SEEDA will only get involved as a last resort, where a very serious complaint/allegation has been made; or where you remain dissatisfied with the outcome of your complaint to the accountable body. SEEDA's role will be to mediate between the parties to resolve the complaint.

Stage 1 – Informal

In the first instance, complaints about our services should be dealt with by the SEEDA member of staff who had been dealing with you. Most complaints can be resolved at this early stage.

Complaints can be received via telephone, fax, post, or e-mail.

Our policy is that we aim to acknowledge complaints **within 3-5 working days** and we will aim to resolve the complaint **within 10 working days** from the date of receiving a Stage 1 complaint.

If you remain dissatisfied at the end of the first stage, you can write to the contact person given in the letter you receive. You will have **10 working days** in which to do this, outlining why you are dissatisfied and what outcome you would like to have.

Stage 2 – Formal

If it is not appropriate to contact the staff member direct as referred to in stage 1, or if you are not satisfied with the stage 1 response, you may ask for your request to be reviewed. This will initially be an internal review carried out by officers of SEEDA. A request for a review should be addressed to Robert Crawford, Chief Operating Officer, email: robertcrawford@seeda.co.uk. You will be notified of the outcome within 20 working days.

Robert Crawford
Chief Operating Officer
SEEDA
Cross Lanes
Guildford Surrey
GU1 1YA
robertcrawford@seeda.co.uk

Performance Targets

We aim to acknowledge complaints within **3-5 working days**. We will provide a full response within **20 working days** of receipt unless further investigation is required, in which case we will advise you of the reasons for a delay and provide an alternative timescale for a full response.

Stage 3 – Independent Review

If you remain dissatisfied following the internal review, you should put your concerns in writing to the Information Commissioner (an independent statutory body which oversees the operation of the FOI Act and EIR) for an independent assessment and decision on the handling of your request. Details are available at the **Information Commissioners Office website**, <http://www.informationcommissioners.gov.uk>.

Procedure for Dealing with Vexatious or Persistent Complaints

SEEDA has introduced Information guidelines to allow staff to be able to make an informed decision on how to assess whether complaints are vexatious or persistent based on the application of relevant criteria.

A vexatious complaint falls into the category of a complaint that has been thoroughly investigated and in such cases the complainant will have received a full and detailed response, but notwithstanding that, will remain dissatisfied despite lengthy correspondence and contact from staff within the Agency.

The vexatious or persistent complaint may be referred to the relevant Executive Director, who will then decide how best to deal with the issue.

Where can I get help if I am still not satisfied?

If you are not satisfied with the outcome of our Stage 3 review, you may ask the Parliamentary Commissioner for Administration (The Parliamentary Ombudsman), through your Member of Parliament, to investigate whether you have suffered injustice caused by maladministration.

Your personal information

If you use our complaints procedure, you are agreeing that we can use any personal information you send us for purposes connected with your complaint. We may also disclose your personal information to other individuals and organisations if we are legally required or permitted to do so under the Data Protection Act 1998 or the Freedom of Information Act 2000.

Equal opportunities monitoring

We may use complaints about discrimination to review our policies and procedures to ensure that we offer equality of opportunity and treatment to people of different racial or ethnic origins.

We will monitor the ethnicity of complaints to enable us to ensure that we promote and maintain this commitment. All information will be treated as confidential.

Comments and suggestions

We welcome comments and suggestions as these can help us improve our services. Please send any comments or suggestions via our online form at:
http://www.seeda.co.uk/Contact_Us/Contact_form/