Y Garfan Amrywiaeth a Chynhwysiant
Cyngor Rhondda Cynon Taf, gweithio gyda chi, gweithio gyda'n gilydd

gweithio'nwell
workwell

Diversity and Inclusion Team
Rhondda Cynon Taf Council, working with you, working together

Equality Monitoring Toolkit
A Guide for Managers and Staff

RHONDDA CYNON TAF

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CONTENTS

1.   INTRODUCTION

1.1 Purpose of Toolkit

This toolkit has been designed to help you to understand and undertake equality monitoring within your service area. The toolkit will explain what equality monitoring is and why it is needed, as well as principles and guidance to consider when implementing monitoring in your service area.

1.2. Underlying Principles and Things to Remember

Equality monitoring is an important step in improving equality and diversity, as well as making services more accessible and relevant to our customers.

Equality monitoring allows us to examine the data collected (whether internal or external) and identify areas with discrepancies. This is important, as it can help us make informed investments and decisions.

Using robust data means that we can make tailored adjustments, improve access to services for our customers, and save money on unnecessary or irrelevant changes. We can also use the same data to identify gaps in areas - if data shows that people with a certain protected characteristic (e.g., disability) aren't accessing one of our services or buildings, we can begin investigations to understand why this is (e.g., no accessible access, ramps etc.) and take the necessary measures to improve it.

The same principles apply internally when considering staff levels in different areas and departments. Understanding why we have disproportionately low or high numbers of one or more protected characteristics in a certain area can help us to become a more inclusive and diverse workplace.

When conducting and completing equality monitoring, remember that monitoring is:

- essential to the continued improvement and increased inclusivity of the Council's workforce
- not a violation of the General Data Protection Regulation (GDPR) laws and participation is completely optional
- key to improving your service and making it more accessible for all.

Be aware that people can sometimes view monitoring as intrusive or unnecessary, so it is important to understand and explain the need for equality monitoring. Generally, people are happy to respond to equality monitoring questions providing that enough information on their use and reasoning is given. Assuring respondents that monitoring data is anonymous and not used to discriminate means the data can be as robust as possible, giving a more accurate profile that can be used to make informed decisions.

1.3. Background and Law

The Council have obligations under the Equality Act 2010 and the Public Sector Equality Duty (PSED), contained within the Act, to eliminate discrimination, harassment and victimisation as well as other conduct prohibited in the Act when providing services, whether to staff, residents or service users. Under the Act, the Council must also have due regard to the need to:

- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Part of our duties under the PSED includes the need to periodically identify relevant equality information the Council holds and identify and collect information that the Council does not have. We must also identify and collect information about differences in pay by protected characteristic in order to publish information on disability, ethnicity and gender pay gaps.

The Council also has a Strategic Equality Plan that sets out how we aim to meet our commitment to obligations and additional responsibilities laid out in the PSED and Equality Act. The Strategic Equality Plan (SEP) lays out our current equality objectives and details actions to be taken in order to achieve them. Equality monitoring plays a vital part to achieving several of these objectives.

1.4. What About GDPR?

A common misconception is that equality monitoring is not permitted by the GDPR, or that equality monitoring is 'over-collection' and therefore unlawful.

The GDPR does not prohibit collection of equality data, but rather forces authorities like the Council to consider and justify why and how data is used.

Under the Equality Act (2010), the Council have a legal duty to eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act. Equality monitoring is important to achieve this goal, as it allows us to identify discrepancies and disparities in numbers in certain areas.

Answering equality monitoring questions is voluntary, meaning that staff and service users have the freedom to pick and choose what data they disclose. Data from equality monitoring is always processed and published (where necessary) anonymously to ensure that individuals cannot be identified from the information collected. More information on collecting and processing data anonymously can be found in **section 3.2. – 3.4. of this document.**

It is important to note that the GDPR has clauses regarding the processing of special category data, including the need for personal data to never be used to influence decisions in respect of an individual, nor cause substantial damage or distress to an individual. In light of this, **all equality monitoring MUST be carried out anonymously** to completely avoid decisions about individuals being influenced by this data, or distress being caused by disclosure of sensitive information.

For more information regarding common questions about monitoring, **please refer to section 4 of this document**. Additionally, if you have any concerns or questions, please contact the Diversity and Inclusion Team on 01443 444529, or email us at equality@rctcbc.gov.uk

2. **UNDERSTANDING EQUALITY MONITORING**

    2.1. **What Is Equality Monitoring?**

    Equality monitoring is a two-step process that provides a way to collect data about our staff and service users. Using equality monitoring data allows us to assess who is, and isn't, accessing our services. By identifying gaps in what kinds of people can and cannot access our services, service areas will be able to make more efficient decisions about the services they currently provide and allow for more tailored services in the future.

    Internally, equality monitoring data is essential to examining the Council's progress towards equity and diversity. Staff data is used to monitor our progress in reducing the gender pay gap and creating an inclusive workforce. Additionally, this data can also be used to monitor different pay gaps, like ethnicity and disability pay gaps.

Externally, equality monitoring data can be used to monitor what customers and residents are accessing our services. Just like identifying gaps in access internally, we can analyse data collected from customers to monitor how accessible our services are for specific groups, and make tailored improvements to these services, using collected and analysed data as a foundation.

2.2. Why Do I Need to Monitor?

Equality monitoring is an important part of breaking down barriers of inequality and discrimination. It allows us to understand our staff and customers in more detail.

By collecting monitoring data, we can identify if services and processes are accessible to everyone and start to make adjustments when we find gaps in access.

Not only can we use the data we collect to make targeted adjustments where needed, we can also use equality monitoring to show that we are trying to reach the people that need our services.

Monitoring on its own does not resolve barriers to access or explain why a service is being under or overused by certain groups of people. But it does provide a starting point for highlighting issues and barriers for staff and customers.

Data allows us to set realistic targets on how we can make services more inclusive and accessible and build cases for work that may need to be undertaken. Data can also be used to justify investment as you are able to directly show who can and cannot access your service. Monitoring helps deliver more cost-effective and efficient services by making targeted changes based on data rather than assumption.

Using equality monitoring internally is also important as it can help identify barriers that exist in the employment cycle. By collecting data from recruitment on, we will have a better understanding of the barriers people face and can work to remove these so they do not affect people in future. We can then use tangible data to assess the improvements made to check whether or not they are effective.

Internal data can also be used to assess how effective our policies and practices are for our staff.

Having an effective and robust equality monitoring process also demonstrates our commitment to equality, diversity and inclusion. Using monitoring data to improve customer experience and make employees feel valued enhances our credibility as an organisation and makes us a place where people want to work.

We also have a legal obligation under the Equality Act (2010) and the Public Sector Equality Duty (PSED) contained within the Act to ensure that people don't face discrimination or harassment due to one or more of their protected characteristics. Equality monitoring is a very useful way of demonstrating our compliance with these legal duties.

3.   **WHAT DO I NEED TO MONITOR?**

When conducting equality monitoring in your service area, it is important to assure customers, residents and staff that their data is not being used to discriminate or work against them.

You should only collect information relating to selected protected characteristics contained in the Equality Act 2010. These are[1]:

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

The Council are also collecting data on a person's veteran status and caring responsibilities in order to offer these groups targeted support where needed. Again, these questions are optional and data is not used to penalise.

Due to the sensitive nature of the data that will be collected, it is important that questions are ordered and phrased correctly.

These questions, response options and ordering have been taken from the Equality and Human Rights Commission, Welsh Government and other specialist organisations.

When conducting monitoring, you may decide to select the most relevant questions for the needs of the service. However, if you are conducting monitoring as part of a consultation, or the data will be used for an Equality Impact Assessment, you must ask all questions listed in order to meet due regard requirements contained within the Public Sector Equality Duty.

In addition, if you are asking respondents the 'Sex' question, you must also ask the 'Gender Identity question' and follow best practice wording and ordering.

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[1] For a full list of 9 protected characteristics contained in the Act, please visit the Equality and Human Rights Commission.

Best practice question wording and ordering can be found in section 3.1.1 and the appendix of this document. All monitoring should follow these guidelines to encourage higher response rates.

3.1. Monitoring Best Practice

There are set wordings for each question asked as part of monitoring, as well as set ordering of questions to promote responses.
A best practice monitoring form that can be adapted for your service area can be found in the appendix of this document.

3.1.1. Question Order & Wording

Research has shown that respondents are more likely to complete equality monitoring surveys or questionnaires when questions are ordered in a certain way.

It is generally recommended that the religion, sexual orientation and gender identity be separated, with both the sexual orientation and gender identity questions placed well before the religion question.

Additionally, it is recommended that the national identity question be immediately followed by the ethnicity question, not the other way around.

All response options must be listed alphabetically (excluding 'other' and 'prefer not to say').

The recommended best practice for question order is as follows:

1. Age
2. Sex
3. Gender Identity
4. Sexual Orientation
5. National Identity
6. Ethnicity
7. Disability
8. Religion or belief
9. Caring responsibilities
10. Pregnancy and Maternity
11. Veterans and Armed Forces

Best practice wording for questions can be found on the template monitoring form in the appendix.

3.2. When Do I Need to Monitor?

Equality monitoring can be carried out at any time, both internally and externally. When and how often to monitor is for the service area to decide. You may find it beneficial to embed monitoring into processes such as registration or sign up for a service, or annually in a feedback survey.

You should only undertake monitoring when you know:

- what information you want to find out from the exercise (e.g., to find out the impact of your service)
- exactly how you will use the data collected; this could be for reporting (for example, the Annual Equality Report), performance analysis of a service, recruitment etc.

Monitoring should not be conducted without a clear purpose or use – data should never be collected and stored without use.

The purpose of data collection should be made clear to staff and customers who are expected to complete the monitoring forms.

3.3. Storing Collected Data

In order to comply with the GDPR, data must be stored securely and anonymously, and disposed of in line with your service areas retention and disposal policy.

When using paper forms to monitor, responses should be transferred into a secure digital storage alternative (e.g., Excel spreadsheet, Word document etc.) as soon as possible. While waiting to enter these paper responses into the digital storage, the forms should be kept secure (e.g., in a locked cabinet). The digital record should be kept secure, and access only granted to essential members of staff where needed. Once the paper form responses have been transferred to the digital document, the paper forms should be disposed of using confidential waste.

When monitoring digitally, responses should be kept secure to protect anonymity. Responses for each exercise should be compiled and stored in one area (Excel spreadsheet, Word document etc.) and individual responses should be deleted when this has been completed.

Data should only be kept for as long as necessary and in line with your area's retention and disposal policy.

3.4. Reporting

It is likely that you will choose to report your collected monitoring data – whether internally or externally.

When reporting, it is important to ensure that no one can be identified from data published. This is usually the case in responses with small numbers and sensitive data (e.g., sexual orientation, gender reassignment).

In cases where responses are very low compared to other questions, the small response should not be reported.

Example

> **Gender Reassignment.**
> Specific information has not been published due to the possibility of identification.

This is an example of not publishing data due to possibility of identification. Taken from Annual Equality Report 2019-20.

If a respondent has voluntarily identified themselves on a monitoring form (e.g., written their name or email address), this must be kept separate from the responses they gave when stored and published.

3.5. What Can I Use Equality Data For?

Equality data can be used for different reasons and to meet several different reporting requirements.

Ultimately, equality monitoring data can be used to save money and make services more effective. Data can be used to make targeted improvements and changes to processes and services, saving money from assumption-based changes.

Equality monitoring is a key tool for identifying and removing barriers in access to your service. It can be used to identify gaps in who isn't using or accessing your service, as well as seeing who is. Data can also be used to support Equality Impact Assessments.

4. 'HOW TO ASK', COMMON QUESTIONS AND CONCERNS

There are a number of common concerns and questions that people have when faced with equality monitoring. The following highlights a few of these and suggests some possible solutions:

Limited Resources or Capacity

It may seem daunting, but implementing equality monitoring into your service will not take too long. You don't have to reinvent the wheel – embedding equality questions on to the end of a regular survey, for instance, can mean you gather equality data without creating a new data collection system.

Remember that the time taken for customers (or staff) to respond needs to be proportionate to the type of service being monitored. It may not be appropriate to ask a customer to fill out monitoring information every time they call to make a request, or report something online. In this instance, it may be more beneficial to you to monitor a proportion of your customer base as a 'representative sample' and use this group to identify gaps and barriers.

Responses Are Too Low to Justify Equality Monitoring

While small numbers of responses can be frustrating and can make it more difficult to accurately assess access to your service, they can still be used. You can, for example, review why you had a small number of responses and adjust the mode of delivery (e.g., implementing Easy Read, paper forms, face-to-face consultation etc.).

Customers Don't Want to Be Asked

Most people don't object to being asked equality monitoring questions, so long as the reasoning behind the questions being asked is clear and the giving of responses optional.

We must make sure to always explain to customers and staff why we are collecting data, and what the data will be used for.

It is good practice to include a statement like the one below to assure customers and staff about the reasoning behind equality monitoring.

Example statement:

'The Council is committed to the principle of equal opportunities and having a clear picture of the equality profile of our employees/customers can help monitor the effectiveness of our equal opportunities policies and procedures. The information provided is voluntary and anonymous, and will be used for statistical analysis, monitoring and the development of improved services.'

Please note that this is separate from a privacy notice that must be included on monitoring forms in line with GDPR. For more information, please contact the Information Management Team.

If staff or customers have any questions regarding monitoring, they should be answered accordingly. Some people will decide not to respond to equality monitoring, and some will object to these questions being asked. In this

instance, the individual should be assured that responding is optional, and the reason behind collection explained again.

5. QUESTIONS AND CONTACT INFORMATION

If you have any questions, concerns or would like more information on equality monitoring, please contact the Diversity and Inclusion Team on:

Email: equality@rctcbc.gov.uk
Phone: 01443 444529

Best Practice Monitoring Form (adaptable for services) (ONLINE/DIGITAL COLLECTION).

The Council is committed to the principle of equal opportunities and having a clear picture of the equality profile of our employees can help monitor the effectiveness of our equal opportunities policies and procedures. We conduct monitoring in order to identify gaps in access to our services, and make targeted changes where gaps are identified. Data is only used to improve services, and in reporting. You are entirely free to decide whether or not to complete this form and there are no consequences of failing to do so. We do not intend on capturing any personal identifiable information through this form. Please be mindful of this in the responses you provide within the free text areas. In the instance where you do provide us with information about yourself or others, the Council will ensure it will be processed in line with the requirements of the Data Protection Act 2018 and only used for monitoring and reporting purposes.

[**IMPORTANT:** You must place your service area's short privacy notice here, and signpost to the longer privacy notice listed on the Council's website. For more information, please contact the Information Management Team.]

Age

- ☐ 16-24
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-64
- ☐ 65-74
- ☐ 75+
- ☐ Prefer not to say

Sex

Are you:

- ☐ Female
- ☐ Male
- ☐ Prefer not to say

If you prefer your own term, please provide this here: _____
A question on Gender Identity will be asked later.

Gender Identity

Do you identify as:

- ☐ Non-binary
- ☐ Trans
- ☐ Prefer not to say

If you prefer your own term, please provide this here: _____

(Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.)

Sexual Orientation

Which of the follow best describes your sexual orientation?

- ☐ Bisexual
- ☐ Gay man
- ☐ Gay woman/Lesbian
- ☐ Heterosexual/Straight
- ☐ Prefer not to say

If you prefer to use your own term, please provide this here: _____

National Identity

How would you describe your national identity?

- ☐ British
- ☐ Cornish
- ☐ English
- ☐ Irish
- ☐ Northern Irish
- ☐ Scottish
- ☐ Welsh
- ☐ Other (please describe): _____
- ☐ Prefer not to say

Ethnicity

How would you describe your ethnic origin?

- ☐ Arab

- ☐ Asian: British
- ☐ Asian or Asian British: Bangladeshi
- ☐ Asian or Asian British: Chinese
- ☐ Asian: Cornish
- ☐ Asian: English

- ☐ Asian or Asian British: Indian
- ☐ Asian: Irish
- ☐ Asian: Northern Irish
- ☐ Asian or Asian British: Pakistani
- ☐ Asian: Scottish
- ☐ Asian or Asian British: Other East Asian
- ☐ Asian or Asian British: Other South Asian
- ☐ Asian: Welsh
- ☐ Asian or Asian British: Other (please describe): _____

- ☐ Black: British
- ☐ Black or Black British: African
- ☐ Black or Black British: Caribbean
- ☐ Black: Cornish
- ☐ Black: English
- ☐ Black: Irish
- ☐ Black: Northern Irish
- ☐ Black: Scottish
- ☐ Black: Welsh
- ☐ Black, Black British or Black African: Other (please describe): _____

- ☐ English Gypsy
- ☐ Irish Gypsy
- ☐ Irish Traveller
- ☐ Scottish Gypsy
- ☐ Scottish Traveller
- ☐ Welsh Gypsy

- ☐ Mixed/Multiple: African & Caribbean
- ☐ Mixed/Multiple: Black British and White
- ☐ Mixed/Multiple: Black African & White
- ☐ Mixed/Multiple: Black Caribbean & White
- ☐ Mixed/Multiple: East Asian & White
- ☐ Mixed/Multiple: South Asian & White
- ☐ Mixed/Multiple: Other (please describe): _____

- ☐ Roma
- ☐ Sinti

- ☐ White: British
- ☐ White: Cornish
- ☐ White: English
- ☐ White: Gypsy
- ☐ White: Irish
- ☐ White: Irish Traveller
- ☐ White: Northern Irish
- ☐ White: Scottish
- ☐ White: Welsh
- ☐ White: Other (please describe): _____

☐ Prefer not to say

If other Ethnic Group or if you would prefer to use your own definition, please specify: _____

Disability

Do you consider yourself to be disabled?

'The definition of disability as defined under the Equality Act (2010) is '*a physical or mental impairment which has a substantial or long-term adverse effect on the ability to carry out day-to-day activities'*.

☐ Yes
☐ No
☐ Prefer not to say

Religion or belief

What is your religion or belief?

☐ Buddhist
☐ Christian (including Church of Wales, Catholic, Protestant and all other denominations)
☐ Hindu
☐ Jewish
☐ Muslim
☐ Non-religious (e.g., Atheist, Humanist etc.)
☐ Sikh
☐ Prefer not to say

If other Religion or Belief, or if you prefer to use your own definition, please provide this here: _____

Caring Responsibilities

Do you look after, or support family members, friends, neighbours or others because of either: a long term physical or mental condition/disability or problems related to old age?

☐ No
☐ Yes, 1-19 hours a week
☐ Yes, 20-49 hours a week
☐ Yes, 50 or more hours a week
☐ Prefer not to say

Pregnancy and maternity

Are you currently pregnant, or have you been pregnant within the last 12 months?

☐ Yes
☐ No
☐ Prefer not to say

Have you taken (or are you currently taking) maternity leave in the last 12 months?

☐ Yes
☐ No
☐ Prefer not to say

Veterans and Armed Forces

Have you ever, or are you currently, serving in the Armed Forces?

☐ Yes
☐ No
☐ Prefer not to say

☐ I do not wish to provide any of the information requested on this form

Best Practice Monitoring Form (adaptable for services) (PAPER BASED/VERBAL COLLECTION).

The Council is committed to the principle of equal opportunities and having a clear picture of the equality profile of our employees can help monitor the effectiveness of our equal opportunities policies and procedures. We conduct monitoring in order to identify gaps in access to our services, and make targeted changes where gaps are identified. Data is only used to improve services, and in reporting. You are entirely free to decide whether or not to complete this form and there are no consequences of failing to do so. We do not intend on capturing any personal identifiable information through this form. Please be mindful of this in the responses you provide within the free text areas. In the instance where you do provide us with information about yourself or others, the Council will ensure it will be processed in line with the requirements of the Data Protection Act 2018 and only used for monitoring and reporting purposes.

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Age

- ☐ 16-24
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-64
- ☐ 65-74
- ☐ 75+
- ☐ Prefer not to say

Sex

Are you:

- ☐ Female
- ☐ Male
- ☐ Prefer not to say

If you prefer your own term, please provide this here: _____
A question on Gender Identity will be asked later.

Gender Identity

Do you identify as:

☐ Non-binary
☐ Trans
☐ Prefer not to say
If you prefer your own term, please provide this here: _____

(Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.)

Sexual Orientation

Which of the follow best describes your sexual orientation?

☐ Bisexual
☐ Gay man
☐ Gay woman/Lesbian
☐ Heterosexual/Straight
☐ Prefer not to say

If you prefer to use your own term, please provide this here: _____

National Identity

How would you describe your national identity?

☐ British
☐ Cornish
☐ English
☐ Irish
☐ Northern Irish
☐ Scottish
☐ Welsh
☐ Other (please describe): _____
☐ Prefer not to say

Ethnicity

How would you describe your ethnic origin?

Please use the categories and space provided below to specify your ethnicity or ethnic origin:

☐ Arab
☐ Asian or Asian British
☐ Black or Black British
☐ Gypsy
☐ Mixed/Multiple

- ☐ Roma
- ☐ Sinti
- ☐ Traveller/Irish Traveller
- ☐ White

- ☐ Prefer not to say

If you would like to describe your Ethnic Group further, or prefer to use your own definition, please specify: _____

Disability

Do you consider yourself to be disabled?

'The definition of disability as defined under the Equality Act (2010) is '*a physical or mental impairment which has a substantial or long term adverse effect on the ability to carry out day-to-day activities'.*

- ☐ Yes
- ☐ No
- ☐ Prefer not to say

Religion or belief

What is your religion or belief?

- ☐ Buddhist
- ☐ Christian (including Church of Wales, Catholic, Protestant and all other denominations)
- ☐ Hindu
- ☐ Jewish
- ☐ Muslim
- ☐ Non-religious (e.g., Atheist, Humanist etc.)
- ☐ Sikh
- ☐ Prefer not to say

If other Religion or Belief, or if you prefer to use your own definition, please provide this here: _____

Caring Responsibilities

Do you look after, or support family members, friends, neighbours or others because of either: a long term physical or mental condition/disability or problems related to old age?

- ☐ No
- ☐ Yes, 1-19 hours a week
- ☐ Yes, 20-49 hours a week
- ☐ Yes, 50 or more hours a week
- ☐ Prefer not to say

Pregnancy and maternity

Are you currently pregnant, or have you been pregnant within the last 12 months?

☐ Yes
☐ No
☐ Prefer not to say

Have you taken (or are you currently taking) maternity leave in the last 12 months?

☐ Yes
☐ No
☐ Prefer not to say

Veterans and Armed Forces

Have you ever, or are you currently, serving in the Armed Forces?

☐ Yes
☐ No
☐ Prefer not to say

☐ I do not wish to provide any of the information requested on this form

Useful Resources

- [Collecting equality data: Harmonised standards and best practice (Welsh Gov & Statistics for Wales)](#)

- [Equality Information: a guide for listed public authorities in Wales (Equality and Human Rights Commission)](#)