



RACE EQUALITY IMPACT ASSESSMENT

**STRATEGY FOR THE CRE ENGLISH
REGIONS**

JULY 2005

DRAFT

1. Introduction

1.1 The Commission for Racial Equality (CRE) is a non-departmental Public Body established by the Race Relations Act 1976 (as amended) – the 'Act'.

1.2 The key aims of the CRE are to work towards: -

- the elimination of racial discrimination;
- the promotion of equality of opportunity and good race relations; and
- to keep under review the workings of the Act.

1.3 Section 71(1) of the Act places a general duty on listed public authorities, including the CRE to have due regard to the need to eliminate unlawful racial discrimination, and promote equal opportunities and good race relations.

1.4 The general duty is supported by a number of specific duties. The specific duties set out the steps, methods and arrangements public authorities should follow to help them to meet the general duty. One of the specific duties is to set out our arrangements for assessing and consulting on the likely impact of proposed policies.

1.5 The duty to carry out a Race Equality Impact Assessment (REIA), is based upon four guiding principles. The REIA should be carried out on all relevant proposed or new policies, it is obligatory, the approach should be proportionate to the impact of the policy, and it should address each aspect of the general duty.

1.6 To do this the CRE will: -

- Identify relevant proposed or new policies;
- Assess the impact of the policy on all racial groups;
- Consult relevant groups on the impact of the policy; and
- Take appropriate steps to remove discrimination or adverse impact upon any particular racial group(s).

1.7 The impact our policies may have on any particular racial group(s) will be assessed using the following criteria: -

- a) does the quantitative or qualitative data show differences between racial groups?
- b) does the difference between racial groups amount to adverse impact, and for which group(s)?
- c) could the policy be directly or indirectly discriminatory?
- d) if the policy could be indirectly discriminatory, could it still be justified under the Race Relations Act 1976 (as amended)? and,

- e) identify potential policy solutions that will reduce or eliminate any adverse impact.

2. Background of proposed strategy

- 2.1 The proposed policy sets a new strategy to revitalise the Commission's work in the English Regions. It is based on the findings of the review of the CRE's work in the English regions, undertaken by the Hudson consultancy, Commissioner's comments and other information that suggests our presence is not well aligned with the requirements of a changing landscape for equality and race equality in particular.
- 2.2 The proposed policy contains a range of proposals for new ways of working. It includes a proposal to realign our presence in the English regions from three existing offices to nine regional hubs, which could be co-located within the Government Offices, Regional Development Authorities (RDAs) or perhaps Race Equality Councils (RECs).
- 2.3 The review of the CRE presence in the regions, by Hudson consultancy, also highlighted the need to provide a comprehensive and consistent customer service from a single point of entry.
- 2.4 This added impetus to the CRE's proposal to establish a national Information and Assistance Centre (IAC) that will provide a 'one-stop shop' for people contacting the CRE.
- 2.5 The IAC will handle all functions currently carried out by the Information Services team and also take some of those currently carried out by Legal Affairs officers and policy staff.
- 2.6 This race equality impact assessment takes account of the proposal to establish the IAC. However, the proposal to establish the IAC will be race equality impact assessment separately.

3. Purpose and benefits of proposed strategy

- 3.1 The proposed policy is intended to maximise the CRE's capacity to promote race equality across the English Regions. This will have a positive impact for all communities, particularly those suffering the most from inequality and racial discrimination.
- 3.2 The creation of nine regional hubs would enable the CRE to maintain better contact with local communities and public authorities including Government Offices and Regional Development Authorities across England. Benefits of this structure are:
- greater clarity and consistency to the work of regional staff;
 - more capacity to gather intelligence in a focused and systematic way;

- greater influence over local strategic bodies;
- an improved ability to monitor for and enforce non compliance of the race equality duty;
- provision of better intelligence with which to effectively target Section 44 grant aid.

3.3 The primary recipients of this policy are ethnic minority individuals and others who are afforded protection under the Race Relations Act 1976, as amended.

4. The Current English Regions

London & South Region

4.1 The London and South region is the largest of the CRE English regions both by population and land mass. The region stretches North to Bedfordshire, East to Norfolk, West to Gloucestershire and includes the whole of the South East and South West of England.

4.2 The proposed policy recommends the establishment of three regional hubs comprising of 14 staff in total.

The Midlands

4.3 The region stretches North to Derbyshire, East to Lincolnshire, West to Herefordshire and South to Northamptonshire. Cambridgeshire is included in this region.

4.4 In the West Midland ethnic minorities comprise 11.26 per cent of the total population. However, there are significant concentrations of ethnic minority communities in Birmingham, Wolverhampton and Sandwell.

4.5 The proposed policy recommends the establishment of three regional hubs comprising of 10 staff in total.

The North of England

4.6 The region stretches to Northumberland, South to Sheffield, West to Cheshire and East to East Riding of Yorkshire.

4.7 The region has a population of 11.9m, of which 5.33 per cent are of ethnic minority origin. The minority ethnic communities in the region form 16.35 per cent of the total black and minority ethnic communities in the UK.

4.8 The largest ethnic group are Muslims from Pakistan, who comprise 60 per cent of the ethnic minority communities in the region.

- 4.9 The proposed policy recommends the establishment of three regional hubs comprising of 10 staff in total.

5. Race Equality Impact Assessment Process

- 5.1 The CRE is required under the Race Relations Act 1976, as amended to assess each proposed policy for relevance to the general duty under Section 71 of the Act.

- 5.2 A policy is defined as:

“any practice or written document, which sets out a course of action, guiding principles or procedure, which is adopted and implemented by the Authority.”

- 5.3 The CRE’s assessment process consists of three stages:

Stage 1:	Initial screening
Stage 2:	Full impact assessment
Stage 3:	Summary of the Race Equality Impact Assessment (REIA)

- 5.4 To oversee the development and implementation of the proposals a Regional Implementation group was set up. Members of the Regional Implementation group met on a regular basis to discuss the proposals and oversee progress.

- 5.5 The race equality impact of the proposals were discussed at every meeting and action taken to mitigate or eliminate any potential adverse impact identified at all stages of the development of the proposals through the introduction of alternative policy solutions and by analysing the ethnic origin of affected staff throughout the process.

6. Initial Screening Process of the proposed strategy

- 6.1 The initial screening, carried out in May 2005, revealed that the proposed policy was relevant to the duty to promote race equality and a full impact assessment, including consultation was carried out. Details of the initial screening process of the proposed policy are attached at **Appendix 1**.

7. Data and research used in REIA

- 7.1 In conducting the REIA the CRE examined the following data:

- National and regional data on the ethnic composition of the UK
- Section 66 applications for CRE assistance
- Section 66 cases handled by RECs
- Section 44 funded agencies

- CRE workforce data
 - consultation feedback
- 7.2 This data was chosen because at the time of conducting the REIA it provided the most relevant information in assessing the impact of the proposed strategy. Based on the analysis of the above it was considered that there was no additional data in existence that would provide any further evidence in determining the impact of the proposed strategy on any racial group.
- 7.3 Analysis of national and regional data revealed that ethnic minority groups are more likely to live in England than in the other countries of the UK. In England, they make up 9 per cent of the total population compared with only 2 per cent in both Scotland and Wales and less than 1 per cent in Northern Ireland.
- 7.4 The minority ethnic populations are concentrated in the large urban centres. Nearly half (45 %) of the total minority ethnic population live in the London region, where they comprised 30 per cent of all residents.
- 7.5 After London, the second largest proportion of the minority ethnic population live in the West Midlands (with 13 per cent of the minority ethnic population), followed by the South East (8%), the North West (8%), and Yorkshire and the Humber (7%).
- 7.6 The English regions which contained the smallest proportion of the minority ethnic population are the North East and the South West where they made up only 2 per cent of each region's population.
- 7.7 Seventy eight per cent of Black Africans and 61 per cent of Black Caribbean's live in London. More than half of the Bangladeshi group (54%) also lived in London. Other ethnic minority groups are more dispersed. Only 19 per cent of Pakistanis reside in London, 21 per cent lived in the West Midlands, 20 per cent in Yorkshire and the Humber, and 16 per cent in the North West.

Section 66 Applications for CRE Assistance

- 7.8 In 2004, the CRE received 560 applications for assistance. This represents a decrease of 38 per cent, compared with 2003.
- 7.9 Of the 560, 27 (4.8%) were referred to RECs and Race Discrimination Services. This represents a decrease of 49 per cent from the previous year.
- 7.10 London and South received the largest number of applications for assistance, 307 (64%), followed by the North of England 120 (25%) and the Midlands 54 (11%).
- 7.11 It is interesting to note that although London and South receive the largest number of applications for assistance, the North of England

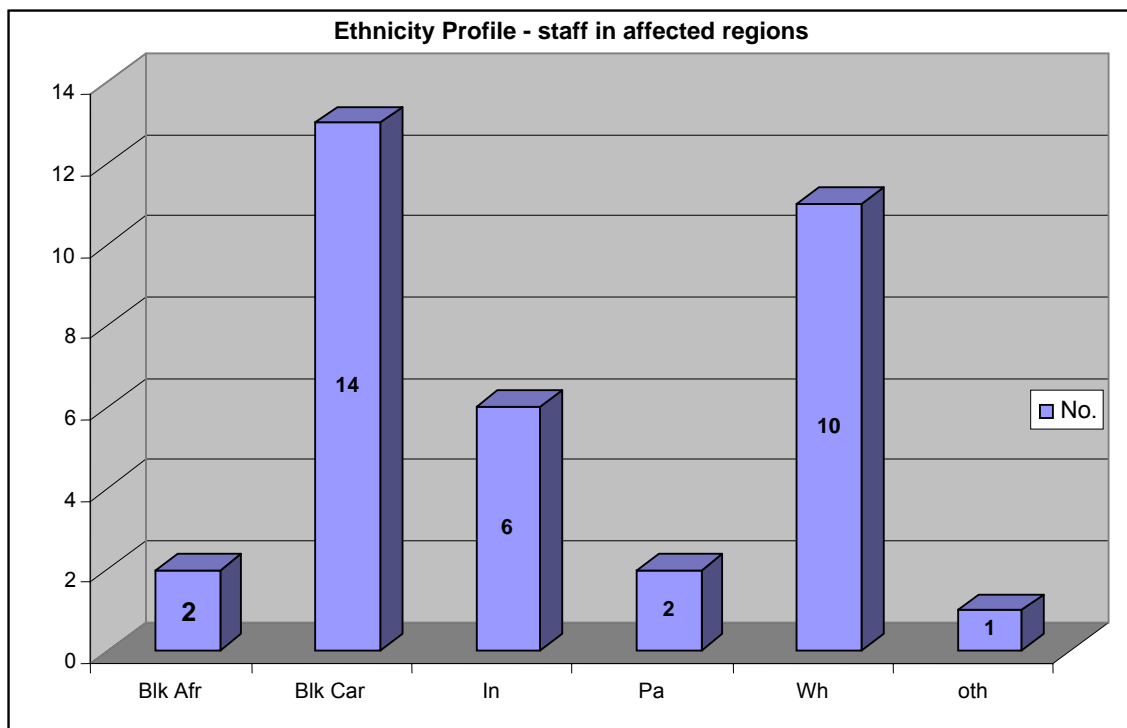
receive the largest percentage of non-employment application (39%) in comparison with London and South (13.6%).

- 7.12 Officers in London and South deal with an average of 25 cases compared with 11 for the North of England and 9.3 in the Midlands.
- 7.13 The proposed policy recommends that one legal officer will be based in each of the key centre of operations in Manchester, Birmingham and one in the South of England.
- 7.14 Given the number of section 66 applications for assistance the Commission receives, it is recognised that initially there may be adverse impact on members of the public who believe that they are victims of racial discrimination in the regions outside of London, as under the proposal there will be only one legal officer at each of the centres of operation.
- 7.15 However, the establishment of the IAC should reduce the number of enquirers currently dealt with by the legal department. This would allow legal affairs officers to focus on complaints of unlawful discrimination, including breaches of statutory duties, explicitly linked to established target areas or priorities.
- 7.16 The Getting Results (Granting Aid) strategy for the next four years should be used to plug any gaps in the availability of casework assistance across the English Regions. This situation should be closely monitored to ensure that the workload of the legal officers in the centres of operation is adequate.
- 7.17 In addition, the CRE will monitor the implementation of this policy on its customers for any evidence of adverse impact. If any evidence of adverse impact is found the CRE will investigate the new policy thoroughly and either revise it or introduce measures to counteract its effects.

Analysis of CRE affected staff by ethnic groups, gender & age

- 7.18 This proposed policy is likely to affect 35 employees who are located in London & South, the Midlands, the North of England and the Communications Directorate. This equates to 18 per cent of the CRE's current workforce that are directly affected by the proposal.

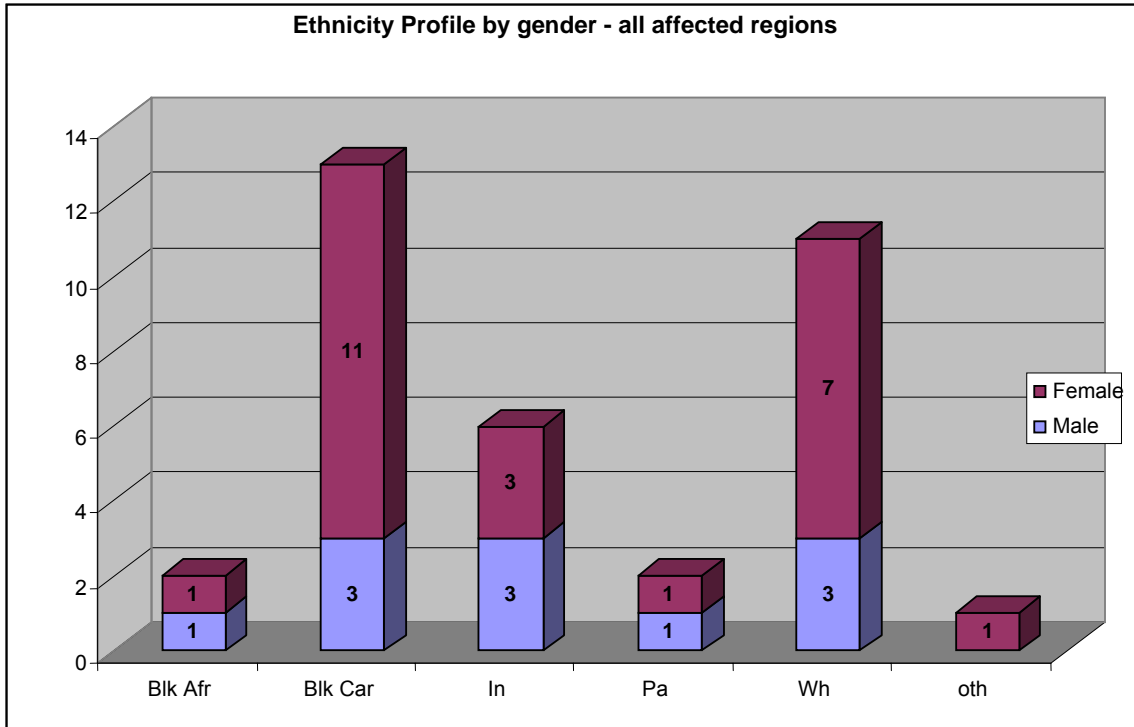
Table 1: Ethnicity Profile of staff in affected areas



7.19 Of these, Black Caribbean employees represent the largest ethnic group (40%), followed closely by White employees (29%). The figure for Black Caribbean employees is greater than their representation in the workforce, which is 25 per cent.

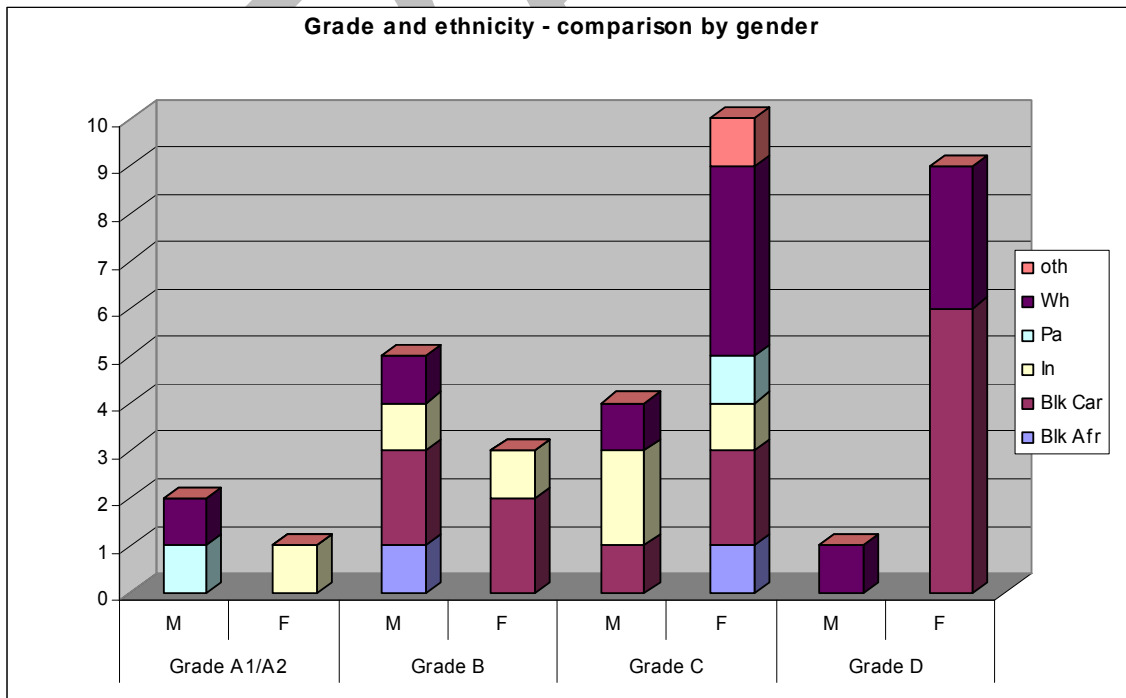
7.20 There is a continuance of this pattern in gender terms, as is seen in Table 2 below, where Black Caribbean (31%) and White women (20%) comprise the largest groups. This equates to 25 and 23 per cent of the workforce respectively.

Table 2: Ethnicity profile by gender – all affected regions



7.21 Within the area affected by the proposed policy, women outnumber their male colleagues by approximately two to one. (Table 3)

Table 3: Grade and ethnicity comparison by gender



7.22 While this may appear to suggest adverse impact on the grounds of ethnicity and gender, further analysis revealed that the group most likely to be affected by the proposed strategy are those employed at

Band D, who would suffer a reduction of three staff if the proposed policy is implemented. All other Bands will increase in size or remain the same if the proposed policy is implemented. Analysis of the staff in Band D did not indicate that certain racial groups would be more affected than others would by the proposals.

- 7.23 At present there are sufficient posts across the regions to assimilate, where possible, the displaced staff at Band D. These employees will also have an opportunity to apply for promotion within the new structure and the IAC.
- 7.24 All existing vacancies in the regions, particularly those at Band C and D, should be frozen or ring-fenced until all affected staff have been assimilated into the new structure.

8. Consultation Process

- 8.1 The draft strategy was sent to over 500 organisations on 11th May 2005. On close of the consultation period, the CRE received 60 formal responses from public authorities, race equality councils, regional development agencies, government offices, trade unions, etc.
- 8.2 In addition, a special event was hosted at the CRE Commissioners Planning retreat at which the CRE Scotland and Wales stakeholder Boards, and the British Federation of RECs were also consulted.
- 8.3 Although the vast majority of the responses were broadly positive, the consultation exercise raised a number of key issues and themes. As a consequence a number of proposals have been amended.
- 8.4 A summary of the key issues and themes arising from the consultation and the CRE's response is outlined below.

Issued raised during consultation	Commission response and action taken to mitigate
1. Resources	
The number of staff proposed for the Information and Assistance Centre (IAC) and Hubs was insufficient for their proposed remit.	Increased the number of IAC staff from 8 to 10
2. Location	
(i) Do regional hubs need to be co-located with other strategic agencies in order to effectively accomplish their remit?	(i) We now propose that current CRE regional offices in Manchester, Birmingham and London should be maintained as key centres of operation.
(ii) Do the advantages of co-location outweigh the disadvantages, and has the rural dimension in hub location been properly taken into account?	(ii) We will take account of the rural dimension when considering the location of satellite offices, particularly in the S.W.
(iii) Where will the IAC be located	(iii) The IAC will be based in Birmingham
3. CEHR	
(i) Why proceed with these proposals given that CEHR is coming?	(i) The CRE has a clear planning horizon between now and its entry into CEHR
(ii) Why not wait until CEHR proposals are finalised?	(ii) We have liaised with the appropriate central government departments on our proposals and have not met with any dissatisfaction on our approach.
(iii) Why bother with these proposals given the CRE's remaining lifespan?	(iii) We are also keeping both the Home Office and DTi informed of progress and developments.
(iv) The proposals should be coordinated with the other equality commissions	(iv) We have consulted directly with both DRC and EOC on our proposals via the CEHR steering group and will continue to liaise with them as appropriate.
4. Specialist and generalist staff	
Regional staff will be de-skilled by the proposal to curtail "specialist" posts in regional hubs, and "generalist" working. There was also the contention that it would be impossible for staff to deliver effectively on the proposed remit of hubs without some "specialist" skills.	<ul style="list-style-type: none"> • It is the intention of the CRE to increase the skills of hub staff through training and experiential learning towards making them multi-skilled. • We now propose that one legal programmes officer will be based in each of the key centre of operations in Manchester, Birmingham and one in the South of England.
5. Governance	
Who will have regional oversight of the strategic approach and direction of hubs?	We will establish stakeholder partnerships and networks for the North, the Midlands and the South of England.

8.5 A full report on the key themes and issue raised by the consultations, and the CRE's formal response is attached at **Appendix 2**.

9. Impact Assessment & Justifiability

9.1 The CRE recognises that where there is discrimination or adverse impact identified in the REIA process, steps must be taken to remove, reduce or mitigate the level of impact.

9.2 There is currently no qualitative or quantitative evidence arising from the REIA that indicates that the proposed policy will have an adverse or differential impact on stakeholders and customers on the grounds of their ethnicity. In fact, there is every reason to believe that, in the long term, the proposed structure may greatly increase the CRE's capacity to advance race equality across the English Regions at a local and regional level because of the increase in the number of hubs and the IAC.

9.3 The proposed policy also gives the CRE a wider geographical spread as it covers the areas with the largest and smallest ethnic minority populations in the England.

9.4 In addition, the CRE currently has a number of ongoing initiatives in place that should help to minimise any adverse impact that may arise. These include:

- i. Getting Results (Granting Aid) strategy, which includes capacity building for local RECs.
- ii. Targeted funding for areas with clear race equality needs.
- iii. Building capacity for local complainant aid networks.
- iv. Developing more self-help guide for complainants.
- v. Working in partnership with local authorities with a view to them providing a better service to the local communities.

9.5 Regarding staff issues, the consultation exercise revealed that the proposals will have a significant impact on staff working in the regions in comparison with their colleagues in Head Quarters because the strategy is primarily focused on building our capacity outside of London and headquarters.

9.6 Although, there is no evidence at this stage to indicate that the impact will adversely affect certain racial groups more than others, there is however, potential for adverse or differential impact in the how the process for selecting staff for re-deployment and promotion is administered.

- 9.7 Care needs to be taken to ensure that the recruitment and selection process is conducted in a way which is fully consistent with good race equality principles and standards. Particular attention needs to be paid to person specifications, job descriptions or work plans for staff working in the regional/satellite hubs to ensure that unnecessary requirements and/or conditions are not imposed that may make it more difficult for certain groups to comply with on racial or other grounds.
- 9.8 Concerns were raised during the consultation that the number of staff proposed for IAC and the regional hubs were insufficient for their proposed remit when compared to the numbers of staff in other NDPBs carrying out similar roles. In response, the CRE has increased the number of IAC staff from 8 to 10, although the workload of these officers will be monitored centrally to ensure resources are adequate.
- 9.9 In addition, the CRE will formulate a virtual work plan for staff working in hubs. This will seek to give further insight and coherence to the proposed remit, and make expectations in this respect more tangible. This will mean that the outcomes and outputs expected of the hubs will be tailored to the resources available therein.
- 9.10 To this effect, the CRE will implement internal processes to monitor the impact of the new strategy on promoting race equality once implemented.

10. Policy Implications

- 10.1 Officers have spent considerable effort and time in addressing the key themes and issues arising from the consultation. Particular attention has been paid to ensuring that all issues relating to race equality are fully and properly addressed. For example, concerns were raised that if there were no legal specialist in each hub, the CRE ability to provide a legal service would be adversely affected. As a result it was decided to have a legal specialist in each hub.

11. Policy Application and Monitoring for Adverse Impact

- 11.1 At this time a monitoring strategy is in development. However, the CRE will monitor the recruitment and selection process for the regional hubs and the IAC from applications through to appointments.
- 11.2 Any evidence of adverse or differential impact identified during the recruitment and selection process will be fully investigated and action taken to mitigate or eliminate the impact.
- 11.3 As part of its statutory duty to monitor its policies for adverse impact, the CRE will also invite organisations that were consulted to take part in a series of focus groups to obtain qualitative data on impact of the proposed policy on racial equality.

12. Race Equality Impact Assessment Recommendations

- 12.1 No further assessment of this proposed policy is required. However, this REIA will be signed off by the Legal Directorate before publication.

13. Conclusion

- 13.1 The primary focus of the REIA is to assess if there is any evidence of adverse impact on particular racial groups and whether it amounts to discrimination racial grounds.
- 13.2 No evidence of adverse impact has been identified through the REIA. However, there is potential for adverse impact or differential treatment on certain groups if the CRE is not diligent in way it implements the proposed policy as outlined in paragraph 9.
- 13.3 To alleviate concerns by staff within the affected areas it is advised that particular attention is paid to these staff to ensure that they are fully consulted and briefed about the proposed policy prior to and post implementation.

14. Publication of Race Equality Impact Assessment

- 14.1 The CRE will publish this REIA report and associated documents as set out in its publication policy.

Appendix 1: Initial Screening

Initial Screening Process for the New Strategy for the CRE English Regions

Address each of the questions in turn, they will help to identify whether the policy has implications for equality of opportunity. In each case use your best judgement and, if you think there are some equality implications; provide some brief information on why you think so.

1. What is the purpose of the proposed policy and who is it intended to impact upon?

Please give details

- (i) The proposed policy is intended to maximise the CRE's capacity to promote race equality across the English Regions. This will have a positive impact for all communities, particularly those suffering the most from inequality and discrimination.
- (ii) The creation of nine regional hubs would enable to CRE to maintain better contact with local communities and public authorities including Government Offices and Regional Development Authorities across England. Benefits of this structure are:
 - greater clarity and consistency to the work of regional staff;
 - more capacity to gather intelligence in a focused and systematic way;
 - greater influence over local strategic bodies;
 - an improved ability to monitor for and enforce non compliance of the race equality duty;
 - provision of better intelligence with which to effectively target Section 44 grant aid.
- (iii) The primary recipients of this policy are ethnic minority individuals and others who are afforded protection under the Race Relations Act as amended.
- (iv) The proposed changes may impact on the service currently provided through the existing regional offices. For example, if there is no legal specialist in each hub, what will happen to the customers who would have used this service? Will they be sufficiently served by other local service providers, such as law centres, or the CRE Information and Assistance Centre? These proposals, including the full REIA, need to

be considered alongside the Information and Assistance Centre Strategy and its REIA.

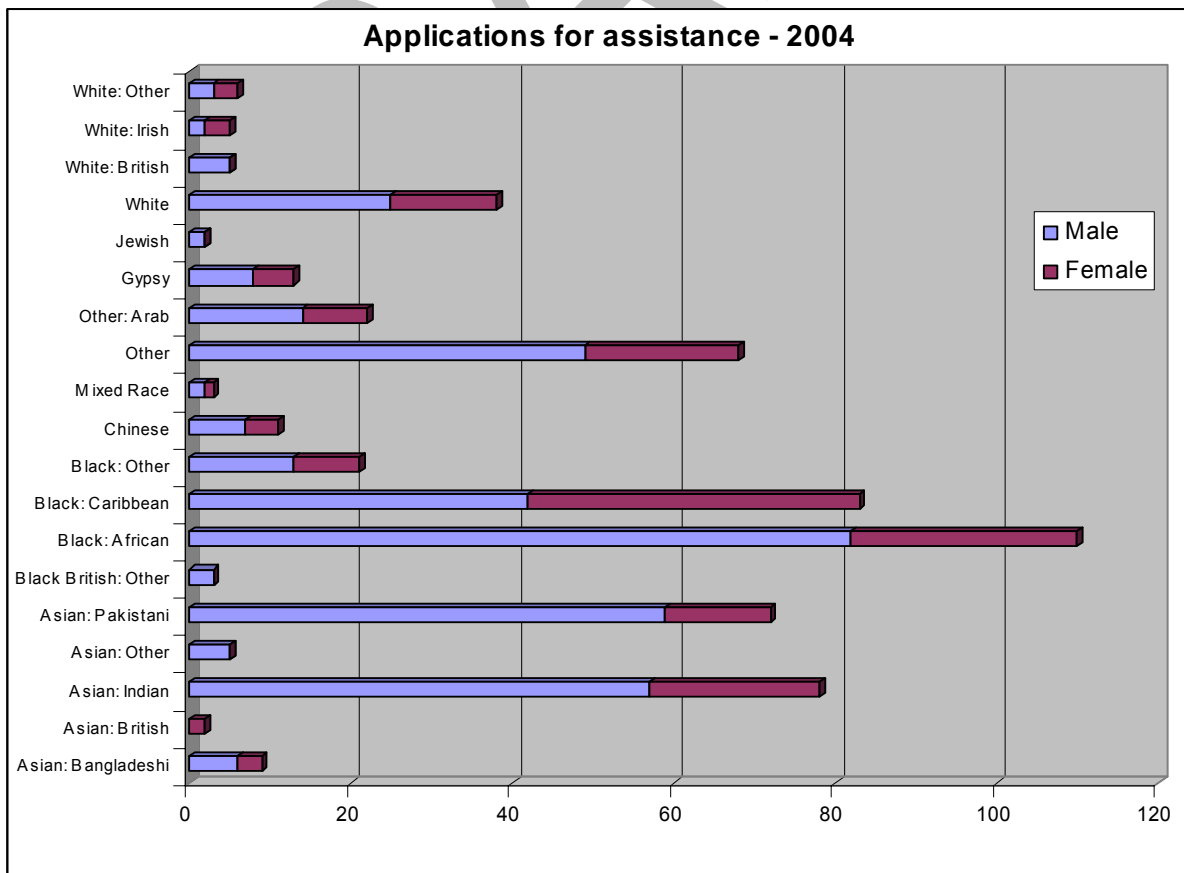
2. Is there any evidence, or other reason to believe, that different groups have different needs, experiences, issues and priorities in relation to this particular policy?

Yes No May possibly be

Please give details

Current demographical data from the census and other sources (including our REIA of Getting Results, which sought regional profiles from regional directors, policy specialists and other organisations) indicates that different communities in different areas have very different needs. For example, research from the Citizens Advice Bureau (2005) suggests that ethnic minorities living in rural areas, especially the South West of England may experience a greater risk falling victim to a racist incident. There is also evidence that such areas are less likely to have insufficient support mechanisms.

- (v) Monitoring data collated from our legal department detailing the ethnicity profile of applicants for assistance also demonstrates differences in need between ethnic groups in relation to race equality.



- (vi) The proposed policy will provide a structure that is better able to identify these needs by creating strategic hubs to coordinate work on the statutory duty at a local level. This structure is core to the development of a strategic approach to oversee delivery of the race equality duty, part of which is to work more effectively with RECs, the voluntary and community sector.
- (vii) Early feedback from some staff in the current regional offices indicates that they have concerns about how this policy [strategy] could affect them. Within reason, every effort will be made to address these concerns and to monitor for adverse impact on grounds of race and the other equality strands.
- (viii) We will balance any assessment identifying the impact on staff against the wider potential benefits for race equality and ethnic minority communities. At this stage, we are not able to identify the staff that may be more affected than others.

3. Is there any evidence, or other reason to believe that different groups could be affected differently by the proposed policy?

Yes No May possibly be

Please give details

- (ix) There is no clear evidence for this, but these proposals will have a significant impact on staff working in the regions and less impact on staff based in London. Therefore, this is a differential impact, which we will monitor and remedial action will be taken to minimise any unjustifiable impact identified. This policy will also offer staff avenues for self-development and promotion.
- (x) Potentially this policy, when taken in conjunction with the new information and advisory centre, will have a positive impact on different groups by allowing the CRE to be more informed of their needs and more accessible generally than is currently the case. For example, potential service users living in Cornwall currently have to travel long distances (up to five hours by train) if they wished to have a face-to-face meeting with CRE staff.
- (xi) Were the CRE to establish nine regional hubs, with one in Bristol, this would make our staff more accessible. In theory, the CRE would also be able to offer more services via the telephone and internet and to a higher standard. This has a range of positive benefits for potential service users at a time when mediums of communication are changing.

4. Is there any evidence to suggest that any part of the proposed policy could discriminate unlawfully, directly or indirectly, against people from some racial groups?

Yes No May possibly be

Please give details

(xii) No, there is no evidence that this policy may or could discriminate in any way. We will wait for the return of consultation responses to identify whether respondees have contrary views about this.

5. Is there an opportunity to promote race equality more effectively by altering this policy or considering working with others in the wider community?

Yes No May possibly be

Please give details

(xiii) This may be a possibility and we will have to see whether alternative suggestions are made during the consultation process. With regard to working with others, this is a central tenet to the strategy, which seeks to build effective local race equality networks in each of the nine Government office areas.

(xiv) At the most basic level this is about capturing what we do best and doing it more widely and with significant influence. The strategy also provides a model to enable to CRE to provide more influence on local authorities to deliver on their race equality duty. This has clear benefits.

6. Have previous policies, research, monitoring data, consultations etc, with relevant groups, organisations or individuals indicated that this particular policy may create problems which are specific to them?

Yes No

Please give details of data (name of policies, research report, etc.)

(xv) We have no data at this time to suggest that this policy will create problems which are specific to certain groups. However we will use the feedback from the consultation process to identify whether there is any adverse or differential impact.

7. Additional Evidence/Information (which does not fall into the above categories)

Please give details

- (xvi) We currently have no additional evidence on this matter. However we aim to collate any relevant information that will enable a full race equality impact assessment of the proposed strategy to occur. This will include an analysis of all submissions to the consultation process and data collated for the race equality impact assessment of the CRE's Getting Results function.

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Appendix 2: Response to consultations

A NEW STRATEGY FOR THE CRE ENGLISH REGIONS

RESPONSE TO CONSULTATIONS

GENERAL

On 10th May 2005 the Commission for Racial Equality embarked upon a major consultation exercise related to a review of the way in which it works across the English regions. The review was based upon proposals contained in the strategy paper, "A New Strategy for The CRE English Regions".

Central to the review was a desire to develop a more effective and devolved regional presence closer to the communities served by the CRE. In conjunction with this, the CRE put forward a further strategy paper proposal to set up an Information and Assistance Centre. This proposed to centralise the CRE's information and advice services to streamline provision whilst widening access to the range of CRE customers. The consultation exercise was undertaken such that it could assist the Commission to further develop its proposals. The consultation would also form part of the race equality impact assessment of the strategy.

In the event, 387 local authorities in England; 82 Racial Equality Councils; 9 Regional Development Agencies; 9 Government Offices; 8 Race Equality Champions; 48 Diversity Forums; SERTUC; the CRE London Board and CRE staff and commissioners were consulted. In addition, a special event was hosted at the CRE Commissioners planning retreat at which the CRE Scotland and Wales Stakeholder Boards, and the British Federation of REC's were also consulted.

Consultation responses were considered fully and a number of the original proposals have since been amended. Race Equality Impact Assessment and risk considerations have been and will continue to be key in the development, implementation and monitoring of the proposals.

There were 60 formal responses received including responses from CRE Trades Unions. A vast majority of the responses were broadly positive.

What follows is an account of Key themes and issues raised by the consultations, and the CRE's formal response.

KEY THEMES

1. Resources

There was some concern that the number of staff proposed for the Information and Assistance Centre (IAC) and Hubs was insufficient for their proposed remit. In addition, there were questions posed as to:

- the number of staff in the London Hub
- the overall cost of setting up the Hubs and IAC
- the grade of staff in Hubs
- management of Hub staff
- lack of legal staff in hubs

CRE Response

Concerns were expressed, mainly from other advice agencies about whether the number of staff in the proposed IAC was sufficient given its wide remit and when compared to the numbers of staff in other NDPBs carrying out similar roles. In response, we have increased the number of IAC staff from 8 to 10 although the workload of these officers will be monitored centrally to ensure resources are adequate.

Whilst we recognise that the proposed remit of the hubs will pose a significant challenge for the proposed number of staff, we believe that it is nonetheless achievable, and that there may have been some misconception as to how the work will be conducted.

Hubs will operate as satellite teams of staff covering geographical areas of a region. They will be expected to work to agreed priorities extracted from the CRE corporate business plan. In effect this means that although the overall remit of the Hubs is challenging, at any given time, hub staff will only be expected to work on aspects of this remit that have been agreed as priorities. This will bring the work undertaken

down to specific, often project based, segments. The outcomes and outputs expected of the hubs will be tailored to the resources available therein.

We believe the proposed Hub Management Structure to be appropriate. Hub staff will be managed regionally. However the work they do will derive directly from the agreed CRE corporate business plan. This in turn will have been prepared with prior direct input from the hubs so as to ensure its relevance to regional work. The corporate business plan will make clear what contribution is expected of the hubs, and hubs will be expected to work to this agenda and contribute to a programme of project work. However, we recognise and accept that flexibility must be built in such as to allow for regional variations and nuances. This will be monitored through work strand forums and pro forma progress updates. We accept that such updates every two weeks may be onerous but the intelligence gathered by Hubs will be crucial in keeping the proposed knowledge management database up to date.

The hubs will also be expected to work in a SMART and strategic manner. This will inevitably mean that there will be less 1-2-1 working than has been perhaps the case in the past but this is in line with the CRE's overall approach to increasing strategic work. It will also mean targeted work through good practice networks, strategic agencies, regional bodies and the like. It will be part of the remit of hubs to assist in setting up such bodies where none currently exist.

As an aid to clarity on the issues concerning staff workloads within hubs, **we propose to formulate a virtual workplan for Hubs** that will be shared with staff. This virtual workplan will seek to give further insight and coherence to the proposed remit, and make expectations in this respect more tangible.

In terms of the CRE Office for London, we propose to reconsider the number of staff once the implications of new central government proposals for race equality work in London are made clear. We believe this to be the most sensible way to proceed given that a potentially major initiative in this respect is to be announced and hope to have achieved this by September.

In terms of the costs of setting up the hubs, we can confirm that the proposals are within budgetary allocations. It is our firm intention that this should remain the case. Costs will, therefore, remain a matter for close scrutiny. The costs of resources

required to implement a new knowledge management technology for the IAC are being scoped and will be quantified in due course.

As stated previously, it is expected that a large part of the work of hubs in delivering on agreed corporate business plan outcomes will be on a project-by-project basis. As such, hub staff will be part of a project team and will report on progress within that team, and will be directed by agreed team activities.

2. Location

The key issue raised under this theme put simply was, do the hubs need to be co-located with other strategic agencies in order to effectively accomplish their remit? Do the advantages of co-location outweigh the disadvantages, and has the rural dimension in hub location been properly taken into account? The location of the proposed IAC was also raised.

CRE Response

We are very aware of the possible disadvantages attendant upon co-locating with other strategic agencies:

- perceived threat to CRE independence
- the implications for current staff employment
- management issues associated with co-location
- the potential threat to the CRE's credibility in some areas
- cost benefit issues

These are some of the potential disadvantages. However, the advantages include:

- greater regional presence, influence and knowledge
- increased visibility
- increased credibility in some areas
- the possibility of joint delivery on shared priorities
- exploration of new delivery models
- possibility of quicker access to strategic policy makers
- enhanced working relationships with REC's and other local Race equality bodies.

As such, we are convinced that the advantages of co-location to some degree outweigh the disadvantages. We are mindful of the need to put in place clear protocols which tackle directly most of the potential disadvantages before embarking upon co-location with any agency. If such protocols cannot be agreed, we will not co-locate.

Partly, as a result of comments raised during the consultation process, we have concluded co-location with RECs would be inappropriate. A number of RECs themselves were of the option that it would be invidious for the CRE to co-locate with one REC rather than another. In addition, the implications for the CRE's funding relationship with the host REC and the perception that co-location may have unduly influenced funding decisions precludes this course of action.

However, representations made to the CRE as part of the consultation process, concerning location of hubs has caused us to reconsider one significant aspect of the location issue. **We now propose that current CRE regional offices in Manchester, Birmingham and London should be maintained as key centres of operation, with satellite offices co-located elsewhere.** This key change to our proposals will mean:

- the possibility that some posts within hubs would become peripatetic with staff located in key centres of operation, but working from a satellite office on an agreed number of days per week
- the possibility of a mix of fully co-located and hot-desking arrangements at different satellite locations
- the maintenance of current technology for video conferencing at key centres of operation with attendant enhanced communications capabilities
- the maintenance of a central base for all satellite hub staff which potentially will assist with management and communication issues.

We have also given detailed consideration to the location of the proposed Information and Assistance Centre (IAC). **As such we are now proposing that the IAC be based in Birmingham.** We have concluded that placing the IAC in the CRE Birmingham office offers excellent space utilization opportunities, and is a highly cost effective way to proceed with its establishment.

In terms of rural issues and location of hubs we acknowledge that this requires further consideration. As such in considering the location of satellite offices, particularly in the S.W we will take account of the rural dimension. However, this will be considered along with issues such as availability of appropriate offices, potential partners, cost, race equality impact and regional needs.

3. CEHR

The key issues raised as part of the consultation process concerning CEHR fall under four headings:

- why proceed with these proposals given that CEHR is coming?
- why not wait until CEHR proposals are finalised?
- why bother with these proposals given the CRE's remaining lifespan?
- the proposals should be coordinated with the other equality commissions

CRE Response

We have considered the issues raised concerning our regional strategy and the impending CEHR and are satisfied that we must act now in the interests of tackling urgent and ongoing race equality issues at regional, local and community levels.

As stated in our strategy document, the CRE has a clear planning horizon between now and its entry into CEHR. We believe we have an important job of work to do between now and then and must get on with it. We have a clear vision as to what we aim to achieve during this period and are determined that we should configure our regional structure and strategy such as to deliver this vision and the outcomes flowing there from.

Having said that, we are mindful that the key thrust of our proposals, and indeed much of the detail, is not inconsistent with proposals contained in the CEHR White Paper. We have liaised with the appropriate organs of central government on our proposals and have not met with any dissatisfaction on our approach. We are also keeping both the Home Office and DTi informed of progress and developments.

In terms of our sister Commissions, we are working with them on the development of CEHR via the central Steering Group. As such, we hope our proposals will inform

any future regional structures brought forward under CEHR. We have consulted directly with both DRC and EOC on our proposals via the CEHR steering group and will continue to liaise with them as appropriate.

As such, we are satisfied that our proposals are timely and that they will make a useful contribution to eventual CEHR proposals for regional work and structure.

4. Specialist and generalist staff

The main thrust of the issues raised under this theme is that regional staff will be de-skilled by the proposal to curtail “specialist” posts in regional hubs, and “generalist” working. There was also the contention that it would be impossible for staff to deliver effectively on the proposed remit of hubs without some “specialist” skills.

CRE Response

We believe there has been some misconception as to the meaning of “generalist” working, and that perhaps the use of the word in this context itself is misleading.

It was never the intention of the strategy review proposals that staff in hubs should in anyway be de-skilled. To the contrary, it is the intention of the CRE to increase the skills of hub staff through training and experiential learning towards making them multi-skilled.

The proposals do not envisage that current “specialist” staff will lose their specialism, but that they will move away from the single focus on specific service/employment sectors that this currently entails. Instead, they will retain and be encouraged to employ their current specialist race equality knowledge, but they will also be required to have a wider focus and be given training in other work strand areas in order to increase their knowledge and strengthen their approach. They will in effect become multi-skilled rather than generalist officers.

As stated previously, much of the work of Hubs will be undertaken on a project-by project basis. Each project may concern a different priority area requiring some new “specialist” knowledge. It is the CRE’s intention that training will be provided for officers to ensure that they will acquire the degree of knowledge and expertise required successfully to achieve the project outcomes and objectives.

A large degree of specialist knowledge is acquired through hands-on work in a job with a particular focus. Hub officers will be given the opportunity to gain such hands-on experience along with the appropriate training. We believe that such experience will stand them in good stead, and potentially enhance their skills profile and marketability.

In terms of legal staff within hubs, we have given detailed consideration to the issues raised as part of the consultation process. As such, we propose a significant change to the original proposals. **We now propose that one legal programmes officer will be based in each of the key centre of operations in Manchester, Birmingham and one in the South of England.** In addition, there will be one Quality Assurance Manager to co-ordinate and oversee the operations of s44 grants to providers of legal casework.

The remit of these regionally based legal staff is likely to include:

- capacity building
- S66 advice work
- quality assurance of funded complainant aid organisations
- good practice networks
- local surgeries on a peripatetic basis

We will also be developing ongoing and in-depth training for IAC staff to ensure that accurate information is collated, stored, managed and disseminated effectively and that staff knowledge skills maintained to a suitably high standard

5. Governance

Issues raised under this theme were in the main about regional oversight of the strategic approach and direction of hubs.

At present the CRE has three Stakeholder bodies for politically decentralised areas of Great Britain. As such, London, Scotland and Wales have stakeholder boards. These boards provide high-level advice to CRE Commissioners on race equality matters in their respective areas, and take forward on their behalf key issues appropriate to their respective administrations. Membership of these boards includes major corporate decision makers in strategic organisations in London, Scotland and Wales.

Some of the observations provided during the consultation process suggest that some kind of regional strategic oversight mechanism, taking the current devolved boards as an example, might provide helpful high-level advice to the work, direction and approach of hubs.

CRE Response

We believe that the suggestion for some kind of region-wide stakeholder input to the strategic approach and direction of hubs has merit. Moreover, we believe that such regional stakeholder involvement in the overall direction and approach of hubs would lend credibility to their work and further enhance local and regional engagement.

We therefore, propose to establish stakeholder partnerships and networks for the North, the Midlands and the South of England.

The stakeholder partnerships will identify region-wide strategic issues that can best be dealt with by regional agencies in concert. They will formulate cross-cutting strategies and approaches that will assist key agencies effectively to tackle such issues.

At a more local level, we propose to establish stakeholder networks. These networks will be established where none currently exist. Where they are in existence we will seek to build on their work. Local stakeholder networks will work towards enhancing local intelligence gathering activity and, identifying and spreading best practice.

We envisage at this stage that membership of the stakeholder partnerships and networks will be drawn from Government Offices, RDAs, local authorities, regional inspectorates, regional chambers of commerce, the police, strategic networks, RECs and community based organisations. Detailed terms of reference will be formulated prior to the establishment of these bodies.

Conclusion

We are of the conviction that our proposals to develop a more effective and devolved regional presence closer to the communities we serve, will enhance and make for more effective work at a local and regional level. We believe that in order effectively to meet our statutory duties we must work with local and regional

stakeholders to tackle racial equality issues as they are experienced within local communities. Our new regional strategy is designed to assist us to deliver on this imperative. As such, our proposals will help us to:

- build better relationships
- engage more effectively
- gather and use intelligence more proactively
- connect more effectively with local communities
- build local networks
- inform national policy with local perspectives
- be an advocate of best practice
- develop influence and transmit the CRE's core race equality messages

Tackling race equality issues and working towards improved race relations is at the heart of these proposals. As such we believe that this consultation process and the changes we have made to our proposals as a consequence will strengthen and enhance the CRE's regional work in pursuit of racial equality.

Implementation of the proposals

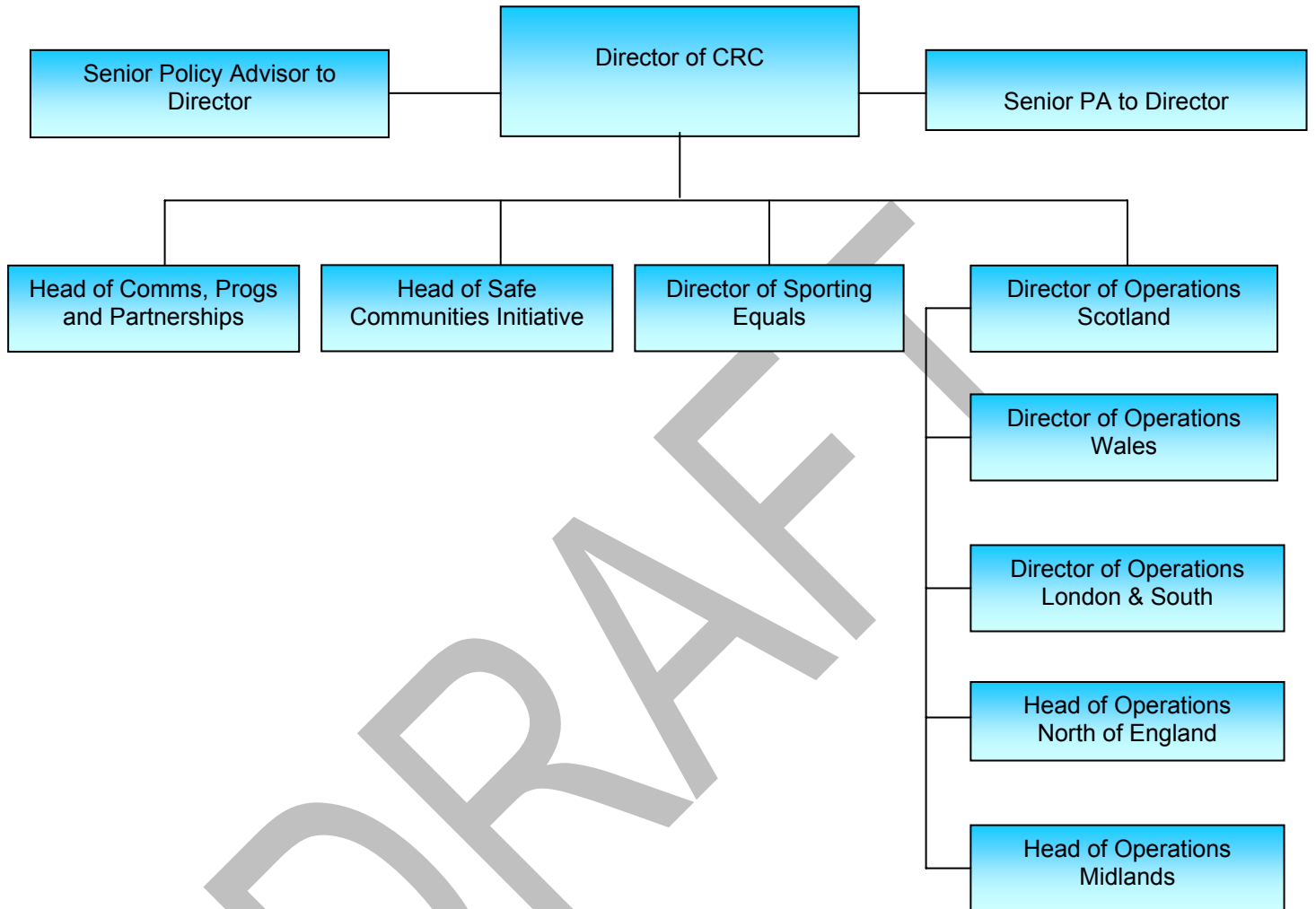
Given that the CRE now intends to retain a corporate presence at existing locations, we will commence the transition to the proposed regional structure across each region with effect from September 2005. Although work will commence on seeking potential hosts for satellite Hubs immediately, if negotiations are not complete by the time staff are in post, staff allocated to satellite Hubs will be expected to undertake their respective roles on a peripatetic basis; from the main regional Hub until suitable arrangements are in place.

As mentioned previously, in order to mitigate potential job losses, employees required to work within satellite hubs may be afforded the opportunity to work from the central hub for part of the week. Such arrangements will be negotiated on a one to one basis.

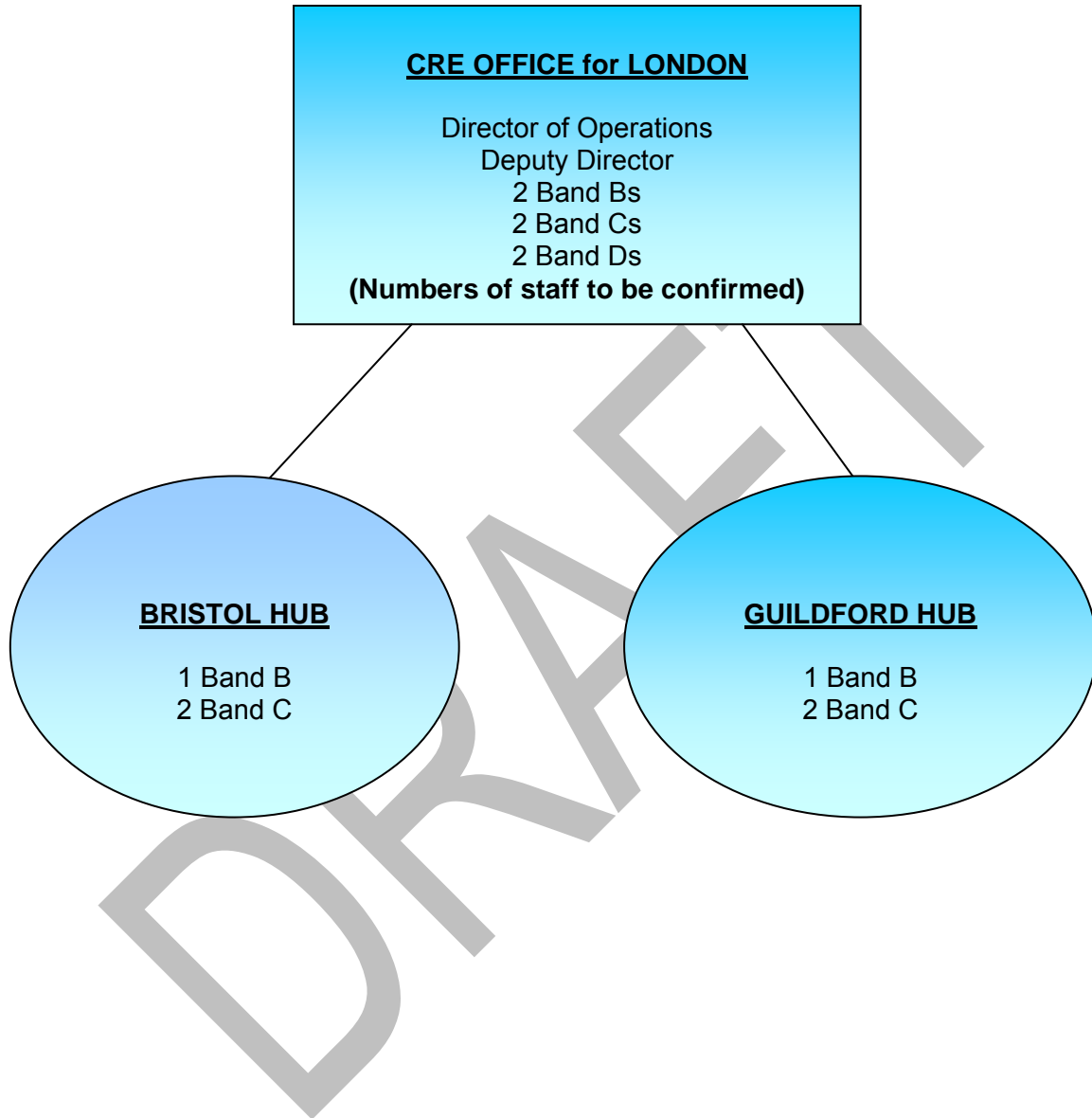
TIMESCALES FOR THE IMPLEMENTATION OF THESE PROPOSALS

Month	Activity
July - August '05	<ul style="list-style-type: none"> • Commence discussions re: co-location proposals. • Draft job descriptions produced and evaluated • Finalise London structure
September '05	<p>Commence recruitment</p> <p><u>5th September – 12th September</u> Advert for A1 posts</p> <p><u>13th September – 19th September</u> Interviews for band A1 posts held</p> <p><u>19th September – 26th September</u> Advert for Band B posts</p>
September '05 to October '05	<p><u>27th September – 7th October</u> Interview for job Band B posts held</p> <p><u>7th October – 17th October</u> Advert for Band C posts</p> <p><u>18th October – 31st October</u> Interviews held</p>
October '05 to November '05	<p><u>31st October – 7th November</u> Advert for Band D posts</p> <p><u>7th November – 14th November</u> Band D recruitment process</p>

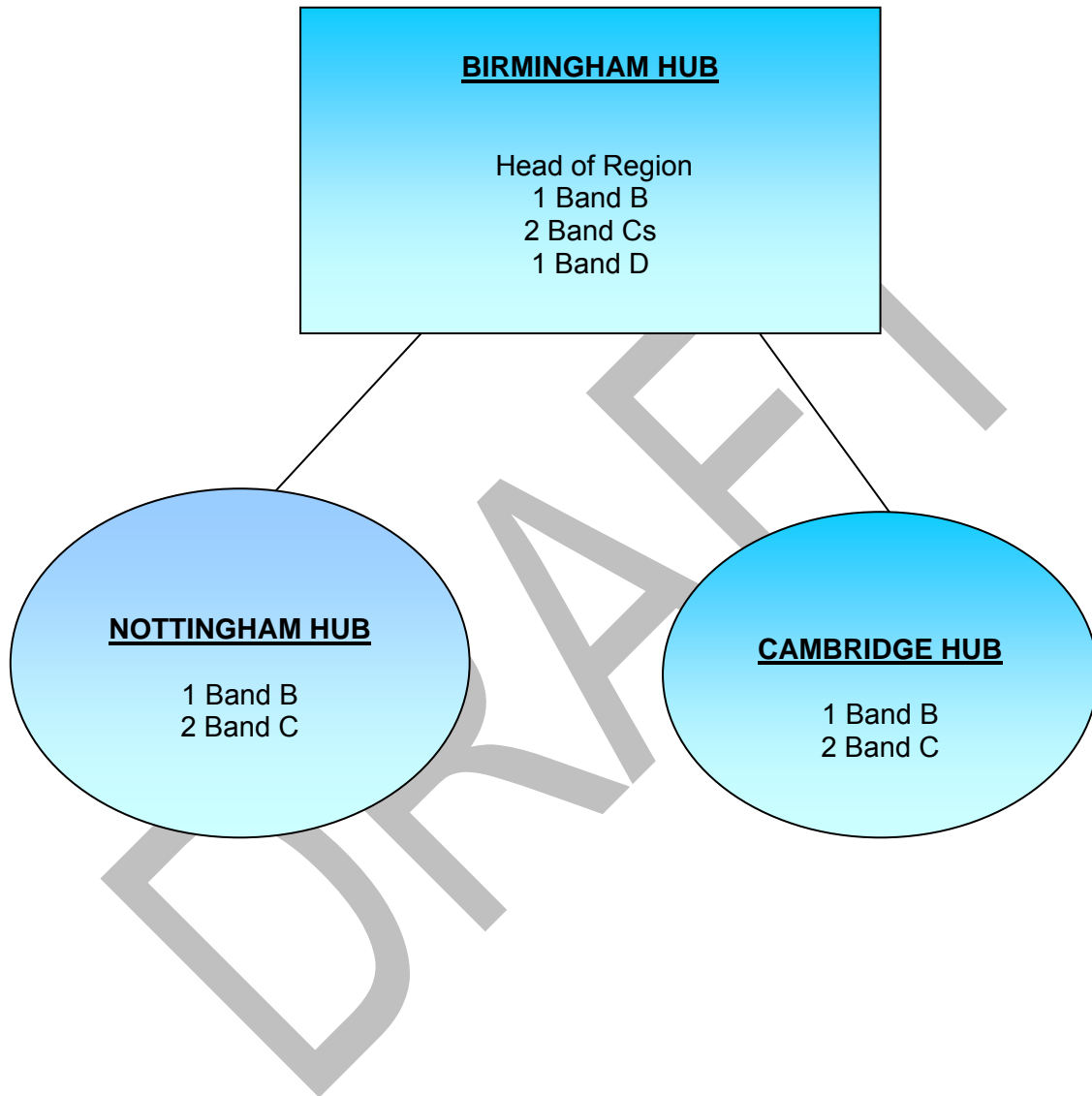
COMMUNITIES COUNTRIES & REGIONS MANAGEMENT STRUCTURE



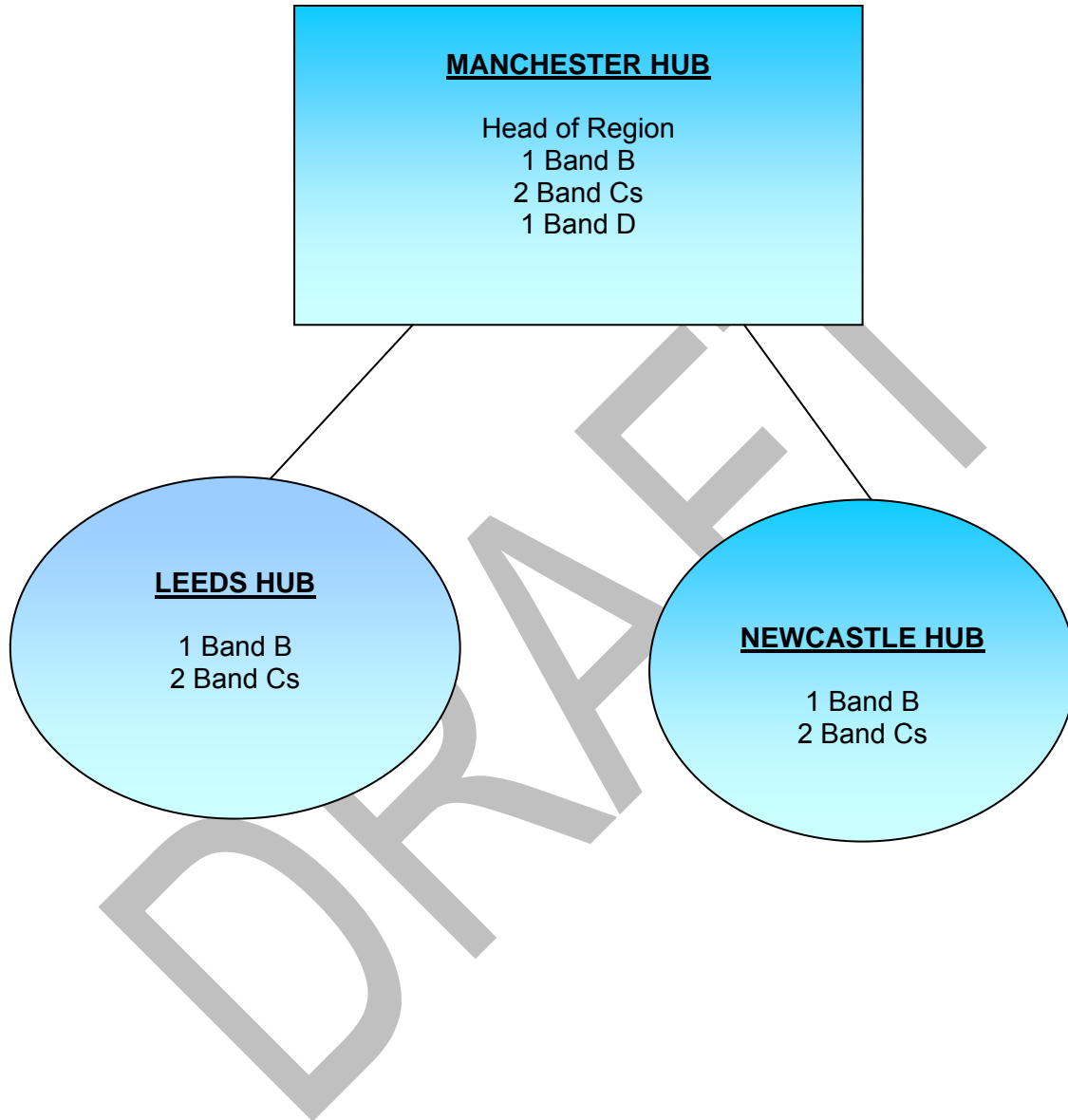
LONDON AND SOUTH



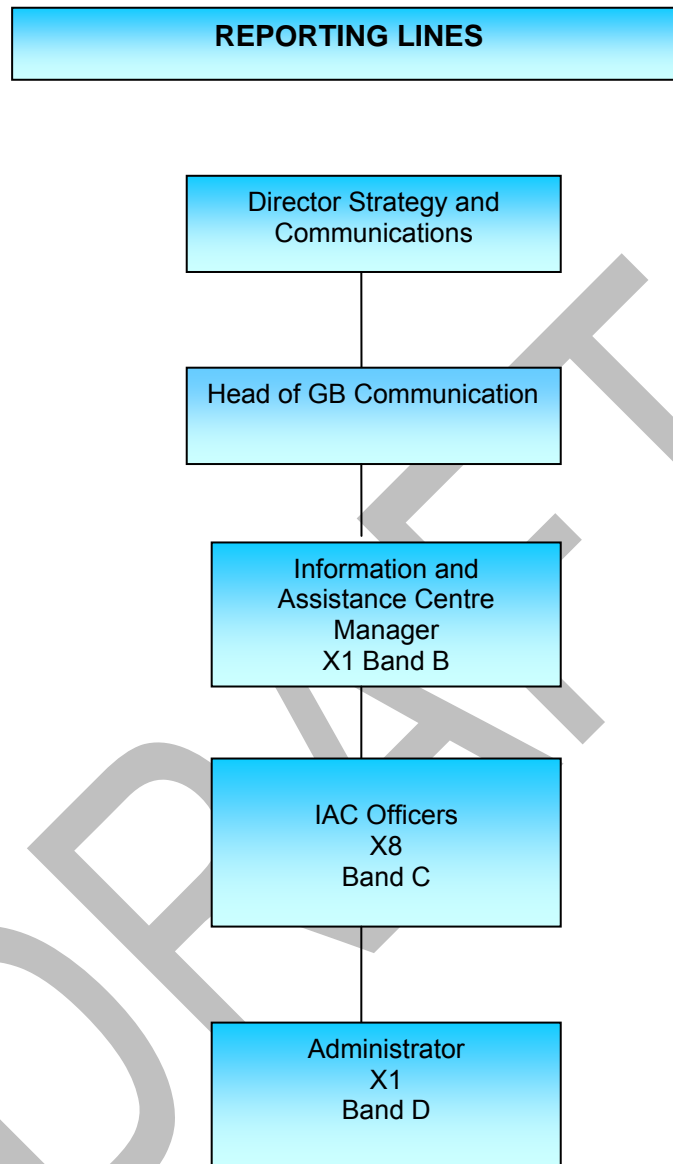
MIDLANDS



THE NORTH



INFORMATION AND ASSISTANCE CENTRE



LEGAL AND ENFORCEMENT SERVICES

