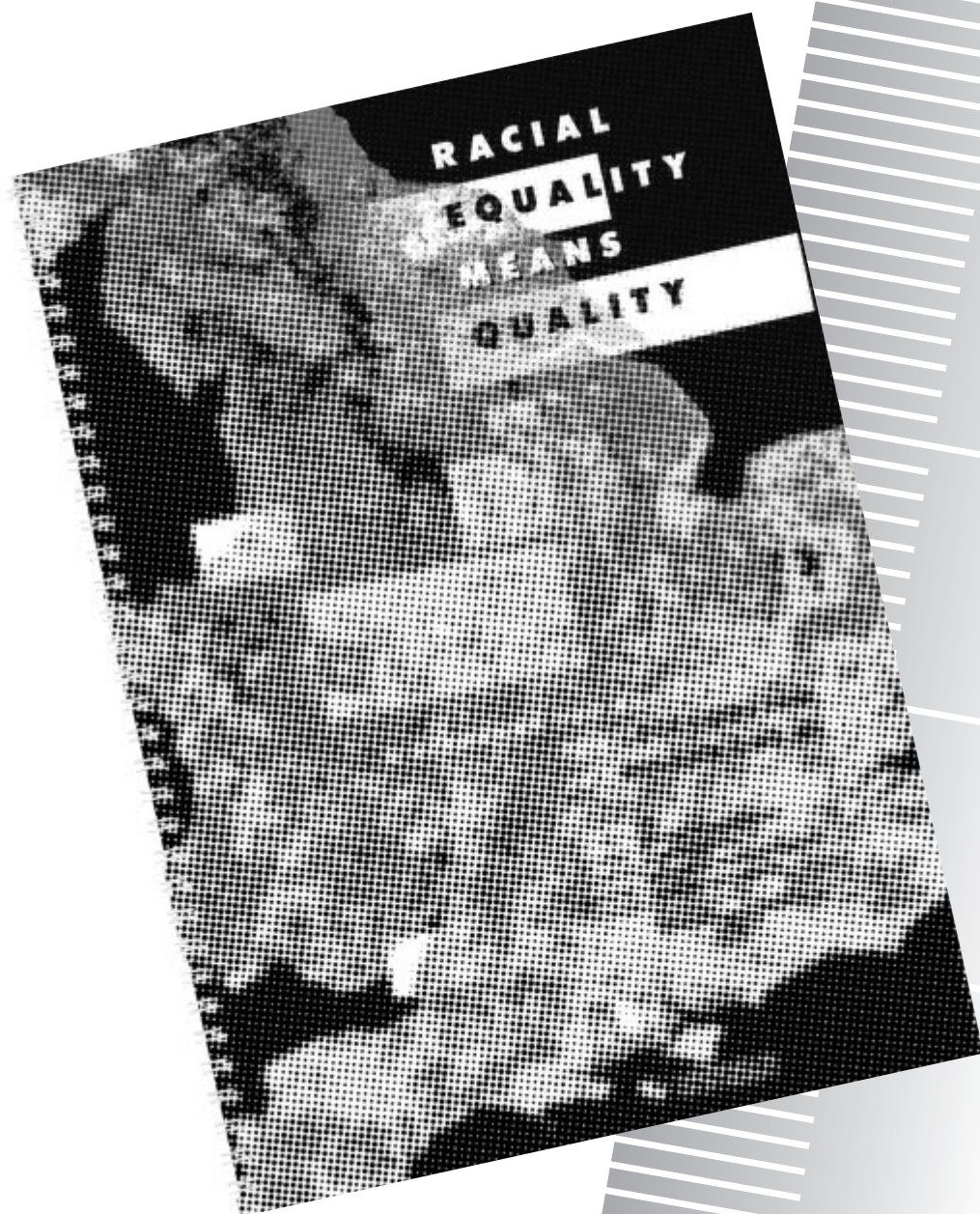


MEASURING UP

Report of a study of the adoption and implementation of
Racial Equality Means Quality, the Commission for Racial Equality's
Standard for Local Government

JULIAN CLARKE AND STUART SPEEDEN

Centre for Local Policy Studies, Edgehill College



COMMISSION FOR
RACIAL EQUALITY



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works in partnership with individuals and organisations

for a fair and just society which values diversity

and gives everyone an equal chance

to work, learn and live free from discrimination,

prejudice and racism.

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CONTENTS

1. INTRODUCTION: DEVELOPMENT OF THE STANDARD	7
The context	7
The Standard	9
Working with the Audit Commission	10
Research themes	11
2. LOCAL AUTHORITIES: ADOPTING THE STANDARD	13
Adoption	13
Implementation	13
Conclusions	19
3. LOCAL AUTHORITIES: MANAGING THE STANDARD	20
Internal structural arrangements for implementing the Standard	20
Performance management systems	21
Monitoring systems	25
Conclusions	26
4. LOCAL AUTHORITIES: USING THE STANDARD	27
The range of difficulties	27
Measurement	29
Conclusions	30
5. CONCLUSIONS AND RECOMMENDATIONS	31
Conclusions	31
Recommendations	37

REFERENCES	38
APPENDIX 1: METHODOLOGY	40
The sample	40
Questionnaire design	41
Who dealt with the questionnaire?	41
Questionnaire returns	42
The case studies	42
APPENDIX 2: THE QUESTIONNAIRE	44

1. INTRODUCTION: DEVELOPMENT OF THE STANDARD

THE CONTEXT

The following report was commissioned by the research department of the Commission for Racial Equality (CRE) and is based on a study carried out in 1998/99. The overall aim of the project was to assess critically the impact of the CRE's racial equality Standard, *Racial Equality Means Quality* (REMQ) (CRE 1995a) on local government. The primary objectives were to:

- establish the level and quality of compliance attained by local authorities
- identify difficulties in implementing the Standard
- make recommendations on how to improve the effectiveness of the Standard.

The Standard, launched in March 1995, was first signalled by the chairman of the CRE, Sir Herman Ouseley, in June 1994, in a public policy lecture linking racial discrimination, 'quality' in local government and the Citizen's Charter programme initiated by the government in 1991. The event marked a clear attempt to shift the emphasis of racial equality work from 'law enforcement', as the principal means of fighting discrimination, towards a model based on quality management. Engaging with 'quality' was, in turn, an attempt to make racial equality a central issue for public sector management in establishing the new performance management structures required under the Citizen's Charter.

The Standard represented a significant opportunity to extend the scope of racial equality work beyond enforcement, by establishing a framework for performance that could be adopted widely by local authorities. This did not necessarily replace the need for statutory enforcement, but it did provide a potential new set of mechanisms for implementing racial equality objectives.

The attraction of quality management lay in the possibility of establishing a culture through which anti-discriminatory policy could be developed and applied. The creation of the Standard represented a universal measure through which local authorities could establish

their achievements in moving towards established performance goals. A system of self-assessment by local authority managers provided the mechanism through which these standards could be applied.

At one level, the Standard is a development of the CRE's work in producing codes of practice for employment and housing (CRE 1984, 1991 and 1992a), in that it seeks to import the codes into the core of large organisations, in this case local authorities. The Standard represents the translation of major aspects of 1980s management theory into a framework which constructs racial equality as an issue of corporate management at the centre of local government (Pfeiffer N. and Coote A, 1992). All levels of an organisation are required to be involved, with major emphasis being placed on high levels of leadership and corporate planning. The Standard serves as a supplement to the CRE's law enforcement; compliance with the law is treated as a quality issue.

Underlying the Standard is the assumption that quality management can be used to ensure that racial equality penetrates all aspects of employment practice and service delivery. Furthermore, by establishing a set of performance measurements, by which a local authority can evaluate its progress against a common Standard, a framework is established through which racial discrimination becomes an issue for all local authorities. This approach is important in a context where racial discrimination is largely seen as an issue for 'inner city' authorities and not for those authorities where the ethnic minority population is very small, and where it is commonplace for officers and councillors to say: *'race isn't an important issue, here'*.

Yet, it is in these communities where discriminatory views and practice continue unchallenged. The absence of ethnic minority figures in positions of authority means that issues of racial equality are rarely voiced or discussed as part of the policy process. The work of Eric Jay for the CRE in the early 1990s (CRE 1992) and, in particular, the much more recent work of the Rural Race Equality Project (NACAB 1999), show that complacency is not just misplaced, but is also a potential source of unlawful discrimination.

THE STANDARD

The Standard document is organised around five areas of assessment of racial equality policy, practice and achievement. These are:

1. Policy and planning
2. Service delivery and customer care
3. Community development
- 4a. Employment recruitment and selection
- 4b. Employment development and retention
5. Marketing and corporate image.

For each area there is a five-level attainment structure, against which local authorities can measure and develop their performance. Level 1 is a basic starting point, with progressive attainment of targets leading eventually to Level 5. Each level in each area contains between two and six action targets. The levels are organised in a hierarchy, so that, for example, to attain level three in any of the areas an authority must have attained *and maintained* its performance at levels one and two in that same area.

Assessment of the overall performance of an authority against the Standard is a complex matter and far from being an exact science. Only one authority in Britain, an authority in London, appears to have completed a racial equality audit in a systematic fashion and reported on the process (LARRIE 11122). The authority was engaged in a year long auditing process and its conclusions about overall attainment were closely argued and well thought out. In contrast, a metropolitan borough council in north west England with a substantial ethnic minority population was, by the end of 1996 only just presenting the Standard to the relevant sub-committee, and by mid-1997 proposing to hold seminars for members and officers on the Standard. A departmental review was scheduled for March 1998. There is no evidence of detailed consideration of the Standard.

Other documentation from the LARRIE database suggests that the London boroughs, together with some Midlands councils, were quickest off the mark. Haringey Council, for example, declared its intention to pilot the Standard in two of its service departments in April 1995, less than three months after the launch of the Standard (LARRIE 09775). Other councils, meanwhile, were still having their attention drawn to the Standard in committee two years later.

The Standard was formally adopted by several equal opportunities and equality sub-committees after 1995. Initial study suggested that, for many local authorities, adoption was a routine procedure; for example, some (mainly London boroughs) adopted the Standard within six months of its launch and drew up plans for departmental pilot audits before the end of 1995. Other councils were still considering adoption in late 1996 and into 1997, and were using the Standard as a simple checklist, apparently without any detailed consideration of what the Standard meant or how it should be used.

The Standard, published in 1995, was sent out to local authorities during 1995/96. To introduce it, a series of regional seminars were organised, and regional offices subsequently charged with responsibility for encouraging take-up by local authorities.

In 1998, the CRE conducted a survey to determine levels of adoption and compliance (CRE 1998). A national one-day seminar, attended by representatives from more than 30 local authorities, was held in September 1998. A substantial guide to using the Standard for racial equality auditing – *Auditing for Equality* – was produced in 1999, to help local authorities with self-assessment against the equalities performance indicators newly introduced by the Audit Commission (CRE 1999).

WORKING WITH THE AUDIT COMMISSION*

In pursuit of the performance review and Total Quality Management (TQM) approach to racial equality, the CRE has negotiated the inclusion of racial equality performance indicators in the Audit Commission's set of Statutory Performance Indicators, developed over the period 1994/95 – 1997/98. The Publication of Information Direction 1996 contained the following equalities indicators:

- 6a – Does the authority have a comprehensive published policy to provide services fairly to all sections of the community?
- 6b – Does the authority formally monitor how it carries out its policy?
- A6c – Does the authority follow the Commission for Racial Equality and the Equal Opportunities Commission codes of practice on employment?
- A6c(i) – Does the authority formally monitor its staff in terms of gender and race across at least two staff grades or salary bands?
- B4 – Does the authority follow the Commission for Racial Equality code of practice in rented housing? (excludes employment section) (Audit Commission 1996a)

* The equivalent body for Scotland is the Accounts Commission, which had not in 1999 developed performance indicators (see below, p 13).

The following indicator was included in *The Publication of Information Direction 1997*:

- A7 – Which level of the Commission for Racial Equality’s ‘Standard for Local Government’ does the authority conform to in the provision of services to the community? (Audit Commission 1997a)

All authorities in England and Wales have therefore to have considered both a range of equalities indicators and the issue of assessing themselves against the Standard when they reply to the Audit Commission. The inclusion of A7 brings the Standard into the mainstream of local government auditing, and gives it an albeit limited statutory role missing under the Race Relations Act 1976¹.

RESEARCH THEMES

The overall aims for the Standard represented a broadening of the compass of the CRE's racial equality work, taking it beyond employment into service delivery; beyond the ‘inner city’ to areas where the ethnic minority population is very small; and beyond ‘legal enforcement’ into the culture of ‘new public management’. These broad aims, implicit within the Standard, served as the context and purpose of this report; namely to examine the extent to which the Standard has fulfilled them. The key themes of the report are:

- the extent of adoption of the Standard by local authorities
- implementation of the Standard and the level of compliance
- the capacity of local authorities to manage equality as a quality issue
- problems experienced with the structure of the Standard.

The research was organised around two approaches: the development and analysis of a postal questionnaire (see Appendix 2, p 46); and case studies of a small number of authorities based on detailed interviews with staff. We had aimed to get responses from a minimum of fifty authorities, taking into account the following:

- geographical spread across all regions (England, Wales and Scotland)
- concentration of the ethnic minority population

¹ In *The Publication of Information Direction 1998* these indicators have become A3a A3b, A3c(i), A3c(ii) and the Standard indicator A4. The housing code of practice indicator has remained as B4.

- unitary and non-unitary authority status
- metropolitan and non-metropolitan authority status

The questionnaire was eventually completed by 54 local authorities, providing quantitative data on the levels of take-up and compliance. It also provided a large amount of qualitative data to support the quantitative analysis. The data assembled from both the questionnaire survey and the case study interviews were used for analysis around the key themes. Further details of the methodology are contained in Appendix 1 (p 42).

The final chapter sets out our conclusions on the quality approach to racial equality, and our recommendations on how to proceed with this approach.

2. LOCAL AUTHORITIES: ADOPTING THE STANDARD

ADOPTION

A primary aim of the research was to establish the extent to which local authorities had adopted and engaged with the Standard. The overall adoption rate among our respondents was 57 per cent. As might be expected, London boroughs had the highest level of adoption, and district councils the lowest, although even here the level was 38 per cent. The CRE's 1998 survey (CRE 1998), containing responses from more district councils, returned an adoption rate of 33 per cent. A relatively high adoption rate in Scotland may have been due to strong encouragement by CRE Scotland and COSLA (our sample figures match figures collected by CRE Scotland). Table 1 sets out the results for adoption.

Table 1: Adoption of the Standard

Category of local authority	Have you adopted the Standard as a basis for assessing performance on race equality?	
	No.	%
All	30	57
Counties	4	67
Districts	6	38
London	6	86
Metropolitan	5	56
Scotland	6	60
Unitary	3	50

Note: All tables record 'yes' answers to questions

IMPLEMENTATION

Adoption of the Standard does not mean local authorities have begun implementing it. Table 2 shows the levels of progress made by the authorities in our sample.

Altogether, 14 (26 per cent) responding authorities said they had conducted an evaluation using the Audit Commission's indicator A7, compared with 23 per cent in the CRE's 1998 survey. A further 14

said they had begun an evaluation. This increase would suggest that the introduction of the Audit Commission's Performance Indicator (PI) provided local authorities with an impetus to embark on the auditing process, even though the impact of the PI appears to have been concentrated on those authorities that had already adopted the Standard. In conclusion, the PI has not, so far, had a marked impact on the number of local authorities adopting the Standard.

Table 2: Progress in implementing the Standard

Category of local authority	Has the authority evaluated itself against the Audit Commission's PIs?		Have you begun an evaluation?		Have there been difficulties with self-assessment or Audit Commission's PIs?	
	No	%	No	%	No	%
	All	14	26	14	26	16
Counties	1	17	2	33	2	33
Districts	5	31	4	25	5	31
London	4	57	2	29	4	57
Metropolitan	1	11	2	22	3	33
Scotland	n/a	n/a	n/a	n/a	n/a	n/a
Unitary	2	33	1	17	2	33

Note: All tables record 'yes' answers to questions

The qualitative material from the questionnaires and the case studies shows that there are varying interpretations of what constitutes an audit against the Standard. In one London borough, an elaborate, year long process was used to identify and verify performance against the measures in the Standard. In some authorities, while service managers or departmental directors appear to have undertaken self-assessment exercises, the evidence supplied in support of their conclusions was very variable. In other cases, an officer responsible for racial equality conducted the audit through consultations with service departments. It should be noted, too, that a number of London boroughs had made a conscious decision to pursue pre-existing racial equality initiatives and largely ignore the Standard.

Such differences in approach demonstrate varied commitment to the Standard among the authorities that have undertaken an audit. Some saw the Standard as central to the development of racial equality work in their authority, while others complied, but were involved in other racial equality strategies at the time of the survey. The following comments from respondents illustrate the different ways in which evaluation/auditing has been approached.

The situation in Scotland was different from that in England and Wales, since the Accounts Commission, the Scottish equivalent of the

'We have developed our own "Achievement Indicators" for each criterion of the RE Standard.'

'Following adoption of the CRE Standard as a useful measurement tool ... the council audited its services. This was complicated by lack of specialist staff. Some of the officers were more "generous" to the council than I would have been.'

'In general terms, I am concerned that the Standard for Race Equality reflects a centralising and somewhat old-fashioned management style which does not equate to the management practice which we in [this authority] seek to aspire. Nor does it seem appropriate to a borough where the majority of residents are from black and minority ethnic communities.'

'... we have developed our own standard (albeit based on the CRE approach), which embraces all groups.'

Audit Commission, has not developed racial equality performance indicators. This reflects a view within the Accounts Commission that the Standard, in its present form, cannot be effectively translated into performance indicators. However, three Scottish authorities in our sample had attempted some kind of self-assessment in relation to the Standard. The difference in the approaches of the two inspecting bodies presents a problem in driving the use of the Standard.

The qualitative responses in England and Wales revealed quite a high level of reporting of difficulties with the Audit Commission Performance Indicator A7. The difficulties reported are at their highest level among the metropolitan boroughs. These are the authorities that have, in general, gone furthest in attempting to develop good racial equality practice. The main difficulty seemed to relate to the different levels of achievement in different service areas.

Other authorities may experience the difficulty identified in these comments as they proceed with the Audit Commission's performance indicator A7 (now A4). (Scottish authorities were not asked to

'Area by area approach in place before PI introduced. Unclear as to how an overall level for the council can be determined ...'

'The main problem has been in converting the evaluation of the Equalities Action Planning Process into the Audit Commission PIs.'

'Unclear as to how an overall level for the council can be determined if different departments are at different levels in different areas.'

respond to questions relating to the Standard indicator because, as noted above, the Accounts Commission in Scotland does not use any equalities performance indicators.)

The dilemma over different levels of activity within authorities was underlined by local authority assessments of their level against the Standard. Responses for whole authority activity ranged from Level 1 to Level 3, whereas, in some authorities, some services were at Level 4. However, the validity of some of these assessments may be questionable, as audit processes vary in quality. The qualitative responses given by the authorities in the questionnaires and the case study interviews revealed that very few had carried out a thorough audit, demonstrating difficulties with both consistency of interpretation and adequate verification systems.

Typically, an audit was conducted by requesting service heads to assess themselves against measures in the Standard. Concerns were expressed through the case study interviews and the qualitative responses from the questionnaire that service managers tended to overestimate the level reached in their area. Most audits did not seem to have required the presentation of evidence in support of such claims. While the approach to auditing was demonstrably more rigorous in some London boroughs, even these authorities appear to have had difficulty in reaching Level 3 across all activities.

In the CRE's own survey, the figures produced for the levels reached against the Standard were for those authorities that had conducted an audit. The variable quality of audit procedures indicated by our study suggests that it would not be meaningful to make comparisons between local authorities based on the levels they claimed to have achieved.

The lowest level of activity among English and Welsh authorities was found among metropolitan authorities outside London. The qualitative data indicated that a number of them already had established racial equality practice. They tended to see the Standard as an interesting development, while continuing with their own previously developed techniques and initiatives. Some interviewees from these authorities made it clear that they felt that the ownership of the Standard rested in London.

County councils had higher adoption rates than non-metropolitan district councils. This was probably because responsibility for education and social service delivery lies with counties, not districts. The qualitative evidence showed that racial equality initiatives in rural county councils with low ethnic minority populations had come from the education and social services departments. Although adoption of the Standard was lowest among non-metropolitan district councils, the qualitative data suggested that there were actually two different

attitudes to racial equality work here: there were those districts that saw racial equality work as irrelevant, and those that would have liked to make a greater effort, but had neither the expertise nor the resources.

As a means of verifying progress by local authorities in meeting the Audit Commission's Performance Indicator, authorities were asked whether they had a comprehensive, published equal opportunities policy. As Table 3 shows, 70 per cent of authorities had policies. London and metropolitan boroughs scored higher than other authorities, but all categories showed over 50 per cent. The responses to our survey correspond closely with figures from the Audit Commission, which are shown in Table 4.

Table 3: Comprehensive equal opportunities policies and racial equality statements

Category of local authority	Does the authority have a comprehensive, published equal opportunities policy?		Does the authority have a racial equality policy statement?	
	No.	%	No.	%
All	37	70	17	32
Counties	4	67	2	33
Districts	10	63	5	31
London	7	100	3	43
Metropolitan	7	78	4	44
Scotland	6	60	2	20
Unitary	3	50	1	17

Note: All tables record 'yes' answers to questions

Table 4: Authorities with equal opportunities policies

Year	No. of authorities	EO policy	% EO policy
1994/5	365	194	53
1995/6	364	226	62
1996/7	392	275	70

Source: Audit Commission

Note: All tables record 'yes' answers to questions

The responses to this question, however, need to be treated with caution. The qualitative research suggested that authorities may not have understood clearly the meaning of 'comprehensive, published equal opportunities policy', as set out in the Audit Commission

Guidelines for 1998/99, and that they had responded to an earlier performance indicator (for the period 1995/96) asking whether the 'authority has a published policy to provide services fairly to all sections of the community'.

A comprehensive policy is one which specifies as a minimum:

- a commitment by an authority to deliver services fairly to all sections of the community
- what types of action the authority intends to take, or has taken, to identify groups whose needs are less well met by council services than those of other groups; for example monitoring of service usage and audits of provision
- which subcommittees are responsible for taking action to respond to identified need and are responsible for monitoring the effectiveness of action
- how the effectiveness of such action is monitored: target setting, user surveys (identifying non-users), local performance indicators
- if not covered above already, what types of action the authority will take to ensure compliance with the three major pieces of equality legislation
- the responsibilities of staff in relation to implementation of the policy.

(Audit Commission 1997a)

The evidence from the case studies supports the view that many authorities, especially at district level, might have interpreted the phrase 'comprehensive equal opportunities policy' very broadly, and responded positively if they had an equal opportunities policy of any description. The fact that less than one third of all authorities said they had a racial equality policy statement supports this view.

Table 5 compares local authority responses on their comprehensive equal opportunities policy and compares these with their responses to the question: 'Is monitoring used to improve the quality of service?'. Clearly, fewer authorities, across all categories, said they had monitoring procedures. Since monitoring is part of a comprehensive equal opportunities policy, as defined by the Audit Commission, this cast further doubt on local authorities' claims to have an equal opportunities policy that met the criteria. The discrepancy between these results was negligible for metropolitan authorities and county councils, but it was significant in non-metropolitan district councils, where only 25 per cent reported having monitoring procedures.

The involvement of the Audit Commission may provide a basis for greater consistency in interpretation of the Standard, but Audit Commission guidelines for district auditors will need to be able to distinguish between different forms of policy, if compliance is to be achieved. Two of our interviewees questioned whether district auditors would have the necessary time and/or skills to verify compliance in these areas.

Table 5: Comprehensive equal opportunities policies and monitoring procedures

Category of local authority	Does the authority have a comprehensive, published equal opportunities policy?		Is monitoring used to improve the quality of service?	
	No.	%	No.	%
All	37	70	28	53
Counties	4	67	3	50
Districts	10	63	4	25
London	7	100	6	86
Metropolitan	7	78	5	56
Scotland	6	60	6	60
Unitary	3	50	4	67

Note: All tables record 'yes' answers to questions

CONCLUSIONS

The quantitative picture of adoption and implementation provided here provides an important insight into the way in which the Standard has been received by local authorities. As a comparative measure between local authorities, the Standard leaves considerable scope for local interpretation. While, however, many non-metropolitan district councils had an equal opportunities policy, very few of them had a comprehensive policy, as defined by the Audit Commission. The next chapter goes on to examine some of the quantitative findings on the management of the Standard, but its principal focus is on the qualitative material obtained from the questionnaire and the case studies.

3. LOCAL AUTHORITIES: MANAGING THE STANDARD

To understand the ways in which local authorities have managed the Standard and incorporated it within their structures, the study collected qualitative data through the questionnaires and through extended interviews with key officers in the case study authorities. The survey has produced a wide range of diverse material on management structures that can inform the future development of the Standard. The main issues arising from the qualitative analysis fall into the following categories:

- internal structural arrangements for implementing the standard
- performance management systems
- monitoring systems.

INTERNAL STRUCTURAL ARRANGEMENTS FOR IMPLEMENTING THE STANDARD

Thirty-seven respondents to the questionnaire said they had provided information about the Standard within their organisation. Thirty of these were authorities that had adopted the Standard. In most cases, information had been distributed through the committee structure. In some cases, there had been more extensive communication of the Standard to equalities officers or to service heads. However, levels of information provision were highest in those authorities that had begun or completed an audit process. Typical responses from an authority that has carried out an audit are recorded below.

'30 copies of the booklet (REMQ) have been purchased and distributed to key officers and members of the Corporate Equality Group.'

'It was summarised in the Committee report.'

'It is an item on the Corporate Equality Group agenda at regular intervals.'

'An away-day of the CEG focused half a day on the topic to discuss detailed directors' comments.'

'Key officers are regularly up-dated.'

It is clear from the answers that the adoption of the Standard does not mean that it will be widely disseminated or communicated within the council and among service users. This was evident in the case study interviews. Only in those authorities where there was already a high commitment to racial equality work would there be widespread communication of the Standard within the authority, backed by training. In Scotland, the modes of communication were largely through committee systems and followed similar patterns to England and Wales.

Generally, responsibility for implementing the Standard in metropolitan authorities lies with an equalities committee or sub-committee, which reports to the main policy committee. There are wide variations in detailed structure and some authorities (three in the sample) explicitly link equalities and performance in their committee structure. In county councils, responsibility lies with either equalities sub-committees or policy committees. One county cited its Personnel Resources Committee.

In district authorities, responsibility for implementation tends to rest with the main policy committees or, in a number of cases (four in the sample), with the personnel committee. This demonstrates a continuing perception within authorities that equal opportunities is primarily an employment issue. Scottish authorities, overall, seem to have equalities sub-committees, with a small number citing the policy committee as being responsible.

Among authorities that had adopted the Standard, around 50 per cent had committees with an equalities brief, suggesting a high priority for equalities policy. However, the case study interviews tend to suggest that, even where there is a sub-committee responsible for equal opportunities, this does not necessarily give the Standard a strong profile within the authority, and the key to implementing the Standard lies in the management and performance systems within the authority.

PERFORMANCE MANAGEMENT SYSTEMS

Among the metropolitan authorities, most of the respondents had adopted performance management, including equalities indicators. Only two metropolitan authorities had no system in place. Most of the systems involved some form of equalities action plans for services and five authorities were clearly using the CRE Standard as the basis for their review. In most of the authorities, the review system appeared to be independent of a corporate performance review process. The most comprehensive linkage between performance review and the Standard occurred in three of the London authorities where racial equality was part of their corporate strategy.

Most of the counties and unitary councils had some system of performance management, but only two incorporated equalities indicators as part of the system.

'Implementing recommendations leading to achieving level 2 is part of the Council's corporate equal opportunities action plan, which is monitored regularly by the corporate equality group and lead members.'

'Targets for equality are built into service plans. Some issues taken forward are specifically equality focused and include quality. Information shared with and feedback welcomed from ethnic minority community.'

In the district authorities that were surveyed, fewer authorities had performance systems in place. Eight authorities had no performance management system in place. The other authorities had varying levels of performance monitoring, but only four reported having performance measures on race: one had a range of equalities performance indicators; two used the Audit Commission Performance Indicator; and one had employment based indicators.

Among district authorities, there is little evidence of a management culture around performance which would be capable of driving progress through the Standard. In these authorities, the use of the Standard as a quality development tool is poorly developed. In the counties, unitaries and metropolitan councils, performance management

'The council has a performance monitoring system which includes a customer comments scheme ... There are no performance criteria specifically relating to race equality.'

'There are statutory performance indicators which we answer as best we can.'

appears more advanced, but the systems are fragmented. Only three authorities had comprehensive performance management systems which 'mainstreamed' racial equality as part of a corporate approach. Mostly, the systems were separate equality performance systems, managed through action plans. Eight authorities from the survey were using the Standard as the basis for performance management, while a further four used the Audit Commission Performance Indicator.

CASE STUDY: PERFORMANCE MANAGEMENT

Problems encountered in the implementation of the Standard

- The strategic unit seems to have been optimistic in its targets for achieving level 3 of the Standard and this may reflect a lack of consultation with departments over the targets or it may represent an underestimation of the requirements of level 3.
- The experience of departments in meeting corporate objectives does not seem to be effectively represented and fed back into the corporate planning system.
- There is insufficient understanding of monitoring as distinct from data collection.
- Inadequate thought has been given to monitoring needs and the support of monitoring through information technologies.
- There is little evidence of departmental objectives for equal opportunities which turn corporate objectives into service objectives.
- There is little evidence of departments generating their own equal opportunities objectives.
- The introduction of the Business Excellence Model could provide a useful framework for developing equality issues, but departments and service heads will require advice on how to achieve this.
- The equalities officers can play a useful role within the departments but in some areas they may be marginal to the policy process.
- The equalities officers do not meet as a group or network to discuss common problems or share good practice.
- The absence of a corporate resource around equalities has meant that the development of mainstreaming has been insufficiently supported.
- The decision to drop level 3 as a key task in 1997/98 on the grounds that this activity would now be mainstreamed seems to have led to a downgrading of commitment in service areas.
- Resistance to the development of measures within the Standard comes in a number of forms.
 - resistance associated with the view that equalities isn't an issue in a particular activity without critical examination and review
 - resistance associated with the view that service users would resist or resent monitoring
 - resistance associated with the view that the monitoring system we have is what we can afford
 - resistance associated with the view that 'we have good professional practice with regards to equality' and have nothing to learn from the CRE Standard.

In Scottish authorities, the introduction of performance management was recent or still under development. Limited work, therefore, had been done on performance management of equalities practice.

Performance management around equalities is most developed in the metropolitan districts. Through the case study interviews, a number of the authorities using performance management were examined, to assess their effectiveness in driving the Standard. Three factors were identified as being important in the performance management process:

- political/managerial commitment to racial equality as a strategic/corporate objective
- target setting across all service departments for achieving progress against the Standard
- effective monitoring procedures.

Even where authorities had established these elements of performance management, there were a range of institutional factors that continued to act as barriers to the implementation of the Standard. The difficulties encountered in performance management were illustrated in a case study of one of the metropolitan authorities, which had a strong commitment to racial equality and had put in place a comprehensive system of performance management incorporating the Business Excellence Model.

The evidence from a number of local authorities suggests that, while systems for performance management might have been established, the management culture of these authorities was, as yet, insufficiently developed to ensure the effective development of the Standard.

There was strong evidence to show that the Standard was inconsistently applied within local authorities and that there was both inter- and intra-departmental variation in the Standard levels that had been attained. Equalities performance management was also applied unevenly within authorities. The case study interviews showed that personal services, such as social services, youth services, education and housing, and personnel management were more rigorous in their application of performance systems for equality than environmental services, such as refuse collection, or corporate services, such as finance. A number of authorities indicated that the Standard had only been applied to employment and not to service delivery at all.

Local authorities need more advice on how to incorporate the Standard into performance management, and, in particular, in Best Value reviews.

MONITORING SYSTEMS

Thirty-one of the responding local authorities said they had a monitoring system in place. Almost all the authorities referred to an annual or biennial 'monitoring' of equality or service plans. Only eight authorities referred to specific monitoring of equality indicators.

The absence of evidence of detailed monitoring procedures from the questionnaire responses suggests that monitoring in most authorities is not supported by the detailed use of a range of performance indicators. Moreover, most local authorities have a limited understanding of the level of monitoring which would be required to deliver the Standard at level 3. This position was underlined through the case study interviews, where, even among those authorities that had identified equalities performance indicators, there was a tendency to confuse 'data collection' with monitoring. Monitoring as defined

'The council conducts regular equalities reviews of services and has agreed to include equalities in all Best Value reviews. One aspect of this is in relation to race equality.'

"Service provision is monitored by ethnicity in a number of areas, for example social services clients; housing repairs; grants; allocations; waiting lists; advice clients; education – pupil achievement; youth business advisory service. Monitoring information used to ensure fair access to services and to inform policies to address any apparent inequality.'

within the Standard requires that data, collected around a performance indicator, should be used to reflect on performance, targets and policy.

The most common form of monitoring taking place in local authorities concerned employment, but the case studies suggest that data on the ethnic background of applicants and interviewees are collected, but not used effectively in monitoring recruitment policy and practice.

Local authorities need more advice, support and training in the development of equality indicators and monitoring systems.

'Yes, we collect the data, but, frankly, we don't know how to use it. It goes to committee as a formality but it usually passes without comment.'

CONCLUSIONS

Our study shows major differences in the internal arrangements for the implementation of the Standard. The differences related to the level of commitment of both councillors and officers to racial equality as a strategic and/or corporate objective; and to the way targets were set across service departments for achieving progress against the Standard. In addition, the absence of effective monitoring procedures, particularly in key areas of service delivery, meant that, even if targets had been set, it was difficult to know to what extent they had been met.

4. LOCAL AUTHORITIES: USING THE STANDARD

THE RANGE OF DIFFICULTIES

Twenty-six local authorities in the survey reported difficulties in using the Standard. They were asked to identify these from the four categories listed below:

- Layout and organisation
- Language and terminology
- Difficulty in interpreting the levels
- Criteria associated with the levels

The level of reporting within each category is shown in Table 6.

Table 6: Difficulties experienced with the use of the Standard

Category of local authority	TYPE OF DIFFICULTY									
	Any		layout & organisation		language & terminology		Interpreting levels		Criteria within levels	
	No.	%	No.	%	No.	%	No.	%	No.	%
All	26	49	6	11	10	19	17	32	18	34
Counties	1	17	0	0	0	0	1	17	1	17
Districts	7	44	0	0	1	6	4	25	5	31
London	5	71	1	14	3	43	2	29	1	14
Metropolitan	7	78	3	33	3	33	4	44	6	67
Scotland	4	40	0	0	1	10	4	40	3	30
Unitary	2	33	2	33	2	33	2	33	2	33

Note: All tables record 'yes' answers to questions

As the table shows, the main areas of difficulty are associated with the interpretation and application of levels and criteria within levels. Some difficulty was experienced with the organisation and layout of the document. The main concerns were its length and repetitiveness. Overall, there was a concern that the Standard was not very accessible or user-friendly and that it lacked sufficient guidance on how it should be used.

The inaccessibility of the Standard was, in part, attributable to layout, but a greater problem seemed to be the use of language, which may be unfamiliar to managers and staff with no specialist training in racial equality.

There were a number of difficulties concerning the interpretation and use of the Standard. Seventeen local authorities reported difficulties in applying the Standard to the activities within the council. For each service area, it was a major task identifying performance indicators and monitoring procedures. Distinguishing areas of departmental responsibility also posed problems.

'The major problem with the Standard is that it is not user friendly. Managers within our structure typically find difficulty in understanding the Standard and how its different structures relate to them. There is the need for extensive intervention from specialist officers to translate the Standard into practical, operational outcomes. The CRE Standard is particularly weak on service delivery.'

Eighteen local authorities reported difficulty with the organisation of criteria within the levels. The points raised in qualitative responses identify two main problems: the choice of criteria associated with a particular level, and the difficulty of deciding when a specific level has been achieved.

Difficulties with using the criteria associated with a particular level within the Standard were raised both in the questionnaire responses and in the case study interviews. There was concern that achievement of,

'Difficulty in dividing out corporate or central responsibilities from departmental ones.'

'Some criteria are obscure and difficult to interpret in relation to specific activities and services, for example grant aid.'

'Application of criteria to some of our service areas has proved difficult. For service managers we need to translate the criteria into real outcomes that they understand for their service.'

say, level 3 within one section of the Standard contained requirements that were much more difficult to fulfill than those in other sections.

Respondents also seemed to think that it was possible for an authority to fulfill criteria at a relatively high level of the Standard (again, say, level 3) without actually meeting all the criteria at the

levels. These problems in turn lead to the second area of difficulty: deciding when a level has been reached. It was not clear from the Standard documentation how to interpret progress through the levels.

'The levels and the points/items within each level did not appear to follow logically. We discovered items at higher levels which we achieved without having some of the basic procedures in place.'

'Difficult to assess when you have actually achieved a level and can move on to the next; found in practice that we were undertaking activities in level 5 when lower levels hadn't been achieved.'

'There is a great deal of overlap between areas and levels and no clear guidelines on how to interpret them. It is therefore a matter of doing one's best but then not knowing whether the Standard has been reached.'

'Very repetitive – same questions asked in many areas causing some confusion in completing returns.'

'The Standards have a lot of repetitions and generalisations'

MEASUREMENT

The problem of knowing when a particular level in the Standard has been reached was an issue raised by a number of authorities. The confusion seems to stem from the fact that progress through the Standard's levels involves a process of self-assessment by an authority

'There is difficulty in global/corporate assessment of the whole organisation, as the Council's organisation structure is greatly devolved, with operational autonomy at unit level.'

'Our difficulty in using this document is based on the fact that it reflects a centralising and old-fashioned management style which is not what (the authority) aspires to (and possibly not widely seen within local government anymore). The document "race equality means quality" somehow assumes that we can report on "the council" when we are organised into six service departments'

'It's not clear exactly what the Standard is that we are trying to achieve – we need measurable outcomes.'

that may or may not mean setting and achieving specific targets. The Standard does not appear to set nationally defined benchmarks against which an authority can measure itself.

The qualitative data received through the survey uncovered further issues concerning the application of the Standard within local authorities. The Standard appears to assume that the local authority functions as a corporate body and can be assessed as a whole. In reality, many local authorities have devolved structures, making such corporate assessment difficult.

In many authorities, racial equality is dealt with as part of a general equalities strategy; a Standard that addresses generic equality issues would therefore be beneficial.

'As a county with a very small ethnic minority population we decided to adopt the audit tool and broaden it out to include gender and disability.'

CONCLUSIONS

Local authorities had a wide variety of problems when they tried to use the Standard. One of their principal problems was that they were not sure how the Standard should be used in the context of the changing framework for quality within local government. Clearer guidelines are needed to relate the Standard to 'Best Value'. The Standard needs to be rewritten to take account of language and layout; levels; and clarification of the Standard or self-assessment. Any revised Standard should consider the need for guidelines that take account of new local government structures. Proposed revision should also consider the possibility of a generic equalities standard.

5. CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

The CRE Standard was sent to local authorities in 1995. By the time this study was carried out, councils had had three years in which to implement the Standard. As the survey results demonstrate, the response to the Standard over this period has been mixed. The overall take-up of the Standard is less than satisfactory at 57 per cent. Underlying this figure is a pattern indicating that adoption of the Standard is directly related to the size of the ethnic minority population in the local authority's constituency.

While there are exceptions, in general, local authorities with very small ethnic minority populations have failed to adopt the Standard. There was strong evidence from the qualitative research that councillors and officers in areas with very low ethnic minority populations thought that racial equality was not an important issue for their authority.

Scotland, with a small ethnic minority population in many of the districts, has had a relatively high adoption rate. This may be explained by the strong promotion of the Standard by the Scottish CRE and linking of the Standard to other equalities work on gender and disability.

Section 71 of the Race Relations Act, which lays an obligation on local authorities to pursue racial equality, does not act as a sufficient force to encourage authorities to engage actively with the Standard. The introduction of the Audit Commission's Performance Indicator on racial equality may have the effect of increasing adoption rates for the Standard during 1999/2000, but it is unlikely to have a major impact on the use of the Standard in reluctant authorities. Interviewees in the survey argued that stronger mechanisms of enforcement were needed for the Standard to make significant progress, especially if there were cost implications in its implementation.

Adoption of the Standard, however, does not mean that local authorities will work actively towards the development of racial equality practices and procedures. The Standard provides a methodology which local authorities can use to develop racial equality policies and practices, but it was evident from the survey that adoption of the Standard and publication of a racial equality statement do not necessarily lead to action.

A number of local authorities felt that it would be very difficult to justify expenditure on expensive data collection and monitoring procedures in areas where the ethnic minority population was small. It was further argued that, to do so, would go against the principles of 'Best Value' that were currently driving management within local government.

A recent consultative document, however, issued by the Department of the Environment, Transport and the Regions and the Audit Commission, has included assessment against the Standard as a new Best Value performance indicator. Also included in the new list are indicators covering ethnic minority employment and adherence to the CRE's code of practice for rented housing (DETR 1999). The effects of these proposals will need to be monitored carefully over the next two to three years.

It is clear, therefore, that if the Standard is to be seen as a *national* Standard, then consideration needs to be given to the way in which it will operate within *all* local authorities. This requires a review of the Standard document itself and the way in which it relates to the new regimes within local governance. It is also important to consider the link between the CRE Standard and other forms of equality work through the creation of a generic equalities standard.

The preference for a generic equalities standard emerged from a range of local authorities. Some officers working in areas where there was a small ethnic minority population felt that it would be easier to develop racial equality practices within a broader framework for equalities. There were a number of examples of local authorities in the whole sample which had adapted the CRE Standard to a more general equalities approach. They were also using their own documentation for auditing purposes.

The survey showed that local authorities that had adopted the Standard had experienced a range of difficulties in its use and implementation. A fundamental question arose about the use of the term 'Standard', when applied to the CRE document. Here, the problem was that the document did not contain a clear set of guidelines to which authorities could work. Instead, it provided a quality management model for driving up standards of racial equality within local authorities.

The Standard does provide for some clear and measurable outcomes, but in important areas such as monitoring and data collection there are no guidelines for 'minimum' or 'desirable' standards to be achieved. Responses to questions specifically about the document show that the internal validation associated with self-assessment through the REMQ process was insufficient for many local authorities. The interpretation of levels within the Standard was a problem

for many local authorities and the qualitative data suggest that local authorities would prefer a standard with definitive measurable outcomes that can be externally validated.

The principle of a standard based upon a definitive set of outcomes is contrary to the principles underlying REMQ, which is a quality based self-assessment model. Within this model, it is left to local authorities to determine outcomes to meet their own *local* circumstances. This approach accords with the nostrum of 'fitness-for-purpose', which underpins much of the quality management philosophy.

Part of the problem in implementing REMQ seems to lie in the capacity of local government effectively to operate a quality management system. At the outset, the CRE Standard has presumed a level of understanding and competence in the management of quality that does not yet exist in local government.

Local authorities have been involved for the last decade in a range of quality initiatives, but these often relate to a particular process within local government (LGA, 1999). The CRE Standard, in effect, establishes a Total Quality Management (TQM) model for developing racial equality. TQM has not been widely used in local government, where quality has often been managed on an *ad hoc* and fragmented basis. Since the introduction of 'Best Value' regimes in local government, there has been growing interest in TQM and the Business Excellence Model, with around 100 authorities currently exploring this approach (British Quality Foundation, 1999). These developments imply that an increasing number of authorities will be familiar with the self-assessment approach used in the Standard and will have the managerial capacity to deal with it.

Increasing use of TQM in local government should ensure increasing competency in dealing with quality based self-assessment. However, a problem that emerged in interviews with officers in local authorities where TQM had been adopted as a business management tool was how to relate the CRE Standard to the Business Excellence Model. The continuation of the CRE Standard as a separate self-assessment system alongside TQM was unsatisfactory, and it was necessary to integrate the two approaches.

Despite the growing interest in the Business Excellence Model, the development of TQM is at a very early stage and, even where there is a commitment to it, it may be accompanied by a weakening 'corporate' management ethos. In section four of the report the comments from three authorities reflect a tendency during the 1990s, as local authorities became more customer oriented, to devolve power to departments or units. This raises a question about the capacity of local authorities to deliver strategic, 'whole-authority' objectives such as racial equality. It further raises a question about whether it is realistic,

through the Audit Commission, to set performance indicators for a whole authority, or whether a standard should be applied to particular services. The principle of an authority-based standard is desirable in terms of providing community leadership in racial equality and the current debate on modernisation may strengthen strategic management in the future.

The survey showed that local authorities experienced considerable difficulties in the use of the Standard, difficulties that are rooted to some extent in the structure of the Standard. The elision of the notion of a 'standard' and a 'self-assessment framework' is itself the source of some of the confusion. The main body of the document consists of a series of measurements and outcomes which would be used by a local authority in developing its equality practice.

The document itself does not set out a methodology, or a set of guiding principles, through which the framework can be interpreted. The language used in describing measurements does not set a definitive standard; rather, it is a goal-setting mechanism to be used in a continuous quality improvement process. The bringing together of the concept of a standard with the idea of continuous improvement in racial equality practice has led to some of the difficulties experienced in the application of the Standard. The continuous improvement approach leads to a language that is suggestive rather than definitive, and this has resulted in the comments from local authorities about 'outcomes' not being clear and the confusion over the transition from one level to the next.

Within the Standard, the developmental logic between levels is not properly established. A number of local authorities point out the lack of clarity in the location of 'measures' within a particular level. 'Why are certain actions level 1, while others are level 3?' asks one officer. There are two problems here with the Standard. Firstly, the absence of explanatory notes means that the logic of the document is not made transparent to users. Secondly, there seem to be actual inconsistencies in the way in which the Standard has been drafted that require correction. The logic that has been imposed on the structure by the Audit Commission in the development of its Performance Indicator is useful and could form a basis for re-examining the location of measures within the levels of the Standard. The Audit Commission's broad definitions for the Standard have been used in the CRE's recent guide, *Auditing for Equality* (CRE 1999) (see p 35).

The structure of the Standard and the absence of guidance and explanatory notes means that it is not a very 'user friendly' document (a point made repeatedly in the questionnaire responses). A further problem is the use of language, which some of the interviewees felt was inaccessible for non-specialists in equality work.

AUDIT COMMISSION DEFINITION OF THE STANDARD

Level 1:	The council has a written racial equality policy statement.
Level 2:	The council has an action plan for monitoring and achieving its racial equality policy.
Level 3:	Results of ethnic monitoring against an equalities policy and consultations with communities are used to review the overall standard.
Level 4:	The council can demonstrate clear improvement in its services resulting from monitoring, consulting with local communities and acting on its equal opportunities policy.
Level 5:	The council is an example of best practice in the way it monitors and provides services to ethnic minorities and is helping others to achieve high standards.

The Standard needs to be easily understood and interpreted by managerial staff across a wide range of services. The language and methods should therefore be easily understandable and there should be guidelines for services on the development of appropriate measures, outcomes and procedures. A first step has been taken in providing guidance on auditing with the publication of *Auditing for Equality* (CRE 1999), but the central problems posed by the Standard have not begun to be approached.

In a general sense, the research points to a significant interest in the Standard, but its impact on changing racial equality practice has, so far, been limited. Many local authorities have found the Standard to be useful in providing a template or checklist for their activities. Others found the initial document to be an important spur to activity in the development of racial equality policy or around auditing. However, very few local authorities in the survey have used the Standard as a sustained form of action. The Standard has been a 'focus for attention' rather than a 'framework for action'.

To summarise, the main conclusions from the study are as follow below:

- The Standard has acted as a focus for racial equality work in local authorities with significant ethnic minority populations.

- In general, local authorities have not accepted the premise that racial equality is central to quality in service delivery, and there has been inadequate support for this principle from the Local Government Management Board, the DETR and local government organisations.
- Local authorities, with some exceptions, have been slow in adopting and implementing the Standard.
- Local authorities have not moved ahead with the implementation of effective monitoring because of the cost implications.
- The Standard presumed a level of understanding and managerial competence in quality management methods which did not exist at the time.
- The external driver for the Standard, Section 71 of the Race Relations Act, has been insufficient to secure general adoption of the Standard.
- The Audit Commission performance indicator in England and Wales may increase the adoption rate for the Standard, but it is unlikely to drive racial equality policy in authorities with small ethnic minority populations.
- Ethnic minority populations vary considerably between local authorities and the Standard does not address these differences in context.
- The development of the Standard may benefit from a closer link with other areas of equality work, through the creation of a generic equalities standard.
- The Standard brings together the principle of a 'self-assessment framework' with the concept of a 'standard'. These concepts are not made sufficiently clear.
- The developmental logic between levels is not clearly established and the measures described at each level are often difficult to understand.
- The presentation of the document is not 'user-friendly' and there is insufficient guidance and supporting documentation on the application of the Standard.

The prospects for developing the CRE Standard in the light of a changing local government system seem to be strong. The introduction of Best Value and the modernisation agenda for local government should help to create a climate in local government which will be

more attuned to quality management. The prospect of an increasing number of local authorities adopting the Business Excellence Model or other forms of Total Quality Management is an important context through which the Standard can develop. The new climate for racial equality following the Stephen Lawrence inquiry has brought an increased awareness of institutional racism, and the managerial approach offered by the Standard represents an important means by which institutional racism can be addressed. However, in order to develop the Standard, it is necessary to review its structure and documentation to take account of the conclusions from this study.

RECOMMENDATIONS

- The Standard document should be reviewed to take account of the following:
 - the need for a definitive Standard
 - the need for a generic Standard
 - the location of criteria within the levels of the Standard
 - the interpretation of measures.
- Consideration should be given to additional mechanisms to drive the Standard, including new legislative measures and external audit procedures.
- Consideration should be given to supporting documentation which explains the logic of the Standard and provides guidelines.
- Consideration should be given to the best ways of integrating the Standard with current practices within local government, including Best Value and the Business Excellence Model.
- A relaunch of the Standard should be undertaken, making explicit its role in combating institutional racism.
- The Improvement and Development Agency, the LGA and the COSLA should be encouraged to become partners in establishing and launching a new Standard.
- Urgent guidance should be given on a consistent approach to defining an authority-wide level against the Standard.

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Extensive use was made of local authority committee reports obtained from the Local Authority Race Relations Information Exchange. These reports are referenced as, for example (*LARRIE* 123456) where 123456 is the document reference number. We are grateful for the help of Charmaine Grey and Sarah Palmer at LARRIE for providing this material.

APPENDIX 1: METHODOLOGY

The core of the project work consisted of two parts. The first was the construction and delivery of a postal questionnaire (see Appendix 2) to a sample of local authorities. We aimed to get responses from a minimum of fifty authorities, taking into account the following:

- geographical spread across all regions (England, Wales and Scotland)
- concentration of ethnic minority population
- unitary and non-unitary authority status
- metropolitan and non-metropolitan authority status

The second was a series of case study site visits, during which interviews were held and documentary material collected.

THE SAMPLE

We assumed the size of the ethnic minority population within the local authority area and local authority status to be the two key independent variables. We also made adjustments for the proportion of each authority status within the total number of authorities. We produced a random stratified sample of authorities drawn from the LGMB membership list for England and Wales (using the categories London borough, metropolitan borough council, district council, county council and English and Welsh unitaries) and the COSLA listing for Scotland. We used 1991 census figures for percentage of ethnic minority population using the categories >9.5%, <9.4% >1.1% and <1%. Local authority reorganisation caused some problems and we had to make assumptions about the ethnic minority populations of unitary authorities based on figures for their pre-existing components.

We aimed to get detailed questionnaire responses about ten per cent of authorities nationwide and so sent out questionnaires to a sample of about 15 per cent of authorities. Meeting the ten per cent figure required a great deal of time on the telephone. Meeting the criteria of randomness, spread of authority types, different sizes of ethnic minority population within the constraints of sample size proved quite difficult. We achieved a good geographical spread of authorities using the two main variables.

QUESTIONNAIRE DESIGN

The questionnaire was designed to balance the collection of basic numerical data (partly to compare with the Commission's own survey returns) and to provide qualitative material for generating profiles to compare with the more detailed case study material.

The questionnaire was divided into three strategic areas:

- performance against Audit Commission racial equality performance indicators
- adoption, use and problems in use of the Standard as an evaluative tool
- detail of review and monitoring mechanisms.

WHO DEALT WITH THE QUESTIONNAIRE?

We wrote to the chief executives of the authorities in the sample explaining the nature of the research project. They were asked to designate an officer to complete the questionnaire. The officer to whom the questionnaire was sent and their location within the authority turned out to be an interesting indicator of the location, development and importance of (racial) equality work in that authority.

The London boroughs dealt with the questionnaire through central policy or equalities units, with specialist officers making the response. Additional material showed clear evidence of commitment to work in the area of racial equality both in employment and service delivery. The story for metropolitan boroughs was very much the same. These results are not surprising given that the responding authorities in these two categories have relatively high average ethnic minority populations: 25.3 per cent for London boroughs and 8.6 per cent for metropolitan boroughs and have long developed racial equality policy and practice.

When we examine two categories with relatively low average ethnic minority populations: county councils (1.9 per cent among our respondents) and district councils (2.2 per cent among our respondents), a different picture emerges. County council chief executives directed the questionnaires to central policy or corporate policy units that had both employment and Service delivery remits. There was, however, not the same evidence of long-standing equalities work as for London and metropolitan boroughs. Responding district councils directed questionnaires in more than 80 per cent of cases to personnel departments. Additional material supported the view that these councils conceive of equal opportunities in terms of employment and that only a few have given thought to equality in service delivery.

Although there is clearly a relationship between the relative size of the ethnic minority population and the development of racial equality policy and practice in all areas of council activity, it is not simple and straightforward. District councils differ from the other categories in that they have neither education nor social services departments. These have been service areas in which race equality has been a long-term research and policy concern.

QUESTIONNAIRE RETURNS

In total, 89 authorities were approached. Five declined to participate. Fifteen did not respond at all. Fifteen did not return their questionnaires. Fifty-four authorities returned completed questionnaires, together with a wide variety of supporting material.

Table A1. Questionnaire returns

Category of local authority	Total	Returned	%
All	89	54	61
Counties	7	6	86
Districts	28	15	67
London	12	7	58
Metropolitan	11	9	82
Scotland	21	10	48
Unitary	10	6	60

THE CASE STUDIES

The case studies were selected to draw on a sample of different authorities: one shire county, two small district councils, two London boroughs, two metropolitan boroughs, one Welsh council and two Scottish local authorities. Each study was based on a site visit, which took place over a single day. Interviews were carried out with officers designated by the chief executive or equivalent and relevant documentation was collected for analysis.

The case studies were based, mainly, on interviews with one or two key officers within an authority. The purpose of these interviews was to provide a stronger qualitative account of the way in which the Standard was being managed within the authority. Within the report these case studies have helped to shape the qualitative content of the report as well as the conclusions and recommendations.

In February 1999 we were asked to carry out a partial audit against the Standard by one of the London boroughs. This work provided a valuable opportunity to examine the implementation of the Standard in an authority that has a long history of commitment to racial equality policy and practice. The work involved interviews with heads/deputy heads of service and also with officers charged with implementing various aspects of racial equality policy. This has provided additional qualitative material and has provided a better understanding of the difficulties that can be encountered in implementing the Standard. In particular, we were able to examine in more detail the relationship between policy and planning activity, service delivery and service monitoring.

APPENDIX 2: THE QUESTIONNAIRE

A summary of the questions used in the questionnaire is provided below.

STUDY INTO THE EFFECTIVENESS OF THE LOCAL AUTHORITY RACIAL EQUALITY STANDARD

The following questionnaire forms part of a study, which is being conducted by the Centre for Local Policy Studies on behalf of the Commission for Racial Equality.

To fill in this questionnaire you may need to refer to the Audit Commission Document 'Performance Indicators for the financial year 1998/99' and the CRE Standard document, *Racial Equality Means Quality*. One purpose of the study is to identify 'good practice' and we would request that the following documents (where they exist) be submitted with the questionnaire for analysis: Equal Opportunities Policy Document, Racial Equality Policy Statement, Report of the meeting where the Standard was adopted.

Section 1: Performance

1. Have you evaluated yourselves as a local authority for the Audit Commission Performance Indicators, Section A7, 1998/99?

If yes, please state at what level you have evaluated yourselves.

If no, have you begun evaluation?

2. Please describe what stage you have reached in the evaluation.
3. Have you had any difficulties in carrying out the self-assessment for the Audit Commission performance indicators set out above?

4. Does the authority have the following:
 - a) a comprehensive, published, equal opportunities policy, which meets the Audit Commission requirement for Performance Indicators 1998/99 (Audit Commission Performance Indicator A6a)?
 - b) a race equality policy statement?

Section 2: Evaluation Process

5. In carrying out the self-assessment, have you used the document *Racial Equality Means Quality* as a basis for this process?
6. Have you formally adopted the document *Racial Equality Means Quality* as a basis for assessing performance on race equality?

If yes, please give the date of the Council's formal adoption and enclose the supporting minute.

If no, do you intend to adopt the document:

- (a) within 6 months
- (b) within 12 months

7. Have you experienced any difficulty in using the document *Racial Equality Means Quality*?

If yes, can you indicate which aspects of the document were a problem and tell us about the difficulties you experienced, in the space provided:

- a) layout and organisation of the document
- b) language/terminology used in the document
- c) difficulty in interpreting levels in relation to your activity
- d) criteria associated with the levels.

Section 3 : Implementation

8. How have you communicated the content of *Racial Equality Means Quality* within the local authority?
9. Which local authority committee is responsible for implementing the performance criteria associated with *Racial Equality Means Quality*?
10. Do you have a system for performance review?

If yes, please describe the system you use for performance review.
11. What performance criteria have you adopted for racial equality?
12. Which service areas are the criteria applied to?
 - a) all service areas
 - b) specific service areas.
13. How will the criteria you have adopted be monitored?
14. How is monitoring used to improve the quality of service?
15. Do you have any specific plans for improving quality and raising compliance with the Standard to another level? Please describe your plans.

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