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**Sent:** 19 April 2011 16:26

**To:** Specific Duties

**Subject:** Public Sector Equality Duty consultation

You have asked for views on the suggestions for reducing bureaucracy in the Public Sector Equality Duty and having read the consultation document our Research Centre would like to make the following comments.

"challenge from the public"

Rather than awaiting challenges would greater transparencies not be made by thorough consultation beforehand with the service providers aiming to be proactive?

"Focusing on measurable results: to reduce the time public bodies spend fulfilling repetitive or unproductive processes and instead focus on what works"

Is this going to turn into another statistic juggle rather than consulting with users and getting meaningful data?

"Challenge from the public will be the key means of holding public bodies to account for their performance on equality"

We feel that rather than councils being proactive they will await challenges and therefore be reactive. We agree that the public should monitor the success of the interventions however this is surely dependent on the public being made aware of the legislation? As there appears to be a lack of consultation how can this be achieved?

"Publish information to demonstrate its compliance...";

We fear this will allow public bodies do what is minimally required so that they can produce the minimum amount of evidence

"Remove the requirement to publish details of the engagement the public authority undertook with persons whom it considered to have an interest in furthering the aims set out in section 149(1) of the Act, and details of the engagement it undertook when developing its equality objectives"

This is concerning as this means that the amount of public consultation and engagement can be minimised. We fear this would allow public bodies to leave everything to the last minute, maybe not even consult anyone.

"Information to help public bodies comply with the duties and understand what constitutes good practice will be delivered through guidance, not regulation"

Again this is a bit concerning. If the public bodies don't need to demonstrate an understanding of good practice it might not be accurately measured.

Setting the threshold at 150 or more staff allows a considerable number of public bodies to slip through the net e.g. many local and District councils. It's often these smaller public bodies that more closely interface with disabled customers – we should be looking to increase involvement with them and not give them more room to get away from providing accessible services.

suggestion for amendments

\*When publishing the objectives and reviewing them at regular intervals, it may be more appropriate to state exact time scales as 'no greater than 4 yearly' may mean public authorities only publish when the 4 year deadline approaches. Is 4 years sufficient ? as even changes in staff could be considerable during a 4 year period.

Public authorities with staff of less than 150 do not require to set objectives. This would mean that many companies/ authorities would be exempt from the duty and therefore many would not concern themselves with 'promoting equality and changes in people's lives and experiences'. Ensure that all public authorities set objectives and employee characteristics when workforce is over 50.

Detail of how the information is going to be accessible to the public ? Will it mean that practise will change just because the public can read and challenge the objectives?

Exact time scales for review i.e. possibly every 2 years and certainly when changes have taken place in the workplace.

Regards

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