

Dear Harshbir

I am writing in response to the policy review paper released by the GEO on the 17th March (the public sector equality duty: reducing bureaucracy)

I am chief executive of a company providing advice to the learning and skills sector. I work with national organisations such as Ofsted, LSIS, AOC, ALPS and individual organisations. My client base includes 87 colleges, 52 adult community learning providers and 28 work based learning providers. I have worked in the public sector (education) for over 25 years

I welcome the proposed date change for the public sector organisations to publish information. The original date for 31st July for the learning and skills sector did not make sense when schools had a Dec date, and achievement data for students is not ready until October each year.

However, I have three major concerns with the proposals

1. I am disappointed that formal consultation is not taking place. It gives the impression that 'minds are already made up' and the opportunity to comment on the draft regulations given on page 7 is meaningless. I sincerely hope that this is not the case

2. Proposal to remove the requirement to publish details of engagement activities when determining equality objectives
This seems to be a retrograde step. The specific duty to involve disabled people empowered disabled people to change practice. Without a specific duty to publish details of engagement activities when determining equality objectives, the regulations seriously weaken previous legislative requirements. My understanding is that one of the intentions of the Act is to strengthen the law, encouraging a faster pace of change to tackle persistent areas of inequality. This therefore seems a contradiction. Publishing details of engagement activities provides transparency on how equality objectives were developed and would enable the public to hold organisations to account; again, this is my understanding of the Government's agenda

3. Proposal to remove the requirement to publish details of the equality analysis organisations have undertaken when reaching policy decisions
In a climate of continuing financial cuts it is imperative that public sector organisations consider the equality impact when reaching policy decisions. Without a specific duty requiring public sector organisations to publish details of the equality analysis, the reality is that many will not do this. Effective equality analysis will help tackle persistent areas of inequality and this proposal again appears to be a retrograde step.

I am also concerned about the proposals to remove

- the word sufficient
- the requirement to set out how progress will be measured

both support an organisation to meet the general duty and help ensure

- transparency
- progress is outcome focused, rather than process driven

I sincerely hope that the government revises their proposals so that the above concerns are addressed.

Thank you for giving me the opportunity to comment on the draft regulations

Kind regards
Christine

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