CASE STUDIES

Delivering Public Services to a Diverse Society

REPORT BY THE COMPTROLLER AND AUDITOR GENERAL | HC 19-II Session 2004-2005 | 10 December 2004
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CASE STUDIES

Delivering Public Services to a Diverse Society
This report has been prepared under Section 6 of the National Audit Act 1983 for presentation to the House of Commons in accordance with Section 9 of the Act.

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Comptroller and Auditor General
National Audit Office
6 December 2004

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CASE STUDIES
Four case studies were undertaken to identify planning strategies behind initiatives that have led to progress in meeting the needs of diverse clients, and that can provide lessons for other government bodies. We began by identifying government bodies that are undertaking service delivery initiatives which they themselves consider to be ‘good practice’, largely through the results of the RAND Europe/NAO survey carried out as part of this study.

From an initial shortlist of potential case studies, a final selection was made through consultations amongst RAND Europe, the NAO, the Cabinet Office and the individual government bodies concerned. The bodies studied and their ‘good practice’ service delivery initiatives are:

**National Gallery**

Art Through Words (ATW), a programme designed to make the collection of the National Gallery accessible to blind and partially sighted people.

Each case study included document reviews and in-depth interviews with staff involved in the initiatives at various departmental managerial levels, including front line providers. Additionally, information from service recipients was obtained via focus groups, group interviews, or participant observation, depending on the case.

The protocol used to guide all of the information gathering for the case studies is presented in the Annex to this volume.

**Crown Prosecution Service**

Development and launch of the Public Policy Statement on Racist and Religious Crime.

**Inland Revenue**

Outreach activities to address the needs of small and medium enterprises in the Bristol and North Somerset Area.

**Learning and Skills Council**

Provision of secondary education to adult women, supported by the Joseph Chamberlain Sixth Form College and hosted by Bordesley Green Girls’ School in Birmingham.
1.1 This chapter examines the formulation and launch of the Crown Prosecution Service’s (CPS) public policy statement on racist and religious crime. This public policy statement (the Statement) was launched nationally in July 2003. Public policy statements aim to set out clearly, for both CPS staff and members of the public, the CPS’s prosecution policy. Public policy statements are published in a user-friendly booklet format and set out policy in plain and easy to understand language. Previous CPS public policy statements have addressed domestic violence (November 2000) and homophobic crime (November 2002). The formulation of the Statement on racist and religious crime is particularly noteworthy for the way in which consultations with stakeholder representatives were organised.

The role and structure of the Crown Prosecution Service

1.2 The Crown Prosecution Service prosecutes people in England and Wales who have been charged by the police with a criminal offence. From Spring 2004, the CPS began to take over charging responsibilities from the police. According to the CPS’s race equality scheme, its role is to prosecute cases firmly, fairly and effectively when there is sufficient evidence to provide a realistic prospect of conviction, and when it is in the public interest to do so.\(^1\)

1.3 The Director of Public Prosecutions heads the CPS; the Chief Executive is responsible for the administration of the CPS; and the Attorney General superintends the Service and reports to Parliament. The CPS is organised into 42 geographical areas, essentially matching the 43 police authorities in England and Wales (the discrepancy arises because there are two police forces in London, the Metropolitan Police and the City of London Police). Each area is headed by a Chief Crown Prosecutor who is responsible for the quality of prosecution services in their local area. Each Chief Crown Prosecutor is supported by an Area Business Manager who is responsible for delivering the administration in support of prosecution services in the local area. The CPS has two HQ buildings – in London and York – that deal with administrative and other national issues. The CPS also has a Policy Directorate (PD) and an Equality and Diversity Unit (EDU).

Equality and diversity in the Crown Prosecution Service

1.4 Public confidence in the British Criminal Justice System is low, particularly among Black and Minority Ethnic communities. The 2000 British Crime Survey\(^2\) indicates that (i) Black and Minority Ethnic people are more likely to be victims of crime than are White people; (ii) a high proportion of assaults, threats and vandalism experienced by Black and Minority Ethnic people are judged by victims to be racially motivated; and (iii) people from Black and Minority Ethnic communities worry about crimes more than do White people (Figure 39).

1.5 Together with the other bodies that make up the Criminal Justice System, the CPS is responsible for promoting public confidence in the system. The CPS can promote such confidence by ensuring that prosecution decisions are free - and seen to be free - from bias and discrimination. The CPS aims to remove barriers that prevent different groups of people from having equal access to services. To do so, it recognises the need to identify differences amongst the communities it serves, in terms of their access to criminal justice services and their perceptions of these services.

1.6 The CPS has several organisational structures and mechanisms designed to address equality and diversity issues regarding staff composition and, crucially for the present case study, the conduct of prosecutions. These consist of individuals with specific responsibilities relating to equality and diversity, committees and networks, and a central unit with equality and diversity responsibilities (Box A).

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1 Crown Prosecution Service Race Equality Scheme: Meeting the needs of diverse communities and improving prosecutions, May 2002.
The initiative: Public Policy Statement on Racist and Religious Crime

1.7 In November 2002, the CPS established a working group to formulate a public policy statement on the CPS’s policy on the prosecution of racially and religiously aggravated crimes. The objectives of the Statement were.

- To contribute to improving Black and Minority Ethnic communities’ confidence in the Criminal Justice System by 2006. This objective is contained in the Criminal Justice System’s joint Public Service Agreement for 2003 and beyond.
- To demonstrate a commitment to promoting racial and religious equality by ensuring broad public access to information, as set out in the CPS’s Race Equality Scheme.
- To improve the way in which cases with an ethnic minority dimension are dealt with, as recommended in the CPS Inspectorate’s thematic review of such casework.

The formulation of this public policy statement was an important priority for the CPS, since the Service recognised that a failure to produce it would put at risk its ability to achieve its Public Sector Agreement targets, and to improve its public reputation and its partnerships with other bodies in the Criminal Justice System.

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1.8 The working group on racially and religiously aggravated crime was given the task of formulating the Statement through external consultations and ensuring its implementation (Box B). The Statement was published and launched nationally in July 2003. Since the national launch, CPS regions and areas have been given the responsibility for launching and implementing the Statement in their localities.

1.9 This case study examines the development and launch of the Statement on racist and religious crime. The case study also provides some early indications of how the Statement is being implemented at the levels of the regional and local areas. In particular, the launch in the North West Region of the CPS was examined. The findings presented in this case study are based on key informant interviews (including representatives from community groups) (Box C) and supporting document reviews. Figure 32 provides an overview of activities and key milestones in developing the Statement.

**BOX B**

**Membership of the CPS working group on racially and religiously aggravated crime**

The working group, established in November 2002, consisted of 11 CPS staff

- Members from the Policy Directorate took the lead in drafting the policy statement.
- Members from the Equality and Diversity Unit provided overall support.
- Members from the Casework Directorate provided expertise on racial incitement cases.
- Regional Equality and Diversity Officers provided community perspectives and led regional and local consultations.
- CPS prosecutors with expertise in this area provided additional expert advice.
- A Chief Crown Prosecutor, as Chair, led the Group.
- The Director of Public Prosecutions, the Attorney General, the CPS Board and the Senior Managers Advisory Group on Diversity provided wider leadership and support to the formulation of the Statement.

In March 2003, following the national consultation event, the working group’s membership was extended to include external community representatives to ensure that a broad range of perspectives were taken into account.

The composition of the working group was diverse in terms of expertise, job grade and ethnic background. The internal mix of the group is considered to have had a positive impact on the approach adopted and the resulting policy. For example, given the ethnic diversity of the team, members were able to discuss issues both as experts in their field and as informed members of minority communities. It would have been more difficult for a homogenous working group to bring credibility to the policy development process.

**BOX C**

**Key informant interviews**

This case study is based on 13 key informant interviews: nine with CPS staff; one with the CPS Inspectorate; and three with representatives from community groups. In more detail:

- Seven of the eleven CPS members of the working group; including the Chair, the Equality and Diversity Officer for the North West region and at least one member from each representative unit;
- Chair of the Senior Managers Advisory Group on Diversity and the Chief Crown Prosecutor for South Wales;
- Chief Crown Prosecutor for Cheshire (North West region);
- HM Chief Inspector, HM CPS Inspectorate and;
- Representatives from three local/national community groups; two of whom were members of the working group, the other being involved in the North West regional launch.

These interviews provided information on the:

- Development of the Statement by the working group;
- Implementation of Statement in the North West and other regions;
- Involvement of community groups in the development, launch and implementation of the Statement; and
- Performance of the CPS in dealing with race related cases.
A key success factor: External consultation

1.10 External consultation is considered to have been an essential part of developing a credible Statement on racist and religious crime. The attention given to external consultations was partly a response to lessons learnt from developing past public policy statements on homophobic crime and domestic violence. In these cases, the CPS received some criticism that the consultations had not been representative enough, resulting in some unfavourable media reports questioning the credibility of the policy. The working group on racist and religiously aggravated crime learnt from these experiences by organising external consultations with a wide range of affected stakeholder groups. Events were organised at national and regional levels to involve stakeholder groups, and internal consultations were held with staff (Box D).

1.11 The involvement of external stakeholders allowed the working group to gain access to valuable information on racist and religious crime that would not otherwise have been available to them. Some of the stakeholder groups included in the consultations have third party reporting centres. Crimes that are not directly reported to the police are often reported to these centres. In formulating its public policy statement, the working group was able to use these local data, in addition to official statistics, to provide a more complete picture of the situation.

1.12 These consultations had a clear impact on the draft Statement in terms of its substance, style and format. As a result of the feedback from the consultations, the final Statement is written more from the perspective of the communities it aims to address, rather than from the perspective of the CPS itself. For example:

- The policy statement begins by explaining why these issues are important to society as a whole, rather than beginning with the importance of this area in terms of CPS’s responsibilities and targets.
- It devotes more attention to setting out clearly the decision-making processes within the CPS and where the CPS sits within the Criminal Justice System.
- It uses clear and easy to understand language, which is more accessible to the community at large.

**BOX D**

Consultations for developing the Statement on racist and religious crime

- **National consultations**
  Representatives from national and regional interest groups were given the opportunity to contribute to the Statement. The Statement lists 121 organisations as consultees. They were invited to participate in a national consultation by taking part in a focus group in March 2003 or by providing written comments on drafts of the Statement. Of these, representatives from 19 organisations attended the focus group and 16 responded with written comments. The working group considered this response to be high.

- **Regional consultations**
  Following the national consultation, most regions, led by Regional Equality and Diversity Officers, carried out consultations with local umbrella groups (that represent several communities) to take local community concerns into account.

- **Internal consultations**
  Later drafts of the Statement were also circulated internally to the CPS Board, Chief Crown Prosecutors, Equality and Diversity Officers, Area Staff Sounding Boards, and other staff groups, associations and networks for comments.

- It devotes greater attention to the policy on accepting pleas (plea bargaining), which emerged as an issue of great concern during the consultation process.
- It states that direct communication between prosecutors and victims is required to explain decisions taken by the prosecution. Such face-to-face meetings between victims and lawyers existed for other serious crimes and have been extended to racist and religious crimes.
- Compared with earlier drafts, the final policy statement also focuses more on establishing enduring links with community organisations. A list of consultees is included in an annex to the statement.
In addition, CPS staff and some of the representatives of stakeholder groups we interviewed reported that consultation has also had a positive impact on the way in which the statement is perceived by Black and Ethnic Minority community groups. It strengthened the credibility of the policy statement. Identifying the impact of a particular consultation exercise is, however, fraught with uncertainty. As our respondents pointed out, improvements in the public’s perception of the CPS and the Criminal Justice System cannot be attributed to an isolated event, such as this particular consultation exercise. Rather, these gains can only be won through sustained efforts by many individuals and agencies throughout the Criminal Justice System.

The impact of consultations is also evident in the implementation of the public policy statement. The consultation process helped to gain the support of minority communities in implementing and monitoring the Statement. For example, following the consultation process in the North West, the local consulted groups have been involved in launching and rolling out the Statement, and are currently involved in the monitoring process.

Challenges faced in conducting an effective consultation

The working group faced two challenges in undertaking the external consultation process:

- Changing community groups’ negative views of the consultation process. At the early stages of the regional consultations, the Equality and Diversity Officers had to work hard to change community groups’ views – partly resulting from negative experiences in earlier consultation exercises - that the consultation process was a formality and that the policy had already been decided.

- Managing short lead-times. The timeframe for regional and local consultations was limited to three weeks to meet the scheduled Statement launch date of July 2003. National guidelines suggest a period of three months for full consultations. Although there were calls for more time for the regional consultations, the planned timeframe was changed only marginally.

The main challenge for the consulted groups in participating in the consultations was a lack of resources (in terms of staff, time and money) required to respond to the working group’s draft Statement. This was particularly the case for the smaller local organisations. For example, the Racial Equality Council of Cheshire, Halton and Warrington reported that a lack of resources was the reason they did not respond to the draft statement sent by the working group, although they were later involved in the local implementation. The CPS endeavoured to ensure that limited resources was not a major factor preventing participation in the consultation events. Participants’ expenses were met by the CPS.

Lessons learnt

“[Government] agencies must make an ongoing commitment to build capacity in this [consultation] area and not merely drop in and out to meet their immediate requirements”.

The ability of community groups to participate in consultation exercises emerged as a key issue that needs to be addressed by government bodies. In addition to resources, longer lead times would also aid the consultation process. These would enable community and voluntary groups to consult the communities they represent.

Investing in consultation pays off. Despite the demands on time and resources, the CPS promotes this model of consultation for developing Statements because it increases public confidence and strengthens the credibility of the CPS and its policy.

The ongoing challenge: Implementation

In addition to formulating the Statement, the working group was also responsible for defining the monitoring and reporting framework to support effective implementation of the Statement. Since the policy statement was launched in late 2003/early 2004, it is too early to identify the impact of the statement clearly. Nevertheless, it is possible to identify some of the challenges currently being faced in rolling out the Statement that are relevant to other initiatives to diversify service delivery.

Director, Cheshire, Halton and Warrington Racial Equality Council.
1.20 With a view to implementing the Statement, the working group drew up a communication strategy to provide general guidance on how to launch and implement the Statement locally. The responsibility for communicating the Statement was given to Chief Crown Prosecutors and regional Equality and Diversity Officers. The communication strategy contained recommendations on the actions that should be taken in the regions. For example, it was recommended that there be a regional launch and that the Local Community Justice Boards be used as conduits in connecting with the public and community organisations. A formal launch event was not the only way of promoting the Statement; some regions and areas undertook other activities including communication with local communities and groups and other parts of the Criminal Justice System. **Box E** gives an overview of how the PPS on racist and religious crime was launched and implemented in the North West region. **Box F** gives an overview of how the Statement was launched and implemented in South Wales.

1.21 Although all regions received the same guidance on the implementation of the Statement, there is a substantial amount of variation between regions in the extent to which it has received attention. The follow-up report to the thematic review by HM CPS Inspectorate finds that there are large differences among areas in the communication of the Statement to staff. For example, only a few regions have held a regional launch event. The differences in local implementation can be attributed, at least partly, to:

- Varied levels of priority devoted to the Statement at a local level. Time is the real constraint in ‘championing’ work. Although all Chief Crown Prosecutors are diversity champions for their respective areas, this is an extra role that they undertake in addition to their primary responsibilities. HM CPS Inspectorate found that in CPS areas where the Statement had been launched successfully, the enthusiasm and commitment of senior managers have been transmitted to staff.

- Resistance from front line staff, particularly regarding the granting of face-to-face meetings with lawyers to victims to discuss decisions that had been taken in racist and religious cases. At the outset of developing the Statement, some front-line staff questioned whether this was ‘the most important thing to be done’.

- Emergence of other priorities: the CPS has been undergoing a major organisational change by taking over all charging responsibilities from the police, beginning in Spring 2004.

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**BOX E**

**North West launch**

The regional launch

The five CPS areas in the North West came together, led by the region’s Equality and Diversity Officer, to launch the Statement. The purpose of the regional launch event was to:

- Raise awareness of the Statement on racist and religious crime and the role of the CPS;
- To engage in and develop a dialogue with local minority communities; and
- To increase public confidence by being open and transparent.

The launch took place in Manchester on Saturday 10 January 2004. The place and time were considered carefully. Although Manchester is a central location in the region, it did make it difficult for individuals from further afield to attend. Holding the event on a Saturday meant it was outside work time, but also relied on people giving up their own time to attend.

Over 200 delegates attended, made up of community organisations, voluntary groups, Criminal Justice Agencies and members of the public. The regional launch event was designed to be interactive. It featured a ‘walk through case study’ with interactive voting, question and answer sessions, and an appearance by a television personality. The organisers of the regional launch received positive feedback from participants.

However, given that a large percentage of attendees were from the Greater Manchester area (due to the location of the event) there was some concern that some areas, such as Cumbria and Cheshire, that were not represented as well, may have received a better return on their money if their contributions had been spent locally. In response to this, local area launches are also planned.

The local implementation in Cheshire

In Cheshire the policy was launched internally by circulating copies of the policy to all staff. This was then followed up with team meetings. In this case, the Chief Crown Prosecutor for Cheshire did not personally carry out a Statement ‘road show’, that was instead left to local teams.

- Lack of specific reporting requirements on the local launch and implementation of the policy.
- Variations in regional requirements. Local CPS offices have a local focus, centred on local activities. In general, they are autonomous units that devise independent methods for following general guidelines set centrally.
The Diversity Accountability Committee will monitor regions and areas that have successfully launched. Community groups will be involved in monitoring. The CPS will identify a limited set of equality guidelines and monitoring progress from the centre. Differences in local situations, whilst setting strong implementation. In doing so, it is seeking to accommodate the justifiable differences across local offices, due to differences in local situations, whilst setting strong guidelines and monitoring progress from the centre.

**Looking to the future**

1.22 In view of the differences amongst areas and regions in the implementation of the Statement, the Chair of the working group recognises that the communication strategy should, perhaps, have been set as a requirement rather than as a recommendation. The CPS is currently working to address the regional differences that exist regarding implementation. In doing so, it is seeking to accommodate the justifiable differences across local offices, due to differences in local situations, whilst setting strong guidelines and monitoring progress from the centre.

1.23 To ensure successful implementation, particular attention is being devoted to establishing mechanisms to ensure that local areas and regions report back on the steps they are taking. To move the current situation forward the following mechanisms are being established:

- The Diversity Accountability Committee will monitor implementation activities across the CPS areas as part of its role in monitoring the general performance of local areas. All Chief Crown Prosecutors report quarterly to the Diversity Accountability Committee on the community engagement activities undertaken. Although this reporting structure does not specifically request feedback on the implementation of the Statement, this information may be elicited and appropriate action taken.

- The CPS will identify a limited set of equality outcome measures over the next year and some of these will cover the handling and prosecution of hate crimes, including racist and religiously aggravated crimes. Areas will report to head office on how they deal with racist and religiously aggravated crimes alongside other key business targets and measures.

- Regions and areas that have successfully launched and implemented the Statement will share experiences with others that have not. The sharing of ‘good practice’ will be co-ordinated through the central unit.

- Community groups will be involved in monitoring and evaluating the impact of the Statement.

1.24 In its follow-up report on CPS casework with a minority ethnic dimension HM CPS Inspectorate found that (i) the racist and religious crime policy has been well received, (ii) the level and effectiveness of community engagement has improved significantly, and (iii) all prosecutors have received national awareness training. However, the follow-up report also found that the overall service provided to victims and witnesses has not improved significantly, and that all racist incidents are still dealt with by a relatively small number of designated prosecutors. This highlights the real and ongoing challenges which the CPS faces in mainstreaming equality and diversity issues throughout the Service. While acknowledging the progress made by the CPS, it is imperative that CPS staff at all levels understand the policy on racist and religious crime and apply this when providing services to clients from diverse communities.

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**BOX F**

**Launch and implementation in South Wales**

The Chief Crown Prosecutor for South Wales has responsibility for the local launch and implementation of the Statement. The Statement was communicated internally within local CPS offices and externally to the community.

Internally, the agenda was set for local senior management teams to hold training and awareness sessions, and for each office to make policy presentations to the staff. On an ongoing basis, the front line staff are encouraged to lead on the ground on diversity issues, by linking performance reviews to diversity outcomes. One such example in the South Wales region is the local target for lawyers, who are expected to visit four schools each year to increase public awareness around these issues.

Externally, several publicity initiatives were taken in South Wales, including:

- Press and media coverage, including an interview on BBC local radio, Wales (prime time);
- Public meetings, including 40 school visits highlighting the policy document;
- Criminal Justice Board contacting all key agencies through various committees;
- South Wales police committee on race, incorporating community involvement; and
- Over 40 speeches delivered by the Chief Crown Prosecutor.

To further promote the Statement launch, the local CPS, with support from the Criminal Justice Board, made an educational video tracking a racist case through the Criminal Justice System. The video was recorded as a part of a Criminal Justice Open Day in which 15 students took part over two days. The video will be sent to 58 schools in Wales, with accompanying classroom material for teachers. A larger-scale media launch of the video by the local CPS is likely to result in wider audiences. The video was recognised by an independent panel as a best practice example at the CPS’s Diversity Awards.
INLAND REVENUE
2.1 The case study presented in this chapter focuses on initiatives undertaken by the Bristol and North Somerset Inland Revenue Office to meet the needs of diverse Black and Minority Ethnic communities amongst their clients. These initiatives are instructive for the way in which the initiators identified and responded to their diverse clients’ needs, and how this process was managed. The particular initiatives examined here were developed and implemented by the Bristol Inland Revenue Office’s Business Support Team (BST). The Bristol BST is a small group, consisting of twelve Business Advisors, managed by the Business Service Team Manager and given strategic direction by the Area Services Director and the Area Customer Relations Manager.

The role and structure of the Inland Revenue

2.2 The Inland Revenue collects direct taxes and pays tax credits and child benefits in line with Government policies. In recent years there has been close co-operation between the Inland Revenue and the Department for Work and Pensions, particularly regarding the implementation of the new Tax Credit System. This has expanded the diversity of the customer base of the Inland Revenue considerably, to include people who previously had little to no contact with the Inland Revenue. If it is to succeed in its core purpose of ensuring that everyone understands and pays what they owe, and understands and receives what they are entitled to, the Inland Revenue must recognise and respond to the diversity of its customers.7

2.3 The Bristol Business Support Team developed the initiatives addressed in this case study. BSTs were established in 1999 to help Small and Medium Enterprises (SMEs) with their tax affairs. They are also part of the broader aim of promoting entrepreneurship. They conduct workshops, seminars and one-to-one sessions to help ensure that SMEs meet their tax obligations and receive tax credits to which they are entitled. Diversity of service delivery is part of this objective since the services they provide help individuals from communities that are less likely to start small businesses to set up and run their own firms.

2.4 The Bristol BST is supported not only by local area management, but also by regional and national management structures. The Inland Revenue is divided into seven regions of which Southern England is one. There is a system of area management, whereby Inland Revenue Southern England is divided into 14 areas, of which the Bristol and North Somerset area is one. The Inland Revenue Southern England region has responsibility for ensuring that business processes (such as movements, posts, customer relations, accounting, compliance and training) are uniform across the areas, and for spreading best practice in this area. The regional office is informed of local area business activities via monthly reports (on compliance, service delivery and corporate services) that are sent from the local offices to the regional office. Moreover, each region has a BST co-ordinator to oversee the activities of the BSTs within their region and who act as conduits between the area and national levels. The regional co-ordinators receive monthly reports from their area level BST managers. At the national level, the Service Delivery Stream identifies the overall service delivery strategy of the Inland Revenue and the place of the BSTs within this strategy. All BSTs report directly to the Service Delivery Stream, providing quantitative and qualitative information on area-level activities, including initiatives that involve diversity in service delivery. With this information, the Service Delivery Stream aims to identify good practices and the extent to which these are transferable to other locations.

Equality and diversity of service delivery

2.5 To meet the needs of all SMEs the Inland Revenue must identify and meet the needs of diverse communities. Of the 3.8 million or so businesses in the UK, ethnic minorities own about 7 per cent. This is not representative of society as a whole, where 9 per cent of the population is made up of ethnic minorities.8 If more individuals from ethnic minorities are to set up their own firms, they must understand the tax regulations. Local Inland Revenue offices, and in particular the local Business Support Teams, can contribute to increasing this knowledge.

2.6 The Inland Revenue has several mechanisms, structures and programmes in place to mainstream equality and diversity in service delivery. These efforts, co-ordinated at the national level, aim to enable regions and local areas to respond to local needs, without prescribing activities from the national level. Some of these co-ordinating efforts are outlined in Box G.
Mechanisms, structures and programmes to mainstream equality and diversity

Structures

- **The Diversity Advisory Group (DAG)** is a ‘moving group’ consisting of a rotation of staff. DAG meets quarterly over a two-hour lunch to discuss current issues at hand. Emerging good practices are included in the minutes and shared on the intranet.

- **A panel of Diversity Champions**, consisting of a Board member/Director from all business areas, works to provide the Revenue with guidance on diversity priorities. The panel consists of voluntary members, who usually rotate every three to four years or if they move to other jobs.

- **Regional Diversity Co-ordinators**, organise and facilitate local focus groups and collect examples of best practice using a format designed by the central team. These are used on both the central Intranet site and the Region’s Intranet site.

- **An Equality and Diversity network**, consisting of regional Equality and Diversity Officers (EDOs), acts as a communication channel from the regional to the national level. The network collects and shares examples of good local practice, which are then shared more widely via the intranet. This group meets approximately twice yearly at an event facilitated by the central team.

- **A centrally based, Business Through Diversity (BtD) team** provides a consultancy-type service to other parts of the organisation to help them deliver their diversity objectives. The BtD team provides tools to help with the ‘how to’ questions. The Schemes’ co-ordinator oversees implementation via a cross-cutting team of representatives from throughout the Revenue. The team meets regularly and develops products and tools for business use e.g., BtD developed a video and facilitator guide.

Mechanisms

- **Events** such as the ‘Diversity Awards’ and ‘Diversity Week’ allow good practice examples to be acknowledged and publicised. Over 200 examples of good practice (internal and external) have been shared through these initiatives. In each case, the benefits of the initiative to the individual, team and community at large are highlighted. Following a recent evaluation of the ‘Diversity Awards’, the Revenue is set to run another one. The evaluation found that the quality of the initiatives was high; the strategic goals - to draw out and share good practice - were met; and that participants viewed the event to be worthwhile.

- **The Revenue’s intranet site** contains accounts of good practice examples, such as the initiatives undertaken by Bristol’s Business Support Team.

- **There is also a virtual network** (facilitated electronically). Key information is forwarded from the centre via an e-service network. The central team also have a contact box for enquiries from the network as well as taking telephone calls for advice. This links all the diversity focus groups throughout the Revenue’s current and past DAG participants, the EDO network and the central team.

Programmes

- **There are various training programmes** that have a diversity focus. For example, during 2001/2002, all Inland Revenue’s 8,000 managers attended ‘Diversity Training’ by participating in workshops. The internal training programme also includes a number of diversity learning products that people can attend as part of their personal development plans. Other “one-off” initiatives have also taken place, e.g. culture awareness events. There are also other specific training courses on cultural awareness.

- **All staff participate** in a ‘Core Purpose’ programme, which is run by the Marketing and Communications Unit. The programme addresses the image and brand of the Revenue and is rolled out periodically in a modular format. Although the programme is not labelled as a diversity initiative, the topics addressed - such as relationships with customers - are integral to incorporating diversity principles into the core of the business.
The initiative: reaching out to minority Small and Medium Enterprises in Bristol

2.7 The Bristol and North Somerset Business Support Team (BST) has been recognised at the national level by the Inland Revenue for the outreach activities undertaken by the team in working with, and for, SMEs run by individuals from Black and Minority Ethnic communities. Since early 2003, a Bristol-based Business Advisor has been working to establish a local network of contacts with community leaders and representatives, and to co-ordinate a wide range of activities with ethnic minority businesses. At the 2003 Inland Revenue Diversity Day Awards, the Bristol and North Somerset area performed very well overall, winning two awards. The Prince of Wales also visited the Bristol office in December 2003 in recognition of the work it had done. The BST has a proactive approach to forging links with local ethnic business and community groups.

2.8 The BST carries out engagement activities with minority businesses and communities through workshops, seminars and ‘one to one’ sessions. These allow the BST to provide appropriate and practical assistance, giving staff members a better understanding of diverse clients’ tax-related needs. For example, where there are language barriers, clients can be assisted by the provision of translated material or one-to-one advice. Furthermore, outreach activities allow support to be taken to the minority communities, rather than expecting them to find support themselves. This is particularly important in cases where isolated communities are unaware of the services available to them, do not know how to access them, or are daunted by the prospect of having to initiate contact.

2.9 This case study is based on key informant interviews (Box H) and document reviews. The interviewees included representatives of the community groups involved in the outreach activities, and Inland Revenue staff at the local, regional and national levels. In the following sections we describe the links with the Sikh Resource Centre and the Bristol and Avon Chinese Women’s Group that formed the basis of these outreach initiatives. The objectives of these initiatives and how these objectives were achieved is then described.

BOX H

Key informant interviews - Inland Revenue

Community Groups (representing minority community)
- Director, Bristol and Avon Chinese Women’s Group.
- Project Co-ordinator, Sikh Resource Centre in Bristol

Bristol and Somerset Inland Revenue (local office, based in Bristol)
- Area Services Director
- Area Customer Relations Manager
- Four Business Advisors.

Southern England Inland Revenue (regional level)
- Director and ‘Diversity Champion of Champions’
- Assistant Director of Customer Services, Regional Consumer Champion and Manager of Regional Co-ordinator of BST.

Inland Revenue (national level)
- Head, Equality and Diversity Unit
- Small Businesses Champion, Service Delivery Stream
- Team Leader, Out of Office Activities, Service Delivery Stream.

2.10 Links were established with the Sikh community as part of a process of establishing a network of contacts with community leaders and representatives. The Sikh Resource Centre in Bristol (Box I) plays an important role in the Bristol Inland Revenue office’s contact with the local communities it serves. The Sikh Resource Centre does not restrict itself to providing services to Sikhs; for example, it also represents Muslims in the area.
2.11 At the initial meeting between staff of the Bristol Inland Revenue and the Sikh Resource Centre, the community needs to be addressed were identified. These consisted of:

- A lack of knowledge about the tax codes;
- A lack of knowledge about national insurance contributions; and
- Low levels of trust amongst the community of government bodies in general.

2.12 Following this meeting, the Sikh Resource Centre arranged for the BST to give a presentation to 200 Sikhs at the local Gurdwara (Sikh temple) on the services it offers. The Gurdwaras are appropriate venues because they are a focal point for the local community, allowing contact to be made with several generations of the community at the same time. Following this presentation, the BST arranged four outreach sessions at the Sikh Resource Centre, which the Centre publicised throughout the community. The outreach sessions consisted of presentations and individual consultations, where individuals could ask questions about their own cases. For instance, a preacher from one of the local Gurdwaras put his tax affairs in order after one of the outreach sessions. Preachers are classed as self-employed individuals.

2.13 The series of outreach activities with the local Sikh community have now been completed, as the Centre felt that the community and the Centre had received sufficient information and assistance from the BST. This allows community members to use the regular communication channels and information services. However, the Centre continues to be available as a point of contact between community members and the Inland Revenue.

**Links with the Bristol and Avon Chinese Women’s Group**

2.14 The link with the Chinese community was made when the Bristol and Avon Chinese Women’s Group requested a meeting with the BST in response to a leaflet that they received from the BST outlining the services the BST provides (Box J). The BST sent leaflets outlining the services it provides to all local voluntary organisations as part of its community engagement. The initial meeting took place in early 2003, to discuss the needs of the community and the ways in which the BST could help address these needs. From this meeting it emerged that the Chinese community felt excluded by language barriers; many individuals in the community did not have sufficient command of English to deal with the finer points of the taxation system.

2.15 Following the initial meeting, the BST undertook three workshops for members of the Chinese community. All three workshops were translated into Cantonese by the Chinese Women’s Group; the accompany handouts and workbooks were translated by Inland Revenue’s International Services. The first workshop, presented by two Business Advisors and attended by approximately 40 people from the Chinese community, focussed primarily on what services the BST could provide. The second workshop, presented by two Business Advisors and attended by approximately 30 people, focused on Self Assessment and filing tax returns. The third, attended by approximately 50 people, was held in conjunction with the AGM of the Chinese community organisation; it focused on the New Tax Credit system. Further BST workshops are planned with the local Chinese community, as part of a continuing outreach programme.
Objectives of the outreach activities

2.16 Through minority outreach activities, such as those undertaken with the Sikh and Chinese communities, the BST aims to gain an understanding of the factors that hinder or prevent voluntary compliance with tax obligations and the uptake of tax credits. The BST uses its outreach activities to identify differences in clients’ needs and to direct services towards meeting these needs.

2.17 The outreach activities aim to contribute to the achievement of the Inland Revenue’s organisational objectives by:

- Ensuring voluntary compliance and accurate tax returns. By gaining a better understanding of their tax responsibilities and how to fulfil these, individuals can assist the Revenue in processing claims efficiently, for example by completing tax returns accurately. Avoiding processing mistakes can save the Inland Revenue large amounts of resources in correcting errors.

- Enhancing the public image of the Revenue. Through interaction with communities, negative attitudes towards the Inland Revenue can be addressed. Gaining the confidence and trust of minority communities who are often suspicious of the Inland Revenue (and government departments in general) is essential to improving the Revenue’s public image.

- Supporting the Revenue’s core business purpose to make it as easy as possible for everyone to understand and comply with their obligations and receive their entitlements.

2.18 At a local office level, the outreach activities aim to:

- Establish strong links with local community groups. These links can be drawn upon when developing specific initiatives and means of responding to the needs of individuals from different cultural backgrounds.

- Establish strong links with other government and support agencies. As a result of the outreach activities undertaken by the BST, they are regarded as leaders in taking forward diversity and community initiatives that achieve genuine business and social benefits. For example, the Bristol office works together with DTI’s Business Links, Jobcentre Plus, and the South West Regional Development Agency, as part of the New Deal in the Community initiative.

- Support (i) the Inland Revenue Southern England regional business plan, “Working towards Educating Customers”; (ii) the Bristol and North Somerset area business plan, “Develop the Outward Facing Role of the Inland Revenue”; and (iii) the Bristol and North Somerset area’s “Joint Declaration on Racial Equality”.

- Contribute to the BST’s performance indicators, such as the number of contacts made by each of the business advisors each year. This is considerably higher than in other areas.

- Develop staff by broadening their awareness of the challenges faced in delivering services to a diverse customer base.

What have been the successes?

2.19 There are several strong indications that the outreach activities described are having an impact. Nevertheless, their impacts have not been specifically evaluated by the BST. Furthermore, the impacts of specific outreach activities are difficult to quantify in the short term and cannot be isolated with a high degree of certainty from those of other developments.
Measurable feedback

2.20 The BST seeks feedback from community groups on whether they are more satisfied with the relationship with Revenue as a result of the outreach activities. This feedback is received through formal evaluation following presentations and seminars and informal verbal feedback. Formal performance monitoring indicates that 99.7 per cent of BST clients are satisfied with the services they receive (Box K). A further signal of success is that community groups are now approaching the BST for support rather than the BST having to seek them out.

Mainstreaming minority groups

2.21 A real indication of the success of minority group outreach activities is when minority groups develop the resources that enable them to make use of mainstream services. The outreach activities with the Sikh community are viewed as an example of such success, where regular support sessions from the BST ceased after it had increased the confidence of the community to a level that enables them to use the regular contact channels for help and support. Members of the Chinese community are also reported to be making contact directly with the Inland Revenue.

Evidence of effects on individuals

2.22 Despite the lack of quantitative evaluation of outreach activities focusing on minority SMEs, anecdotal evidence from staff and community groups suggests that the impact of such targeted activities is considerable. The director of the Chinese Women's Group reports a substantial change in the approach of the Inland Revenue, where the Revenue is considered to be proving its commitment to diversity of service delivery ‘by actions’. The Chinese Women's Group reports that the contacts with the Revenue have had a considerable effect on the tax affairs of individual citizens in the Chinese community. Members of the Chinese community appear to have a better understanding of their tax affairs, and have filed more tax returns on time, as a result of the services offered by the BST.

BOX K

‘Happy sheets’

BSTs have targets against which they are evaluated regarding the number of people who attend their workshops and the satisfaction levels of participants. The collection of data on customer satisfaction (“happy sheets”) is currently being revised, so that they allow managers to differentiate between performance levels more effectively.

At present, these measures show very high levels of satisfaction. One of the reasons for this may be that the forms for obtaining these data are not anonymous.

In addition, data on the behavioural effects of BST contacts would be useful, as data on the effects of contact with BST advisors in terms of customers’ behaviour are not yet available at national level.

How successes were accomplished

2.23 Several factors account for the success of the BST in reaching out to minority SMEs in the Bristol and Somerset area.

Motivation and drive of individuals

2.24 In this case, the personal initiatives taken by individuals in the BST were critical in making this initiative work. This illustrates the importance of ensuring that the right people, with the right skills and motivations, are placed in key service delivery positions. To some extent, such individual activity is encouraged by the fact that community engagement activities are woven into the normal workload and job descriptions of Business Advisors.

Commitment and dedication of the team

2.25 To make a success of outreach activities, frontline staff are often called upon to work outside their normal hours. For example, many of the outreach workshops and seminars were scheduled on weekends or evenings to ensure maximum community involvement. This required staff to work flexible hours without extra remuneration. The commitment and dedication of the team ensured that enough Business Advisors were present to facilitate the activities.
Leadership from all levels

2.26 While the Bristol-based initiatives were formulated in a bottom-up manner, leadership at many levels has been important. When he was head of the Inland Revenue, Sir Nicholas Montagu set out a broad agenda that recognised the necessity of changing the public’s - and particular ethnic communities’ - perception of the Inland Revenue. His leadership was widely acknowledged as being highly supportive. Full support is also given by the Director of Southern England. Within the Bristol Area, leadership is provided by the Area Services Director and the Area Customer Relations Manager who steer local activities. The style of local leadership is one that empowers staff to take initiative, rather than handing down detailed instructions: described as a style that “does not stop people from doing things”.

Main barriers and how they were overcome

2.27 In the process of undertaking outreach activities, the BST faced and learnt to overcome some generic barriers that arise in this type of work.

Overcoming negative perceptions through partnerships with intermediary organisations

2.28 In making contact with members of the community, one of the initial barriers that had to be overcome was the negative perceptions they held of the Inland Revenue. Working in partnership with organised community groups, such as the Sikh Resource Centre and the Chinese Women’s Group has been especially rewarding for the BST because these organisations are already trusted by the communities they serve. Using intermediary organisation allows the BST to access previously isolated groups and individuals more easily.

Finding finances to meet additional costs

2.29 Such activities are subject to the need to balance the use of resources across all of the Department’s activities. A ‘resource model’ is used to allocate regional resources to local areas. The model takes into account the customer type in each area (in terms of the complexity of the tax work), but does not specifically take account of customer profile (cultural issues) in each area. One of the barriers that needed to be overcome in developing links with the Chinese community was to have promotional leaflets translated into Cantonese. The Bristol office funded production of the leaflets, with the translation provided by the Inland Revenue’s International Services Office.

Dealing with cultural unknowns

2.30 The area office’s staff receive limited formal guidance on dealing with diverse religions and cultures. Before initiating contact with community groups, the Business Advisor concerned had little involvement with minority communities and was “terrified” that she “might commit a religious or cultural faux pas”. As a source of guidance, she first referred to the publications issued by the Inland Revenue and then contacted a Religious Studies Teacher who talked her through various religious protocols.

2.31 Currently, the diversity of Business Advisors at Bristol does not reflect the diversity of the community. It is acknowledged that diversity among staff can be an aid in meeting different needs in the client base by providing knowledge of different cultures. However, Business Advisors believe it is not necessary for staff to share exactly the same characteristics as their clients for them to deliver services effectively; a willingness to engage with all customers is the key factor.
Looking to the future

2.32 Not all Inland Revenue staff view outreach as the answer to meeting diverse communities’ needs. Some of the staff in the Bristol office believe that the Revenue should not have to differentiate the way it delivers services to the public. Instead, all clients should be able to use mainstream forms of access. In the short-run, however, differentiation is necessary to take into account different cultures and provide positive help to communities that need it. Outreach activities that promote services to minority communities present an obvious way to bring minority community members into the system. Looking to the future, there are several factors that might influence how the Revenue works to mainstream minority communities.

Sharing good practice

2.33 For lessons from diversity in service delivery to have a greater impact, a variety of communication channels need to be used. These range from national, regional and local meetings, newsletters and electronic formats, and specially designed locally-focused events, such as ‘diversity awards’, that provide platforms for sharing good practices. Diversity awards bring national recognition to local initiatives. The awards are seen as important to motivating staff and managers.

Managing organisational change

2.34 The planned merger with HM Customs and Excise may have implications for the way services are delivered. Good practices from both organisations must be considered before moving forward jointly. As with any organisational changes, the merger could bring about an initial sense of uncertainty until staff and the public adjust to the new system. However, the Treasury’s Review of the Revenue Departments, published 17 March 2004, which recommended the merger, stresses improvement to customer service as a key driver for the creation of the new department.

Responding to calls for cost effectiveness

2.35 Following the Review of the Revenue Departments and the Gershon Review, there is an increased emphasis on finding efficiency savings, which can then be rechannelled to frontline services. The Inland Revenue is reflecting this in its delivery strategies, but is not withdrawing from one-to-one and face-to-face contact where they believe this approach will best meet customer needs.

Building evaluation into the design of initiatives

2.36 Although local offices such as Bristol find it difficult to quantify the benefits of outreach activities, the message from the regional and national level is clear: cost-effectiveness, although sometimes difficult to quantify, can and should be demonstrated. In October 2003, the Inland Revenue published an “Out of Office Service Delivery Guide”, which provides local area managers with guidance, including advice on how to build evaluation into the design of initiatives and how to implement it. In recognising that a system for monitoring and evaluating activities is a critical part of being able to deliver value for money services, area managers have agreed to use this guide in the development of initiatives in the future.

Promoting an ‘enabling’ agenda

2.37 The Inland Revenue recognises the need to be a move away from organisationally-prescribed service delivery to a customer-led delivery of services. While areas are encouraged from a regional level to expand their impact on the wider community, specific outreach activities and local initiatives are decentralised to allow local areas to respond to the needs of the local community. This means that there is a substantial amount of variation between areas, which is likely to continue. This is inevitable, given the large differences between areas in terms of the diverse composition of their client bases.
Background

3.1 The Women’s Study Group, supported by the Joseph Chamberlain Sixth Form College, and hosted by Bordesley Green Girls’ School in Birmingham, is an example of diversity in the delivery of adult learning services. The Women’s Study Group is an ongoing initiative to meet the educational needs of women from Black and Minority Ethnic communities in the local area, particularly women from Pakistan and Bangladesh. The positive impact of the Women’s Study Group is recognised by the College staff and students. The contributions it makes to meeting the needs of the diverse community are due to efforts by the education providers in co-operation with the community, and the organisations that support and monitor the activities of the education providers. The Learning and Skills Council (LSC) supports such diversity in service delivery through its planning and funding of education and training for post-16 year olds outside higher education in England.

3.2 The main sources of information used for this case study consist of interviews with students, teachers and policymakers. The interviews were held at different levels, from the classroom to government department level. We interviewed the Principal and Assistant Principal of Joseph Chamberlain College, and held focus groups with students and staff. Within the LSC, we interviewed the Regional Director of the Birmingham and Solihull LSC, and staff of the national LSC, including the National Director of the Learning Group, the Director of Equality and Diversity, and the Policy Manager for Equality and Diversity. At the Department for Education and Skills, the Head of the Post-16 Equal Opportunities Policy Team was interviewed.

The Women’s Study Group - objectives and successes

3.3 The Women’s Study Group aims to provide learning opportunities for local women whose family circumstances prevent them from travelling far from home, or from making a commitment to attend courses regularly or punctually. The lessons provided in the Group focus on strengthening students’ self-confidence and on providing information and developing skills of practical use. Students also have the opportunity to take nationally recognised examinations in Literacy, Numeracy, Information and Communication Technologies and Urdu. The Group also offers other classes, such as dressmaking. This initiative began in Bordesley Green Girls’ School in the summer of 1995 as the “Mothers’ Group”. It aimed to improve the literacy of pupils’ mothers to support family learning. After a promising pilot, funding and tutors for the class were secured through a partnership with Joseph Chamberlain College. Bordesley Green’s designation as a Business and Enterprise School has promoted further expansion of the project.

3.4 Joseph Chamberlain Sixth Form College’s main task is to provide learning opportunities for 16 to 19 year olds. The College is located in one of the country’s most disadvantaged neighbourhoods, with high levels of unemployment and low levels of formal education. Many of the students’ parents did not receive secondary education, and a high percentage of students are from ethnic minority backgrounds. The College views support for adult women as an important part of its activities.
3.5 The impact of the Women’s Study Group is evident in the effects it has had on its students and their achievements, and development of the Group as a community asset. Signals of success can be assessed against the five criteria set out below:

- Sustainability. The Group has been active since 1995 and its enrolment has grown to 40 women each year;
- Academic achievement. The students often make substantial progress in terms of language proficiency and literacy. Of the 40 women enrolled in the period September 2002 to April 2003, 32 took national examinations in spoken and written English, Numeracy and ICT;
- Students’ career development after attending the Women’s Study Group. The Group’s tutor reports that after attending for around two years, many students go on to further training or employment;
- Personal development and support. The Group has benefited women suffering from stress and depression, as it provides a safe, positive environment outside the home; and
- Use of the Group as a point of contact with the community. The Group is recognised as an important link with the women’s ethnic minority communities and is used as a forum to disseminate information. For example, the Group has been used to trial school documents aimed at parents.

Many of our interviewees emphasised that while some of these signals of success are of great importance, they are difficult to measure and quantify.

Important factors in achieving successes

3.6 The achievements of the Women’s Study Group are made possible by a number of factors, ranging from front line engagement with the community to identify students’ needs, the consistency between this initiative and other activities undertaken by the College, and support from the LSC and the broader policy framework within which the education providers operate.

Community engagement

3.7 A history of developing close contact with the community and listening to community members needs is undoubtedly one of the critical success factors. This is evident in the activities of Joseph Chamberlain College and Bordesley Green Girls’ School in publicising their activities, and their decisions on the content of courses. Classes are advertised through word of mouth, a newsletter and contacts at the local mosque. Links with prospective adult learners are often provided by their children who study at the College or School. If requests for particular courses are voiced by the community, these are incorporated into its development plan, on the basis of which funding is raised. The teaching staff involved in the Women’s Study Group estimate that 90 per cent of ideas for course content are generated by students themselves.

3.8 Listening to students and prospective students helps teaching staff to identify specific needs. In addition to course content, these needs also refer to the organisation of the courses. For example, there is a crèche facility for students with children, support is available for students in their native languages, and class times are tailored to meet the women’s child care and other domestic responsibilities. Late start / early finish times have been found to be most appropriate for women enrolled in classes in English for Speakers of Other Languages. Meeting these needs requires the education providers to adopt a far more accommodating and flexible approach than usual.

Learning from experience

3.9 The Women’s Study Group is not an isolated initiative. On the contrary, it complements many other activities and initiatives undertaken by the providers. Experience of these initiatives helps build expertise in meeting diverse students’ needs. For example, the Women into Self Employment (WISE) initiative is an EU sponsored initiative of which Bordesley Green Girls’ School is a partner. WISE helps women in the local community move into self-employment in childminding, dressmaking and retail, by providing them with the skills required to write a business plan and manage small business affairs. Joseph Chamberlain College also funds courses at the Bangladeshi Women’s Employment Resource Centre. The Centre provides learning opportunities to Bangladeshi and other Black and Minority Ethnic women in the local community. Moreover, in its mainstream activities, the staff of Joseph Chamberlain College are well aware of the need to be sensitive to the needs of diverse groups. Female students’ families often expect them to focus on the home.
To make students aware of other opportunities available to them, former students, whose photos and short biographies are displayed throughout the College, function as role models. Such initiatives provide teachers with the experience required to teach classes composed of students who are diverse in terms of age, previous education and family circumstances.

Open lines of communication

3.10 Experience with related initiatives is of little help if this is not shared among teachers and school administrators. Joseph Chamberlain College reports that its staff are organised in a fairly flat structure, and that teachers are involved in all aspects of College life. Co-operation among staff is supported by personal ties made possible by the College's manageable size. Morale is also fostered by high quality training and paid training time for staff.

Support from the Learning and Skills Council and the Department for Education and Skills

3.11 The education providers believe that they have a good relationship with the local Birmingham and Solihull LSC, to which they report. The Principal of Joseph Chamberlain College explained that the LSC not only monitors the College's activities closely, but also facilitates them. LSC does so by recognising the College's achievements and by being open and flexible with the College. For example, in the event of unexpected developments that affect the College's performance, the LSC is prepared to listen to the College's explanation and to consider renegotiation of the College's contract.

3.12 LSC staff also support education providers in data management. The College draws together data on its sixth form students and adult learners three times a year in individual learner records. These data are the basis upon which performance is assessed. In recent years, the LSC has improved considerably the quality of information systems available to planners. Previously, further education colleges, work based schemes, sixth form colleges and adult and continuing education schemes maintained their own data collection procedures. There is now a common format for all education and training providers consisting of individualised learner and staff records.

3.13 Objectives are used to target activities, but not to micro-manage. Monitoring of the impact of equality and diversity work undertaken by local LSCs and education and training providers has developed within the framework for Equality and Diversity Impact Measures (EDIMs). 9 2003-04 is the first full academic year in which EDIMs have been in place. These are objectives referring to particular equality issues of relevance to the geographical areas for which they are set. The 47 local LSCs in England set their own EDIMs, on the basis of local education, demographic, and socio-economic data. The above-mentioned improvements in the information infrastructure were important in making EDIMs possible. Local LSCs and education and training providers, including further education colleges, are the main actors involved in proposing EDIMs for their area; EDIMs are then reviewed and approved by the local advisory committee. This is an example of the partnership approach adopted by the national LSC in fulfilling its statutory duty to promote equality of opportunity in the delivery of its services. EDIMs are not designed to penalise local LSCs or providers, but rather to get them to challenge themselves, and to identify areas for improvement in meeting the needs of diverse client groups. The national LSC provides guidance on the formulation of EDIMs that states, for example, that EDIMs must be both challenging and achievable. The EDIMs of the Birmingham and Solihull LSC consist of some 25 EDIMs, including a 5 per cent increase in female participation and a 9 per cent increase in participation of people of ethnic minority origin in Work Based Learning. Others aim to close retention and achievement gaps between different groups of learners.

3.14 Diversity in the delivery of learning opportunities is an important part of the plans formulated by the Birmingham and Solihull LSC for the area's future education, learning and skills needs. These plans are based on careful analyses of economic and demographic trends relevant to each of the area’s main economic sectors. Recent plans have considered the impact of economic restructuring, defined by the shrinking manufacturing base that nevertheless remains an important part of the economy. Demographic change has also been identified as a development that has substantial impacts on employers. The LSCs plans identify the critical skills needs of the area and, by definition, have implications for the training needs of diverse communities. The Regional Director of the Birmingham and Solihull LSC emphasises the importance of helping employers understand the changing skills needs and characteristics of their workforces. For the education and learning opportunities of diverse communities to have a positive impact, employers must also be prepared to respond to diverse needs in their workforces. An important part of LSC's role is to facilitate the matching of supply and demand in the area's labour market.

3.15 The Department for Education and Skills sets the overall parameters within which the LSC promotes equality and diversity. Within the DfES, the Post-16 Equal Opportunities Policy Team plays an important role in ensuring that equality and diversity issues are considered in all aspects of post-16 education and learning, including adult learning. Issues relating to equality and diversity are integral parts of the main strategies that guide government policy in this area, Success for All and the Skills Strategy. For example, the Skills Strategy considers the impact of training on different groups. It includes the introduction of the entitlement for all adults without a good foundation of employability skills to receive the education required to achieve level two qualifications. The DfES also communicates with and influences the LSC through regular contacts, its yearly grant letter and its response to the LSC’s annual equality and diversity report.

Main challenges

3.16 Winning the trust of the local community was cited as one of the main challenges that must be overcome by initiatives such as the Women’s Study Group if they are to be successful. The slow build up of trust and respect for the tutor has been crucial to the success of the Group. This has helped to break down barriers, such as the initial reluctance of students’ families to allow them to participate in class excursions. Trust and support is required not only from prospective students, but also of the wider communities of which they are part. This can be developed over time by visiting local community centres regularly and responding to the needs of community members. In addition, for the Women's Study Group it has been important to consider the interests of the women’s families, since their attendance often depends on family approval. This has had implications for the timing of classes, and attendance policy, so that the women could combine participation with other duties.

3.17 Another main challenge faced when implementing such initiatives was summarised by the LSC’s Director of Equality and Diversity, as the need to find a balance between demands for accountability and the need for flexibility when reaching out to diverse groups. The demand for accountability means that funding for the provision of courses is often tied to qualifications. However, when designing curricula and learning opportunities that encourage diverse groups to take advantage of them, courses that lead to qualifications are not always the most appropriate option. Not all students see the need for qualifications, and the possibility of failure can be daunting to some, particularly if they have not enjoyed formal education in the past. There is no easy solution to finding the optimal balance between accountability and flexibility. However, it was suggested that those charged with monitoring should have trust in the education providers they hold accountable. This does not mean being soft on monitoring; it does mean taking a nuanced approach to supervision: measuring and quantifying rigorously when appropriate, and taking a broader view when the situation calls for it. In the case of the Women’s Study Group, the LSC supports these classes as a form of lifelong learning and family learning, recognising the value of reaching women who would otherwise not participate.

Next steps

3.18 Given the Women’s Study Group’s past success, and the support it receives from the community, teachers, learning providers and local LSC, it is likely to continue in its present form in the foreseeable future. The Joseph Chamberlain College and Bordesley Green Girls’ School recognise the importance of continuing to respond to the needs of the communities they serve. New challenges have emerged in recent years due to the arrival of new groups; for example, a Somali community. Identifying and meeting their needs requires that the same process be followed of engaging with the community and identifying and using the relevant lessons from other initiatives.

3.19 With regard to Equality and Diversity Impact Measures, the challenge for the future is to keep the framework under review and to develop these so that they can be used to monitor progress on an ongoing basis. Part of this challenge involves improving the data used to measure progress on EDIMs. While great progress has been made in improving data collection procedures, these improvements have also made certain gaps in the data visible. In particular, improvements are needed in the completeness of data on disability and ethnicity. To achieve this, providers have to be convinced of the importance of collecting, registering and using this information to monitor the impact of their initiatives.

3.20 The LSC is also active in the broader context of helping other actors recognise the roles they have to play in tackling issues of equality and diversity. For example, the LSC works closely with the Equal Opportunities Commission, and acknowledges its concerns as to continued occupational segregation (the concentration of women and men in different kinds of job), gender imbalances in the workforce, and inequality in Modern Apprenticeships. In May 2003, the Equal Opportunities Commission began an investigation into these issues (Plugging Britain’s Skills Gaps, interim report published in May 2004)\(^\text{11}\), as part of which it drew on case studies from local LSCs, as well as focus groups of employers and employees. The LSC has responded to the EOC report with a series of actions to be taken forward as part of its Programme Board overseen by a Ministerial Steering Group.

3.21 At the local level, Birmingham and Solihull LSC is engaged in strategic partnerships with employers, helping them address their staff diversity. Furthermore, in large development projects, such as the Bullring shopping centre and Birmingham University Hospital, the local LSC co-ordinates the activities of job centres, colleges, work based learning providers and private companies, so that these projects benefit the areas with the highest levels of unemployment. Such efforts ensure that the effects of small scale initiatives of learning providers, such as the Women’s Study Group, are consistent with and reinforced by developments elsewhere.

NATIONAL GALLERY

“The Archers” by Sir Henry Raeburn, © the National Gallery, London
4.1 The National Gallery houses the national collection of Western European painting from the 13th to 19th centuries. Its aims are to care for, and enhance, the collection for the education and enjoyment of as wide a public as possible, both at the Gallery and beyond. The Gallery is open 360 days a year, and admission is free.

4.2 Art Through Words (ATW) is a four-year-old programme designed to make the collection of the National Gallery accessible to blind and partially-sighted people. In monthly sessions, selected paintings are explored through description, interpretation and discussion. Sessions last one and a half hours and typically attract 15-20 participants. As such, ATW is one part of the National Gallery’s efforts to make the art it houses accessible for disabled visitors.

4.3 ATW sessions are held in a conference room, where staff and students sit around a large table. Regardless of their visual abilities, all participants at ATW sessions are first issued with a large scale colour photocopy of the painting under discussion, as well as photocopies of details of the painting. Visitors with some sight use optical devices to assist them in exploring this material. At the beginning of the session, the describer introduces the painting, including its artist, and the historical context. This introduction is followed by a detailed description, which focuses not only on objects, colours and composition, but also the atmosphere of the work and the describer’s own response to it.

4.4 The choice of paintings for ATW is determined by the National Gallery’s team of five describers, with the aim of combining individual interests with a balanced programme that allows participants to become acquainted with the wealth of the collection. Depending on the nature of the work, the describers adopt different approaches, such as verbal description or encouraging participants to imitate the postures taken by figures in the paintings. In some cases, the verbal description of the atmosphere is complemented by purpose-designed soundscapes, such as the splashing of oars in water for a river boating scene. Painting utensils are also used during the sessions, such as modern paint brushes, to help illustrate developments in techniques and textures.

4.5 Participants are encouraged to contribute their knowledge, thoughts and emotional response in the following discussion of the painting. The visit concludes with a visit to the Gallery, to the place where the original painting is displayed.

4.6 ATW sessions are free of charge. Information on aspects of paintings that may be offensive to some participants, for example nudity and religious content, is available in advance. To facilitate the preparation of materials, visitors are encouraged to inform the Gallery of their intention to attend, but this is not a condition for participation.

4.7 This case study is based on interviews with the National Gallery’s Head of Education, the Adult Learning and Access Officer, and the Director of Administration, as well as an interview with the Royal National Institute of the Blind’s (RNIB) Arts and Heritage Office. These interviews were complemented by attendance of an ATW session. Contextual information on the provision of services for visually impaired visitors at museums, galleries and heritage sites was obtained from the Talking Images Guide and Research report (2003).\textsuperscript{12}

The objective of the initiative

4.8 In the early 1990s, the Gallery’s Education Department produced A Sense of Art, an audio guide for blind and partially sighted visitors. Along with a walkman containing the audio guide tape, visitors were issued with a large print book and a raised line diagram book, which traced the main outlines of the pictures discussed by the guide. However, the Education Department grew increasingly aware of drawbacks in this provision. The materials were awkward to carry, especially for visitors using walking aids, and some of the directions provided on the tape were no longer valid because paintings had been moved. Moreover, regular visitors found the basic outlines of the raised line diagrams an unsatisfactory way of exploring art. Many visitors expressed a preference for information delivered through human contact.

4.9 Having identified the shortcomings of the existing provision, and the preferences of the visitors concerned, the Education Department set out to create a new form of access that would be better able to convey the content and spirit of the Gallery’s paintings, and that would take into account the visitors’ preference for access facilitated by human interaction. For this, the Department sought the advice of the Arts and Heritage staff at RNIB, who have in-depth knowledge of the needs of visually impaired people, and of art.

4.10 As custodian of a paintings-only collection, the Gallery was precluded from making its artworks accessible via a touching collection, an approach highly popular with other galleries and museums. However, for the Department, this apparent limitation became a positive challenge: to venture beyond the idea that visually impaired people could explore art through their sense of touch only.

4.11 ATW was devised as an access route based on intellectual, rather than physical experience. It aims to help visitors to engage directly with paintings, rather than via translation techniques such as simplified raised line images. Developed in collaboration with teachers and clients at the RNIB, it was the first programme in any gallery to be based on pure verbal description.

4.12 As well as taking into account the nature of the collection, Gallery staff believe this responds better to the letter of the Disability Discrimination Act. The participants are not treated as ‘handicapped’, but as a group from which the educational staff can learn. Essentially, disabled customers are treated in the same way as other customers who receive guidance through verbal explanation, and whose interactive, dynamic engagement is one of the Gallery’s key objectives.

Signal successes

4.13 With around 15-20 participants at each session, ATW draws the largest audience of visitors with sight problems in any gallery in the UK. The programme has proved highly successful at engaging a broad age range of visitors, from late teens to over eighty, with various levels of visual handicap. Sessions are followed by occasional visitors as well as a contingent of dedicated regulars.

4.14 Learning facilitated by ATW is not necessarily limited to the group present at the sessions. Some participants report displaying the paintings discussed in their home and passing on their knowledge to other family members, such as grandchildren. We also observed participants recording the sessions to listen to again later at home. The Art Through Words programme is particularly important as there is a lack of other sources of information on art history, such as spoken books, for visually impaired people.

4.15 Far from being a one-sided initiative, the programme has proved a rich source of instruction and satisfaction for educational staff. ATW participants are amongst the liveliest, most enthusiastic people educational staff have encountered. The programme has taught the staff much about how to approach their practice as teachers, for example in terms of awareness of how a work is described and how to structure descriptions.

“...But nobody sees with their eyes, everybody sees with their brain.”

ATW participant
4.16 As a pioneer in verbal description sessions, the Gallery has inspired similar provision in a number of other galleries and museums, some of which now use descriptions alongside touch tour materials. The Gallery’s educational staff has striven to disseminate knowledge of the programme amongst its touring exhibition partners, as well as other venues. A sample session of ATW was re-created at the 2003 Talking Images conference, which discussed ways of overcoming barriers faced by visitors with sight problems in museums, galleries and heritage sites.

Key success factors

4.17 The implementation and ongoing support of ATW and the National Gallery’s other access initiatives has been supported by the following elements and structures:

- **Embedding:** According to the RNIB’s Arts and Heritage Office, a key factor in successful service delivery is an access policy that involves all staff - a holistic approach balanced by well-defined monitoring responsibility. The National Gallery answers to both of these needs through its internal Access Group. Chaired by the Head of Education, and reporting to the Gallery’s management group, the Access Group brings together representatives from a number of departments. In addition, the group has designated contact links in all departments within the Gallery, deliberately including those that have no direct contact with customers. This embedded structure has greatly facilitated access work, as the group is linked with everything that the Gallery does, and its objectives are central to the organisation.

- **Internal co-operation:** Beyond the internal network provided by the access group, individual initiatives have greatly benefited from close collaborations amongst departments. The Media Department is an important partner of the Education Department, for example in producing custom-made soundscapes for ATW sessions. It also designs web-based information for disabled visitors, as the website is an important means of making the Gallery more accessible to disabled visitors. The Gallery’s web site was the first to earn the RNIB “See it Right” logo.

- **Customer involvement:** ATW was conceived by the Education Departments in dialogue with teachers and clients at the RNIB. The RNIB’s Arts and Heritage Office confirms that the most successful initiatives are those that involve customers all the way through, from the first stages of inception through to ongoing monitoring. Educational staff regularly collect feedback from participants, and have fine-tuned the programme accordingly. For example, it was found that the fabrics which were originally used in some sessions to suggest textures did little to enhance the participants’ experience of the descriptions. Soundscapes, on the other hand, have been well received, and have been used accordingly.

- **Staff experience and enthusiasm:** Skilful and dedicated staff have been the backbone of ATW’s creation and success. Some of the freelance members of the team were selected because they were already interested in the area and had worked on other aspects of diverse provision, for example children with special education needs. All staff on the team have participated in training sessions with the RNIB.

- **Dissemination among customers:** The Education Department works vigorously to spread knowledge about ATW, and attract new participants among the blind and partially sighted. To meet this objective, the Department liaises with the local community and representative groups, and continues to seek out fresh communication channels, such as newsletters, ceefax pages and events.
Barriers overcome

4.18 The Education Department believes that in the creation of the Access Group, and the access initiatives, the Gallery has managed to avoid the following major barriers to successful diversity in service delivery:

- Marginalisation: Due to the embedding of the Access Group within the Gallery, access initiatives are at the centre of the Gallery’s activities. As a result, the Group has never had to struggle against organisational barriers, the belief that something was not worth doing, or lack of support amongst staff.

- Disruption: The embedded approach has also ensured the sustainability of initiatives. The Gallery is aware of the danger that very good work developed and driven by individuals often comes to an end when that person leaves the organisation, leading to disruption and subsequent reinvention of the wheel. This danger is particularly serious in the arts and heritage sector, where staff turnover is high.

- ‘Drowning’: The Gallery values being of a small enough size for its staff to be able to communicate and network with relative ease, and retain an overview of the organisation’s activities as a whole.

- Lack of resources: Although two lecturers are required for each ATW session, the programme takes up a relatively modest amount of resources, and is considered excellent value. Art through Words is supported by ‘London’s Museums, Archives and Libraries’.

Next steps

4.19 ATW sessions will continue at the Gallery, as well as the activities that have underpinned its success to date: development of the initiative through feedback from the participants, training, and varied outreach work to attract new participants.

4.20 The Education Department also plans to continue to disseminate information about the programme to other organisations in the arts and heritage sector. So far, this dissemination has taken place through conferences, staff from other venues visiting the Gallery to observe ATW sessions, and Gallery staff giving training sessions at a touring partner gallery. As an added benefit, it is hoped that the wider advertisement of its innovative work will also help to dispel the lingering perception of the Gallery as a conservative, ‘elitist’ institution.

4.21 Despite the popularity of the ATW sessions, the Gallery recognises that for individual visitors who visit the Gallery outside lectures, the provision of an audio guide is still highly desirable. Resources permitting, the production of a new audio guide, which would benefit from the lessons learnt through ATW, is therefore a further aim for the future.
This annex presents the protocol used to structure the interviews and other information gathering methods of the case studies.

The case studies involved in-depth interviews along the vertical structure of the object of the case study, including the department level, the field office level, and the service provider level. In addition, interviews or focus groups or participant observations were held with service recipients for each case. Figure A.1 shows the protocol used to structure the interviews.

### A1 Protocol for Case Study Interviews

<table>
<thead>
<tr>
<th>i</th>
<th>Background on Initiative</th>
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<tbody>
<tr>
<td>1</td>
<td>What are the main aims of this initiative?</td>
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<td>2</td>
<td>Is there a business case for this initiative; if so, could you briefly explain?</td>
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<tr>
<th>ii</th>
<th>Roles and Responsibilities</th>
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<td>3</td>
<td>Could you give a brief description of your roles and responsibilities, with particular emphasis on how they relate to the initiative?</td>
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<tr>
<td></td>
<td>[Probe: main challenges fulfilling responsibilities, major stumbling blocks]</td>
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<th>iii</th>
<th>Leadership</th>
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<tr>
<td>4</td>
<td>Is there a champion for this initiative?</td>
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<td></td>
<td>If yes:</td>
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<td></td>
<td>What is the role of this champion in delivering the initiative from concept to practice?</td>
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<td></td>
<td>What do you consider to be the strengths, weaknesses and challenges of such a role?</td>
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<td>5</td>
<td>Are there other senior figures/authorities that you would associate with this initiative?</td>
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<td></td>
<td>If yes:</td>
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<tr>
<td></td>
<td>Who are they and what are their roles within the initiative?</td>
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<td></td>
<td>What do you consider to be the strengths and weaknesses of their involvement?</td>
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<th>iv</th>
<th>Client Involvement</th>
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<td>6</td>
<td>Was there any client involvement in the design and implementation of this initiative?</td>
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<td></td>
<td>If yes:</td>
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<tr>
<td></td>
<td>Who was involved, how were they involved, and what stages were they involved?</td>
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<tr>
<td></td>
<td>What are the barriers and facilitators to involving clients at these stages?</td>
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<td></td>
<td>What have been the benefits and drawbacks of involving clients?</td>
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<th>v</th>
<th>Involvement of Front Line Staff</th>
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<tbody>
<tr>
<td>7</td>
<td>Is client involvement an ongoing practice?</td>
</tr>
<tr>
<td></td>
<td>If yes, how is it managed?</td>
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</tbody>
</table>

| 8   | Are front-line staff involved in this initiative? |
|     | If yes: |
|     | At what stage of the initiative are they involved and how? |
|     | How has their involvement affected the success of the initiative? |
|     | What influences the involvement of front-line staff both positively and negatively? |
### Protocol for Case Study Interviews continued

#### vi Communication, Feedback and Vertical Relationships

9 Within the scope of this initiative, how does communication flow up and down the relevant links in the chain - from senior management all the way down to the clients, and back?

10 What influences effective communication, both positively and negatively?

11 What do you see as the ongoing communication challenges?

12 Do all levels of the organisation see this initiative in the same way?
   If no:
   What differences exist?
   How are they resolved?

#### vii Diversity Among Staff

13 Does the internal diversity of the workforce reflect the diversity of the target clients?
   If yes:
   Is this a deliberate policy?
   What impact, if any, does this have on the success of the initiative?

14 Is diversity, both internal and external, measured?
   If yes, please explain.

#### viii Resources

15 Would you describe delivering this initiative effectively as “resource intensive”?
   If yes:
   Is it more so than other services delivered to less targeted clients?
   What accounts for the extra resources needed [e.g., extra training, more staff]? 
   Could you provide an estimate of the extra resources required [in terms of cash, staff]?

16 Does the outcome merit the extra resource required?
   If no, why not?

#### ix Evaluation

17 Does information on client needs exist?
   If yes:
   How is this information gathered?
   How is it used?

18 Was this initiative evaluated during its implementation phase?
   If so, when, how and what did you learn?

19 Is the initiative evaluated on an ongoing basis?
   If yes:
   How, and how often?
   What are the benefits and drawbacks to ongoing evaluation?
   What helps and what impedes the evaluation process?

20 Has the initiative contributed to improved service delivery as reflected in departmental and agency Public Service Agreement targets and/or other business targets?
   If yes:
   Which targets have these initiatives contributed towards?
   What are the measurable contributions to service delivery targets?

21 Has this initiative benefited from a “joined-up government” approach?
   If yes, please explain.

#### x Learning

22 How is the experience about this initiative shared within and/or across the organisation, or to a broader audience?

23 What affects information sharing, both positively and negatively?

24 What are the ongoing challenges and how are you planning to address them?

25 What might have happened if efforts were not made in this area?

#### xi Looking to the future

26 How sustainable is this initiative in the long-run?

27 What are the ongoing challenges likely to be?

28 What, if anything, renders this initiative a useful model for others seeking to deliver services to a diverse population?

29 Do you have plans to expand this initiative?
   If yes, what are the barriers and facilitators to scaling up the initiative?

#### xii Are There Any Other Important Issues That We Should Be Aware Of?