

Lambeth equalities monitoring policy

November 2017

Contents

1. Policy statement	3
2. Introduction and purpose	4
3. Legislative requirements	5
4. Principles guiding equalities monitoring	6
Appendix A	
Standard equalities questions	9
Appendix B	
Equalities Monitoring Self-Assessment 2012-13	16
Appendix C	
Data Protection Act 1998	20

1. Policy statement

Lambeth recognises that effective equalities monitoring is essential practice. It is only when we understand the issues of different communities, when using or not using our services that we will be able to design and develop services which reflect the needs of all of our residents, staff and other stakeholders.

Monitoring service use, customer contact, complaints and satisfaction for the protected groups defined in legislation ensures that services are fair and identifies the needs of users and non-users alike.

In line with our commitment to equalities set out in our borough plan, and our duties under the Equality Act 2010, we are committed to collecting data for the nine protected characteristics (ethnicity¹, gender (including gender reassignment), disability, pregnancy and maternity, religion or belief, age and sexual orientation, marriage and civil partnerships), as well as social and economic grade. However, we recognise that this information may not be relevant or available to every service area. In order to balance this commitment with the need to be proportionate, we ask that service managers take responsibility for assessing to what extent equalities monitoring should be applied in their work including any consultation and research activity that may be needed to support service design.

Despite this emphasis on self-assessment, we would expect that very few areas, if any, would not need monitor according to **ethnicity**, **age**, and **disability** as standard.

When data is collected, we will ensure respondents understand why data is collected and how it will be used. Storage of sensitive data will need to be considered in advance to ensure confidentiality and data protection.

¹ The Equality Act 2010 refers to 'race' rather than ethnicity.

2. Introduction and scope

Lambeth Council is committed to operating fairly and equitably in both its employment practices and service delivery, going beyond legislative requirements to co-produce with and deliver excellent services to our customers.

Customers and employees sharing their personal information with us will be central to our transition to become a cooperative council. By collecting and analysing robust equalities data, we will be more able to work together with our communities to co-produce services and ensure involvement from across our diverse communities. Having robust equalities data is not only a legal obligation for the council to demonstrate that it **eliminates discrimination, promotes equality of opportunity and good community relations**, but the information is essential to the council making informed decisions about services. To effectively collect and use demographic data, we must embed equalities monitoring practices into our service design and delivery, employment procedures and performance frameworks.

The Equality Act 2010 extends the statutory duty, which previously only applied to ethnicity, disability and gender equality, to nine protected characteristics (ethnicity, gender and gender reassignment, disability, pregnancy and maternity, religion or belief, age, sexual orientation, and marriage and civil partnerships)². Lambeth Council has also pledged to monitor the impact of policy and decision making on disadvantaged residents through monitoring social and economic grade (SEG).

This policy clarifies requirements of equalities monitoring across the organisation and provides guiding principles for its application. The council encourages departments to collect equalities data which can be used to inform decisions about resource allocation and service changes. However, we recognise that improving services does not need customers to share all of their personal information with us. It is not within the scope of this document to detail the specific approaches which should be followed in implementing this guidance, as this will vary extensively according to the nature of the service delivered.

The council has well established processes in place to capture equalities information relating to job applicants and staff, which are not detailed in this policy. This information helps us with workforce planning and organisational development. Whilst reference is made in this policy to the importance of collecting equalities data for staff as well as service users the overall responsibility for this data collection rests with the Human Resources division so that one single approach taken across the council. Further guidance on these processes is available from the Human Resources.

This policy outlines:

- Legislative requirements
- Principles guiding equalities monitoring
- Guidance on what should be considered when deciding which protected groups to monitor
- Provision of standard questions to be used when equalities monitoring protected groups

Once adopted, this policy forms a commitment for each service to regularly assess which of the protected groups should be monitored, by the council or one of its contractors, and to put into place processes to ensure that relevant data is collected, stored securely and used to inform services planning. In line with Act requirements, equalities information held by the council will be published on an annual basis.

² These will be referred to as 'protected groups' in this document

3. Legislative requirements

The **Equality Act 2010** came into force on 6 April 2011. Part of the Act is the public sector Equality Duty this requires that the council:

- removes or minimises disadvantages experienced by people due to their protected characteristics
- takes steps to meet the needs of people from protected groups where these are different from the needs of other people
- encourages people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

By collecting and analysing service users' and employees' equalities information we can demonstrate that we are complying with these requirements. The Act covers nine protected characteristics, these are:

- age
- disability
- gender and gender reassignment
- pregnancy and maternity status
- marriage and civil partnership
- ethnicity
- religion or belief
- sexual orientation

Every person can identify with a combination of these characteristics; we all have an age, a disability status, a gender, our own beliefs and a sexual orientation. It is not the purpose of equalities monitoring to put people in boxes but to ensure that all groups of people with similar characteristics have their needs met. Lambeth Council, along with a number of other councils, has pledged to additionally assess the impact of policy and decision making on disadvantaged residents through monitoring social and economic grade (SEG).

The Act prohibits unfair treatment in the workplace, when providing goods, facilities and services, when exercising public functions, in the disposal and management of premises, in education and by associations (such as private clubs). The Act also applies to those organisations that are providing goods, facilities or services on behalf of the organisation, such as procured services or co-operatives and mutuals. It is the council's responsibility to ensure that these services are complying with legislation through the procurement process. Services will need to ensure that a contracted organisation is collecting and using equalities information on service use and employment in line with this policy.

Storage of equalities data collected must comply with the requirements of the **Data Protection Act 1998**, which requires that sensitive information or any data that identifies an individual, is stored in a secure manner, where access to the information is restricted to named officers in the service area. Further details about Lambeth Council's data protection policy can be found in Appendix C.

The **Gender Recognition Act 2004** states that, where someone holds a gender recognition certificate (GRC), they must be treated according to their acquired gender. In most circumstances, it is a criminal offence to disclose the fact that they have changed their sex, except in some specific forums. A person with a GRC may consent to disclosure of the information if they decide it is in their interests to do so. Such consent, however, must be explicit. It may not be assumed.

4. Principles guiding equalities monitoring

4.1 What is equalities monitoring?

Equalities monitoring is when service users, residents and staff choose to share their personal information according to the protected characteristics listed in the legislation. It is not a bureaucratic data gathering exercise but is a common sense approach to ensuring the council's services, functions and employment practices are equitable and appropriate to the needs of the whole community. Analysis of equalities data can:

- reveal under or over-use of a service by a particular community
- identify specific needs that are pertinent to a particular demographic group
- provide evidence that services are inclusive, or reveal that services are not accessible to all
- measure service effectiveness in meeting the needs of all its customers
- identify how a service should be changed or renewed
- provide a greater understanding about our communities and their experiences
- provide opportunity to shape services to meet the needs of the local community

4.2 What to monitor?

It may not be appropriate to monitor all functions and services provided by the organisation by all protected groups. However, it is important that the council is aware of who is and who isn't accessing services or those dissatisfied with a service. It is important to understand differences in opinion and access according to protected group for:

- access to frontline services and those targeted at vulnerable people
- those services where there is a local or national history of unequal impact
- customer complaints, satisfaction, comments and compliments
- delivering services based on judgement or entitlement
- services where there are nationally established equalities indicators
- consultations with residents, service users and non-users of services
- services that are used by seldom heard groups and where mobility of service users is high and therefore their needs are more difficult to identify.

In considering which of the nine protected groups, plus SEG, to collect data on, decisions should be based on knowledge (or lack of knowledge) of who are the recipients of the services delivered and whether there is potential for any of the groups to receive unequal services. **We would expect that very few areas, if any, would not need to ensure that service delivery is monitored according to ethnicity, age and disability as standard.** Further guidance on considering which groups to monitor can be found in Appendix B.

When conducting customer satisfaction surveys on a service or function, it is recommended that equalities monitoring is included in questionnaires. This can be the first step to identifying the demographic make-up of who uses the service and if there is any disparity in satisfaction rates between groups. The information would then be used to develop actions in order to address any issues.

4.3 When to monitor?

Monitoring should be built into existing processes, systems and customer contact points where possible, to avoid increasing the burden on customers or the service. The exact frequency of monitoring can vary according to function or service and may be:

- an ongoing and continuous process with regular review
- periodically (monthly, quarterly, annually, etc)
- when a user signs up to a service (e.g. when they sign up to a library)
- when a user interacts with a service (e.g. when they take a book out)
- when conducting customer satisfaction survey
- when a user is complaining or complimenting a service.

In order to help service managers determine when to collect service users' personal information a self-assessment form has been developed (Appendix B).

4.4 How to monitor?

The implementation of equalities monitoring requires careful preparation. The following key issues need to be addressed:

- justification for monitoring (or not) and how the data will be used
- the policy context
- which groups will be monitored relevant to the service area
- who, when, how and from whom will the information be collected
- how the data will be stored
- confidentiality of client's records/information
- how the data will be analysed and reported
- who is responsible for reporting the findings of equalities monitoring
- training for staff to enable them to answer questions or queries, including why this information is required

Methods typically used to collect data include self completion questionnaires or interviews carried out face to face, on the telephone or via online forms.

4.4.1 Assurances

The information shared as part of equalities monitoring is by nature sensitive and is given at the respondent's discretion. There are no penalties for not supplying this information and a customer must not feel pressurised into sharing their information. In order to encourage response and to reassure respondents, an explanation of why diversity information is being collected will be provided, including how the data will be used; that the information shared will be kept confidential and whether the collection process allows them anonymity. Respondents do not have to provide all of their information if they do not wish to. Standard text is included in Appendix A which can be adapted as appropriate.

4.4.2 How to ask

We should always explain to customers why we are asking for any equalities monitoring information, but how we do this will vary according to each circumstance. Some standard text is provided in Appendix A; for further guidance on how to ask equalities monitoring questions, please contact Lambeth's Customer Insight Manager or the equalities lead for your department.

Experience suggests that most customers will be happy to provide this information. Some will choose not to answer the questions. There will be some customers who may want to ask for more information and about exactly how the information will be used and stored – which we should be able to answer. Officers

need to understand why equalities monitoring is carried out so that they can answer queries from users. They should encourage respondents to share as much information as possible bearing in mind that response is optional. If a customer is unhappy at being asked for monitoring information, you should simply reiterate why the information is needed, that providing information is voluntary and then move on.

Standard questions for monitoring have been agreed by the council to encourage consistency and departments are to use these where possible (see Appendix A).

4.4.3 Storing and sharing the information

The Data Protection Act (1998) requires sensitive information to be stored in a secure manner, where access to the information is restricted to named officers in the service area. To maintain confidentiality of sensitive information, data should be stored in a secure place and separated from the service-specific information once it is recorded. Further details about the council's policy on data protection can be found in Appendix C.

Care must be taken when publishing or sharing personal information to ensure individuals are not identifiable. For example, publishing information on educational attainment in a school, where there is a single pupil in a year group from a particular diversity group. Published information should be reviewed to ensure that obvious identifiers are removed and the data presented so as to avoid particular individuals being distinguished. This may mean removing sections of the data from the data set.

4.5 Acting on the results

The purpose of equalities monitoring is to take action when it is revealed to be necessary. It is important that the data collected is regularly interrogated, and emerging issues identified. The outcomes of monitoring should be compared to any targets set and any baseline data. It will also need to form part of the service / business planning process and may often be the key evidence underpinning an equalities impact assessment.

4.6 Further information

Further guidance and assistance can be provided by emailing equalities@lambeth.gov.uk.

Appendix A

Standard equalities questions

Using suggested equalities monitoring questions

The following questions are suggested for your equalities monitoring processes. Where possible eg statutory surveys, we may suggest standardised Census 2011 questions and/or Office of National Statistics question are used in order that findings from Lambeth can be compared with other boroughs or nationally. Where no comparable Census questions are available, we suggest using the questions included in the Lambeth Residents Survey, as this provides borough norms which can be used as a point of comparison with findings from your service. If amendments to these questions are needed to improve business intelligence, **these should be made to allow aggregation back to the original question.**

The questions supplied are appropriate for use in a self-completion survey. Different wordings may be appropriate for other data collection methodologies (such as face-to-face or telephone interviews).

Introduction

The standard introductory text that is supplied below should be included to introduce questions and provide assurance on data protection.

About You

To make sure we are providing fair services to all of Lambeth's diverse communities, it is important that we ask you a few questions about yourself. You are under no obligation to provide the information requested, but it would help us greatly if you did. The information will be used to help us plan services that meet the needs of all its users (*please edit this sentence for what you propose to use the information for*). Your responses will be kept confidential and any information published will be made anonymous. No information that can identify you, your home or your household will be passed to any other organisations without asking you first.

Gender and gender identity³

What is your gender identity? (Tick one box only)

- Male
- Female)
- Other
- Non-Binary
- Prefer not to say

Age⁴

Which age group applies to you?

- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75-84
- 85+

³ Source (Proposed changes to Council Tax Support Survey (2017))

⁴ All categories can be expanded/ collapsed as preferred as long as start/ end age remains the same. 0-15 can be excluded if adult only survey. Source: Lambeth Residents Survey

Sexual orientation⁵

Which best describes your sexual orientation?

- I am heterosexual/straight
- I am gay or lesbian (homosexual)
- I am bisexual
- Other
- I do not wish to answer this question
- Don't know

Marital status⁶

What is your legal marital or same-sex civil partnership status?

- Never married and never registered a same-sex civil partnership
- Married
- Separated, but still legally married
- Divorced
- Widowed
- In a registered same-sex civil partnership
- Separated, but still legally in a same-sex civil partnership
- Formerly in a same-sex civil partnership which is now legally dissolved
- Surviving partner from a same-sex civil partnership

Pregnancy/ maternity⁷

Are you currently pregnant or on maternity leave?

- Yes
- No

Religion, faith or belief⁸

Which of these best describes your religion?

- Atheist
- Buddhist
- Christian
- Hindu
- Jewish
- Muslim
- Sikh
- Other – please specify
- No religion
- Prefer not to say/don't know

Disability⁹

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? *Please include problems related to old age*

- Yes, limited a lot
- Yes, limited a little
- No

5. Source:: Lambeth Residents Survey

6. Source:: Census 2011

7. Source:: Lambeth Residents Survey

8. Source:: Census 2011

9. Source:: Census 2011

Ethnic origin¹⁰

What is your ethnic group?

White

English / Welsh / Scottish / Northern Irish / British

Irish

Portuguese

Polish

Gypsy or Irish Traveller

Any other White background, write in

Mixed / multiple ethnic groups

White and Black Caribbean

White and Black African

White and Asian

Any other Mixed / multiple ethnic background, write in

Asian / Asian British

Indian

Pakistani

Bangladeshi

Chinese

Any other Asian background, write in

Black / African / Caribbean / Black British

Other African

Caribbean

Any other Black / African / Caribbean background, write in

Other ethnic group

Latin American

Arab

Any other ethnic group, write in

Language¹¹

What is your main language?

English

Portuguese

Yoruba

Polish

Spanish

French

Italian

Somalian

Twi

Other – please specify

¹⁰Source: Office of National Statistics 2015 *Harmonised Concepts and questions* and also aligns to Census 2011. Additional categories such as Latin American have been added to reflect specific needs identified in these Lambeth Communities. Further categories may be added to reflect service users provided it remains possible to aggregate to the original Census question.

¹¹Source: Lambeth Residents Survey

Socio-economic grade¹²

Which of these activities best describes what you are doing at present?

- Employee in full-time job (30 hours plus per week)
- Employee in part-time job (under 30 hours per week)
- Self employed full-time
- Self employed part-time
- On a government supported training programme (e.g. Modern Apprenticeship/ Training for Work)
- Full-time education at school, college or university
- Unemployed and available for work
- Permanently sick/disabled
- Wholly retired from work
- Looking after the home
- Doing something else – please specify
- Refused
- Don't know

Which of the following best describes how you occupy your home?¹³

- Owner occupier – Lambeth leaseholder
- Owner occupier - private
- Rented from Housing Association
- Renting from Lambeth Council (Lambeth Living, United Resident's Housing or TMO)
- Rent from private landlord
- Shared ownership
- A residential home
- Other

12. For a self completion survey, employment status and tenure are often used as a proxy for information on income, management responsibility and qualifications. Source: Lambeth Residents Survey

Current borough profiles

This section gives an indication of the prevalence of Lambeth residents in equalities categories. All statistics are from the 2011 Census, unless otherwise indicated.

Gender and gender identity What is your gender identity?	Census profile
Male	In 49% of Lambeth residents are male, and 51% are female. It has been estimated that there are 20 transgender people per 100,000 people in UK, which suggests roughly 50-60 people in Lambeth ¹² . Locally, of 24,800 Lambeth Living tenants, 28 (0.1%) are transgender ¹³ .
Female	
Other	
Non-binary	
Prefer not to say	

Age Which age group applies to you?	Census profile
18-24	10.7% of Lambeth residents are aged 18-24
25-34	26.4%
35-44	16.6%
45-54	12.1%
55-64	6.8%
65-74	4.2%
75-84	2.6%
85+	0.8%

Sexual orientation Which best describes your sexual orientation?	Census profile
I am heterosexual/straight	There is currently very limited data about sexual identity in the UK, but existing estimates suggest that nationally 5-7%, and in Lambeth 5-10% are from LGBT groups. In Lambeth's 2008 Staff Survey 7% of respondents identified themselves as non-heterosexual. (Pending data from 2011 Staff Survey)
I am gay or lesbian (homosexual)	
I am bisexual	
Other	
I do not wish to answer this question	
Don't know	

Marital status What is your legal marital or same-sex civil partnership status?	Census profile
Never married and never registered a same-sex civil partnership	46.5%
Married	23.4%
Separated (but still legally married or still legally in a same-sex civil partnership)	3.2%
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	6.1%
Widowed or surviving partner from a same-sex civil partnership	3.2%
In a registered same-sex civil partnership	2.6%

Pregnancy/ maternity Are you currently pregnant or on maternity leave?	Census profile
Yes /No	We currently have no robust evidence on the prevalence of women who are pregnant or on maternity leave. Historically, fertility rates can be expected to fluctuate.

¹² *Gender Variance in UK: Prevalence, Incidence, Growth and Geographic Distribution*, Gender Identity Research & Education Society, 2009.

¹³ Lambeth Living Tenancies and Diversity Digest

Religion, faith or belief Which of these best describes your religion?	Census profile
No religion	28.0% of Lambeth residents say they have no religion
Buddhist	1.0%
Christian	53.1%
Hindu	1.0%
Jewish	0.4%
Muslim	7.1%
Other religion	0.6%
Rastafarianism	
Religion not stated	8.7%
Sikh	0.1%

Disability Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? <i>Please include problems related to old age</i>	Census profile
Yes, limited a lot	6.1%
Yes, limited a little	6.6%
No, not limited	87.2%

Ethnic origin What is your ethnic group?	Census profile
White	57.1%
English /Welsh /Scottish /Northern Irish /British	39.0%
Irish	2.5%
Portuguese	2.3% (Country of birth)
Polish	2.3% (Country of birth)
Gypsy or Irish Traveller	0.1%
Any other White background, write in	15.5%
Mixed / multiple ethnic groups	7.6%
White and Black Caribbean	2.7%
White and Black African	1.4%
White and Asian	1.2%
Any other Mixed / multiple ethnic	2.3%
Asian / Asian British	6.8%
Indian	1.6%
Pakistani	1%
Bangladeshi	0.7%
Chinese	1.5%
Any other Asian background, write in	2%
Black / African / Caribbean / Black British	25.9%
Black African	0.8%% (Country of birth)
Other African	-
Caribbean	9.5%
Any other Black / African / Caribbean	4.8%
Other ethnic group	2.5%
Latin American	3.1% (Country of birth: Central America + South America)
Arab	0.6%
Any other ethnic group, write in	1.9%

Language What is your main language?	Census profile
English	79.7%
Portuguese	3.4%
Yoruba	2.6% of residents speak an African language. 3.7% of pupils in Lambeth schools speak Italian as a main language (2012 School Census)
Polish	2.2%
Spanish	2.5%
French	1.8%
Italian	3.4% of residents speak an EU European language other than English, Spanish, French or Polish. 0.9% of pupils in Lambeth schools speak Italian as a main language.
Somali	2.6% of residents speak an African language. 4.4% of pupils in Lambeth schools speak Somali as a main language (2012 School Census)
Twi	2.6% of residents speak an African language. 2.7% of pupils in Lambeth schools speak Akan/Twi-Fante as a main language (2012 School Census)
Other – please specify	

Socio-economic grade Which of these activities best describes what you are doing at present?	Census profile
Employee in full-time job (30 hours plus per week)	46.5%
Employee in part-time job (under 30 hours per week)	9.5%
Self employed full-time	1.6%
Self-employed part-time	0.4%
On a government supported training programme	-
Full-time education at school, college or university	3.8%
Unemployed and available for work	6.0%
Permanently sick/disabled	3.8%
Wholly retired from work	5.6%
Looking after the home	3.5%
Doing something else – please specify	3.3%

Tenure Which of the following best describes how you occupy your home?	Census profile
Owner occupier – Lambeth leaseholder	32.2% of residents are owner occupiers. There is no private/ council breakdown in the census data.
Owner occupier – private	
Rented from Housing Association	14.7%
Renting from Council	20.0%
Rent from private landlord	29.3%
Shared ownership	1.2%
A residential home	1.2% of Lambeth residents live in communal establishments.
Other	0.3%

Appendix B

Equalities Monitoring Self-Assessment template 2012-13

Background

Equalities monitoring is the process of gathering personal information about customers and employees so that we understand whether the services, functions and facilities we provide meet the needs of all users and potential users/ employees and potential employees.

The Equality Act 2010 extends the statutory duty to nine protected characteristics (ethnicity, gender and gender reassignment, disability, pregnancy and maternity, religion or belief, age, sexual orientation and marriage and civil partnerships). Lambeth Council has also pledged to monitor the impact of policy and decision making on disadvantaged residents through monitoring social and economic grade (SEG).

Lambeth Council's policy for equalities monitoring provides guidance to council departments on how to meet the obligations under the new Act. It clarifies the council's commitment to monitoring equalities to make sure we have sufficient information to assess the impact of service delivery across client groups and for those with protected characteristics. **It is recognised that information across all groups may not be relevant or practical to collect for every service area.** As a result, we ask that service managers assess to which of the protected groups their equalities monitoring processes or consultation and engagement should cover.

How to complete the self assessment

Completing the self-assessment template encourages consideration of the implications of the policy, issues with its application and action needed, so that the necessary data is available to inform service-level decision making.

It is expected that completion of the template will take no more than one hour per service area. The template covers the following areas:

- Description of current practice and the data held
- Assessment of which of the protected groups need to be monitored
- The method by which they will gather the information. **If, for business reasons, it is not possible to put in place the required processes immediately, managers are asked to identify reasonable timeframes for implementation.**

The information agreed as part of this self assessment is a commitment to action endorsed by SMT and DMTs and where relevant discussed with your consultation and engagement link officer. We recognise that resources within departments are affected by ongoing changes and ask that only activities which the service is committed to delivering are detailed. Review of delivery against these commitments will be built into the annual publication of equalities evidence that the council is required to submit under the requirements of the Equality Act 2010.

Section 1 – Current practice *In this section, please describe your current processes for equalities monitoring and the intelligence you already have. The information gathered in this section will inform your action plan (section 3), as any changes will need to align to existing processes.*

1. Name of service area or team assessed

2. What are the main functions of your service area or team?

3. Who are your customers and do they have any specific needs that should be considered? *(Pre-populate from existing EIAs if possible)*

4. If you already collect equalities monitoring data, what methods do you use to collect information and how is it used? *This section provides assurance for the processes already in place. Further monitoring should be aligned to existing processes if possible. Please provide details for each process already in place.*

<p>Method used e.g. monitoring forms, questionnaire, data capture as part of service interaction</p>	
<p>Where is the data stored? e.g. Excel, CRM, Respond, SX3 etc.</p>	
<p>How is the data used? e.g. performance reports, EIAs</p>	

Section 2 – Assessing which protected groups to monitor

This section asks you to consider for which groups there is potential for limited access to or quality of service. If monitoring is not relevant or practical, please provide justification

5. Considering your service functions and customers, for which groups is equalities monitoring necessary? Is there potential for any of these groups to have **restricted access, reduced quality or specific needs** from any of the services you provide?

If there is a possibility of exclusion or specific needs among any of these groups, you should monitor service uptake/ satisfaction by this category to inform further needs assessments.

(A) Protected group	(B) Could access to services for this group be limited? If 'don't know', you may need to monitor to find out Yes (✓)	(C) Will you collect equalities data for this group? Yes (✓)	(D) For any group not being monitored in column C, please provide justification for why equalities data is not needed/ not feasible to collect
Age (e.g. children, young adults, older people)			
Disability (e.g. physical disability, mental illness, learning disability)			
Gender identity (male, female, other, non-binary, prefer not to say)			
Pregnancy or maternity (of particular relevant to employment equality)			
Religion, religion or belief (belief systems that may influence behaviour e.g. Muslim women, orthodox Jews)			
Sexual orientation (e.g. lesbian, gay, bisexual, heterosexual)			
Ethnicity			
Marriage and civil Partnerships (particular relevant to employment equality)			
Social and economic grade (Unemployed/ on benefits, low/ high income)			

Section 3 – Equalities monitoring plan *This is your commitment to action or justification for why you cannot monitor the relevant groups.*

<p>6. For the groups identified, how will you gather monitoring data? <i>Monitoring should be built into existing points of customer contact where possible</i></p>

<p>7. When will this be in place? <i>Target date</i></p>

<p>8. How will you store the data so confidentiality is guaranteed?</p>

<p>9. What are the next steps? <i>Immediate actions required and indicative milestones</i></p>

<p>10. If you are unable to put a plan into place please state why. <i>DLTS will be responsible for agreeing action plans or justification for why equalities monitoring cannot be applied</i></p>

Section 4 – Feedback and review

To be completed after the proposal has been considered by DLT and/or Consultation and Engagement Lead

<p>Date DLT 11/11/11</p>			
Comments or suggestions	Made by	Date due	Lead officer

Appendix C

Complying with the Data Protection Act (1998) in storing personal data

Storage of personal data for the purpose of equalities monitoring must comply with the council policy for data protection and the Data Protection Act (1998). Some of the relevant points from the [Lambeth data protection policy](#) are provided below:

Information handling and collection

- The council will, at the point of collection and as far as it is practicable, inform individuals of the purposes for which the council will use their personal data.
- Council departments will take all reasonable steps to ensure that the personal data they hold is accurate in respect of matters of fact and where necessary, kept up to date.
- The council will hold only that personal data which is needed to carry out its duties.
- The council will not hold personal data for longer than it is reasonably required in line with the council's Document Retention and Disposal Standard.
- All requests for personal data from data subjects will be dealt with in accordance with the council's Subject Access Request Policy.

Security

- Access to the council's systems will be password protected to ensure that personal information is only accessible by those individuals that need it to undertake their job.
- Paper files and manual records containing personal data will be stored in secure environments.
- Records containing personal data will be safely and responsibly disposed of when they are no longer required.

Disclosures of personal data

- The council reserves the right to disclose information under certain circumstances where allowed by law. When a request for disclosure is made by an organisation, the council will consider each request individually and where a disclosure takes place, the council will disclose only the minimum amount necessary.
- If the council is sharing personal data on a regular basis with other organisations we will ensure that there are written protocols in place governing the sharing of that personal data and that these are published on our website.

For further enquiries about the data protection policy should be directed to the council's Information Governance Team.

In addition to the general guidance on data protection above, it should also be noted that:

- Explicit consent for us to hold and use personal data is not necessary providing the purpose for collection is our statutory equalities monitoring obligation. However, any further disclosures of the collected information outside of this obligation (that is not anonymised) will need explicit consent. Therefore if, at the point of collecting personal data, the service is aware that it will be use for wider purposes than equalities monitoring, and will not be anonymised, consent should be gathered at the outset.
- The Gender Recognition Act (2004) states that for employers, where someone holds a gender recognition certificate, they must be treated according to their acquired gender and it is a criminal offence to disclose the fact that they have changed their sex. A person who identifies as non-binary may consent to you disclosing the information if they decide it is in their interests to do so. Such consent, however, must be explicit. It may not be assumed.