



### **Cabinet Member for Policing and Equalities**

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#### **Time and Date**

9.30 am on Thursday, 30th January, 2025

#### **Place**

Committee Room 3 - Council House

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#### **Public Business**

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 4)
  - (a) To agree the minutes of the Cabinet Member (Policing and Equalities) meeting held on 25 November 2024
  - (b) Matters arising
4. **Petition - Petition Against Proposed Car Park Charges at the War Memorial Park** (Pages 5 - 10)

Report of the Director of City Services and Commercial

To consider the above petitions bearing 27 signatures. The petition has been sponsored by Councillor K Sandhu, an Earlsdon Ward Councillor, who has been invited to the meeting for the consideration of this item along with the Petition Organiser.
5. **Annual Compliance Report 2023 - Regulatory & Investigatory Powers Act (RIPA) 2000** (Pages 11 - 18)

Report of the Director of Law and Governance
6. **Proposed New Equalities Objectives 2025-28** (Pages 19 - 56)

Report of the Director of Law and Governance
7. **Outstanding Issues**

There are no outstanding issues
8. **Any Other Business**

To consider any other items of business which the Cabinet Member decides to take as a matter of urgency because of the special circumstances involved.

**Private Business**

Nil

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Julie Newman, Director of Law and Governance, Council House, Coventry

Wednesday, 22 January 2025

Note: The person to contact about the agenda and documents for this meeting is Lara Knight Email: [lara.knight@coventry.gov.uk](mailto:lara.knight@coventry.gov.uk)

Membership: Councillors P Akhtar (Deputy Cabinet Member), AS Khan (Cabinet Member) and J Lepoidevin (Shadow Cabinet Member)

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**Lara Knight**

**Email: [lara.knight@coventry.gov.uk](mailto:lara.knight@coventry.gov.uk)**

**Coventry City Council**  
**Minutes of the Meeting of Cabinet Member for Policing and Equalities held at**  
**9.00 am on Monday, 25 November 2024**

Present:

Members: Councillor AS Khan (Cabinet Member)

Employees (by Service Area):

Law and Governance: S Bennett, D Cahalin-Heath, F Cartwright, R Masih, A Wright

## **Public Business**

### **11. Declarations of Interest**

There were no declarations of interest.

### **12. Minutes**

The Minutes of the meeting held on 7 October 2024 were agreed and signed as a true record.

There were no matters arising.

### **13. Gambling Act 2005 - Review of Gambling Policy Statement of Principles 2025 - 2028**

The Cabinet Member considered a report of the Director of Law and Governance which provided an update on the outcome of the six-week consultation undertaken on the review of the Council's Gambling Policy Statement of Principles for the Gambling Act 2005 and to recommend a revised policy for the period 2025-2028. The Draft Gambling Policy, Consultation responses and the local area profile were appended to the report. The report had been considered by the Licensing and Regulatory Committee at their meeting on 19 November 2024 (their Minute 13/24 refers) and would also be considered by Council at their meeting on 3 December 2024.

The Gambling Act 2005 required each Licensing Authority to prepare and publish a Gambling Policy Statement of Principles. The policy sets out how the licensing authority intends to approach its licensing responsibilities and how it intended to promote the three licensing objectives.

The current Gambling Policy came into effect on 3 January 2022, to cover a period up to 31 January 2025. The policy must be renewed every three years and be subject to a full consultation process.

The report advised Members of the consultation process that had taken place and outlined the comments received and amendments made to the Council's draft Gambling Policy.

There were no major changes to the policy except some minor wording amendments. The general principles of the Gambling Policy Statement of Principles remained the same and the document was still centred around the Gambling Act's three licensing objectives, namely:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

Following public consultation, the revised draft Gambling Policy Statement of Principles was now ready to be recommended for adoption to take effect from 31 January 2025.

The Cabinet Member noted that the report had been considered by the Licensing and Regulatory Committee at their meeting on 19 November 2024 and that the Committee had recommended that the Cabinet Member explore ways to increase future responses to consultations and writes to the Government asking them to consider reducing gambling premises in certain areas to avoid saturation.

**RESOLVED that the Cabinet Member for Policing and Equalities:**

- (a) Notes the results of the consultation and proposed changes to the revised Gambling Policy Statement of Principles for the period 2025-2028.**
- (b) Requests officers to look at the steps that could be taken to increase response rates to consultations.**
- (c) Agrees to write to the Government requesting that consideration be given to reducing the number of gambling premises in certain areas to avoid saturation.**
- (d) Recommends that the City Council adopts the Gambling Policy Statement of Principles as attached at Appendix A of the report.**

14. **Outstanding Issues**

There were no outstanding issues.

15. **Any Other Business**

There were no other items of business.

(Meeting closed at 9.15 am)



**Public report**  
Cabinet Member

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Cabinet Member for Policing and Equalities

30<sup>th</sup> January 2025

**Name of Cabinet Member:**

Cllr AS Khan, Deputy Leader, Cabinet Member for Policing & Equalities

**Director approving submission of the report:**

Director of City Services & Commercial

**Ward(s) affected:**

Earlsdon

**Title:**

Petition – Petition against proposed car park charges at the War Memorial Park.

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**Is this a key decision?**

No

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**Executive summary:**

A petition with 27 signatures was lodged by the Three Spires u3a, objecting to the current charges for parking in the Kenilworth Road car park at the War Memorial Park.

The Three Spires u3a are members of the u3a (University of the Third age) which holds group meetings on a regular basis between 10:30am and 12:30pm at the visitor centre in the War Memorial Park. The 3 hour free parking limit is insufficient for them to enjoy refreshments at the café after the group meetings have concluded.

In accordance with the City Council's procedure for dealing with petitions, those relating to parks are heard by the Cabinet Member for Policing & Equalities.

The Cabinet Member had considered the petition prior to this meeting and requested that the petition was dealt with by determination letter rather than a formal report being submitted to a meeting, to be able to deal with the matter more efficiently. On receipt of the determination letter, the petition organiser requested that the issue be considered at a Cabinet Member for Policing & Equalities meeting.

The petition reads as follows:

*“Petition against proposed charges for the car park at War Memorial Park – all charging at the Kenilworth Road car park should be scrapped”.*

**Recommendations:**

- 1. Note the Petitioners' concerns.**
- 2. Endorse the actions which had been agreed to be issued by determination letter to the petition organiser as detailed in paragraph 1.0 of the report.**

**List of Appendices included:**

None

**Background papers:**

**Other useful documents**

Cabinet member report for Strategic Finance and Resources 5 Feb 2024

**Has it or will it be considered by Scrutiny?**

No

**Has it or will it be considered by any other Council Committee, Advisory Panel or other body?**

No

**Will this report go to Council?**

No

**Report title:** Petition – Petition against proposed charges car park at War Memorial Park.  
Scrap all charges.

## **1. Context (or background)**

Three Spires u3a are objecting to the current charges for parking in the Kenilworth Road car park at the War Memorial Park.

They are members of the u3a (University of the 3<sup>rd</sup> age) which holds group meetings on a regular basis between 10:30am and 12:30pm at the visitor centre in the War Memorial Park. The three-hour free parking limit is insufficient for them to enjoy refreshments at the café after the group meetings have concluded and they are requesting that all car parking charges are removed for this car park.

Parking charges are necessary to meet the financial demands of maintaining Parks and Openspaces across the City including the WMP and its associated sites such as Spencer Park, Top Green and Allesley Parks.

Over the past 6 years, the council has embarked on a commercialism approach that seeks to maximise the value of every asset that the Council holds including seeking to generate new revenue for the Council, helping to protect, support and invest in services provided within the Parks and partially mitigates the impact of proposed/potential reductions in revenue for the service.

### **Budget Setting Proposals 2024/25**

The Council is required to set a balanced budget, and this legal duty is balanced with continuing to deliver the key services to residents and businesses in the City. The Pre-Budget report (2024-2025) forecast a £9m shortfall and indicated that this had been brought on by rising demand, underfunding and the tough economic climate, not just in Coventry but across the whole sector. As a result of these pressures, a number of cost-cutting proposals were put forward for residents, colleagues and businesses to comment on. The proposals were subject to an eight-week consultation period which ended on 7 February 2024.

One such proposal was to remove the current 3 hours free parking at the War Memorial Park and standardise parking charges with those at Coombe Abbey Park, as follows (based on 23/24 charges at the time):

Up to 1 hour - £1  
1-2 hours - £3  
2-4 hours £3.50  
Day ticket £5

However, this proposal was rejected, and the three hours period of free parking remains in place.

The financial impact of removing all charges for parking would be significant and contra to the city councils One Coventry Plan - enabling priority – Continued financial sustainability of the council.

It should be noted that the actual income received in 2023/24 was £54,395 against an income target of £139k as a result of the service not being able to implement the intended charges following budget setting for 24/25 placing further pressure on the Parks & Open Spaces service.

## **2. Options considered and recommended proposal**

### 2.1. Options available are:

#### Option 1

Reject the petition and allow the current parking charges to continue.

#### Option 2

Accept the petitions recommendations.

### 2.2. Cabinet Member is recommended to approve option 1.

## **3. Results of consultation undertaken**

### 3.1. No consultation undertaken.

## **4. Timetable for implementing this decision**

### 4.1. The decision will be implemented soon after Cabinet Member's decision.

## **5. Comments from Chief Operating Officer (Section 151 Officer) and Chief Legal Officer**

### 5.1. Financial Implications

There are significant financial implications if the parking charges are removed. The reduction in income would have a significant impact on service delivery. Budget figures are detail with this report.

### 5.2. Legal Implications

None

## **6. Other implications**

### 6.1. How will this contribute to the One Coventry Plan?

<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>

This decision contributes to the One Coventry Plan enabling priority – Continued financial sustainability of the council.

### 6.2. How is risk being managed?

None



**6.3. What is the impact on the organisation?**

Significant financial impact should the parking charges be removed. Removing the car park charges at WMP would result in a loss of income (c£54k) which would then impact on the standard of maintenance carried out.

**6.4. Equalities / EIA?**

An EIA has not been undertaken.

**6.5. Implications for (or impact on) climate change and the environment?**

No assessment on the impact on climate change has been carried out.

**6.6. Implications for partner organisations?**

None

**Report author(s):**

Name Tim Wetherhill

Title: Parks &amp; Openspaces Manager

**Service Area: Environmental Services Team****Tel and email contact:**Tel: **02476972599**

Email: tim.wetherhill@coventry.gov.uk

Enquiries should be directed to the above person

<b>Contributor/approver name</b>	<b>Title</b>	<b>Service Area</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Lara Knight	Governance Services Co-ordinator	Law and Governance	17/1/25	21/1/25
Other Members				
<b>Names of approvers for submission:</b> (officers and members)				
Finance: Cath Crosby	Lead Accountant	Finance	22/10/24	23/10/24
Legal: Faye Cartwright	Team Manager	Law and Governance	27/11/24	13/01/2025
Director: Andrew Walster	Director of City Services & Commercial	-	14/01/2025	17/01/2025
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Audit and Procurement Committee  
Cabinet Member for Policing and Equalities

25 November 2024  
30 January 2025

**Name of Cabinet Member:**

Cabinet Member for Policing and Equalities – Councillor AS Khan

**Director Approving Submission of the report:**

Director of Law and Governance

**Ward(s) affected:**

None

**Title:**

Annual Compliance Report 2023 - Regulatory & Investigatory Powers Act (RIPA) 2000

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**Is this a key decision?**

No

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**Executive Summary:**

The Regulation of Investigatory Powers Act 2000 (RIPA) enables the Council to use covert surveillance; covert human intelligence sources (CHIS); and the acquisition of service use or subscriber information in relation to communications data in a manner that is compatible with Article 8 of the European Convention on Human Rights governing an individual's right to respect for their private and family life, home and correspondence.

The Council uses powers under RIPA to support its core functions for the purpose of prevention and detection of crime where an offence may be punishable by a custodial sentence of 6 months or more or are related to the underage sale of alcohol and tobacco. There are three processes available to local authorities under RIPA: the acquisition and disclosure of communications data; directed surveillance; and covert human intelligence sources ("CHIS").

The Act sets out the procedures that the Council must follow if it wishes to use directed surveillance techniques or acquire communications data in order to support core function activities (e.g. typically those undertaken by Business Compliance and Environmental Health). The information obtained as a result of such operations, can later be relied upon in court proceedings providing RIPA is complied with.

The Home Office Code for Covert Surveillance and Property Interference recommends that Elected Members, whilst not involved in making decisions or specific authorisations for the local authority to use its powers under Part II of the Act, should review the Council's use of the legislation and provide approval to its policies. The Council adopted this approach for oversight of the authority's use of Parts I and II of the Act. **Page 11**

**Recommendations:**

The Audit and Procurement Committee is requested to:

- 1) Consider and note the Council's use and compliance with RIPA.
- 2) Forward any comments and/or recommendations to the Cabinet Member for Policing and Equalities.

The Cabinet Member for Policing and Equalities is requested to:

- 1) Consider any comments and/or recommendations provided by the Audit and Procurement Committee.
- 2) Approve the report as a formal record of the Council's use and compliance with RIPA.

**List of Appendices included:**

None

**Other useful background papers:**

None

**Other useful background information:**

None

**Has it been or will it be considered by Scrutiny?**

No

**Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?**

Yes – Cabinet Member for Policing and Equalities 30<sup>th</sup> January 2025

**Will this report go to Council?**

No

Report title: **Annual Compliance Report 2023 - Regulatory & Investigatory Powers Act (RIPA) 2000**

**1. Context (or background)**

- 1.1 RIPA governs the acquisition and disclosure of communications data and the use of covert surveillance by local authorities. The Council can only use powers under RIPA to support its core functions for the purpose of prevention and detection of crime.
- 1.2 There are different thresholds that need to be met before any surveillance can be undertaken. In the case of Directed Surveillance or the use of Covert Human Intelligence Sources (CHIS) an offence has to be punishable by a custodial sentence of 6 months or more or the offence is related to the underage sale of alcohol and/or tobacco. In the case of Communications Data an offence has to be punishable by a custodial sentence of 12 months or more (e.g. offences relating to counterfeit goods which carry a maximum penalty of 10 years in prison).
- 1.3 Where the above criteria are met, local authorities can make an application for the acquisition and disclosure of communications data (such as telephone billing information or subscriber details) or directed surveillance (covert surveillance of individuals in public places); and the use of a CHIS (such as the deployment of undercover officers). The powers are most commonly used by Business Compliance. However, powers can also be used by other Council services if their offences meet the serious crime threshold, mentioned in 1.2 above.
- 1.4 RIPA and Codes of Practice set out the procedures that local authorities must follow when undertaking surveillance. These include approval by Authorised Council Officers for Directed Surveillance / CHIS applications to show that the proposed use of the powers is “necessary and proportionate”.
- 1.5 The Council is required to have a Senior Responsible Officer to maintain oversight of the RIPA arrangements, procedures and operations. The Council’s Monitoring Officer performs this function and is responsible for the integrity of the Council’s process for managing the requirements under RIPA.
- 1.6 Since 1 September 2017, the [Investigatory Powers Commissioner's Office](#) (IPCO) has been responsible for the judicial oversight of the use of covert surveillance by public authorities throughout the United Kingdom.
- 1.7 2019 saw the implementation of Part 3 of the Investigatory Powers Act 2016 (IPA). The introduction of this legislation has seen the most significant change to the acquisition of communications data in recent years. The IPA consolidates all existing powers available to law enforcement and other agencies. It radically overhauls the way these powers are authorised and overseen. The legislation also ensures that the powers conveyed are fit for the fast-moving digital age that we live in. The IPA has introduced the Office for Communications Data Authorisation (OCDA) which is now responsible for independently authorising all applications for communications data. This has removed the requirement for local authorities to seek judicial approval for communications data. In addition, the legislation has

broadened the range of communications data available including access to location data.

1.8 The acquisition of communications data is undertaken through the National Antifraud Network (NAFN). They act as the single point of contact for many local authorities and ensure the application is RIPA/ IPA compliant. It is NAFN that are audited by the commissioners.

1.9 Details of the applications that the Council has made are set out below:

1.9.1 Use of Directed Surveillance or Covert Human Intelligence Sources

For the Period 1 January 2023 – 31 December 2023

The number of applications made for a Directed Surveillance authorization	0
The number of Directed Surveillance authorisations successfully granted	0
The number of Directed Surveillance authorisations that were cancelled	0
The number of Directed Surveillance authorisations extant at the end of the year	0

- There were no reported instances of the Council having misused its powers under the Act.

1.9.2 Use of Acquisition & Disclosure of Communications Data

No applications for the disclosure of communications data were made during the period 1 January 2023 – 31 December 2023.

1.10 Statistical Data

The IPCO require annual statistical data each year. The Annual Report of the Investigatory Powers Commissioner 2020 (last report at the time of writing, published 6 January 2022) is published on the IPCO website at the following link: <https://www.ipco.org.uk/publications/annual-reports/#:~:text=report%20in%20Parliament.-,06%20January%202022,-Annual%20Report%202020> . Part 15 provides the findings relating to local authorities.

## 1.11 RIPA Training

It is recommended good practice to provide RIPA training to all relevant Officers periodically. A one-day training session was delivered on 20 April 2023 and a further session is in the process of being arranged as a refresher.

## 2. Options considered and recommended proposal

### 2.1 The recommended proposal is that:

- Audit and Procurement Committee consider and note the Annual Compliance Report, which sets out how the Council has used its powers during the reporting periods of the individual Commissioners. In addition, the Committee is recommended to forward any comments or recommendations to the Deputy Leader Policing and Equalities; and
- The Deputy Leader Policing and Equalities is recommended to consider any comments and/or recommendations from the Audit and Procurement Committee and approve the report as a formal record of the Council's use and compliance with RIPA.

2.2 The only other option is to "Do Nothing" which is not recommended as this would result in inadequate oversight and scrutiny by elected members on how the Council has used its powers during the reporting periods set out in this report

## 3. Results of consultation undertaken

3.1 Not applicable

## 4. Timetable for implementing this decision

4.1 The report will be a formal record of the Council's use of RIPA in 2023 when approved by the Cabinet Member for Policing and Equalities.

## 5. Comments from the Director of Finance and Resources and the Director of Law and Governance

### 5.1 Financial implications

The Council has budget provision to cover the cost of the training, which will be delivered by an external trainer who specialises in RIPA legislation. There are no other direct financial implications arising from this report.

### 5.2 Legal implications

There are no legal implications arising directly from this report.

The powers of local authorities have remained largely unchanged following the introduction of the Investigatory Powers Act 2016. However, Officers will continue to monitor the operation of RIPA and ensure that any amendments are incorporated into the Council's policy and procedures as appropriate.

Consideration and endorsement by Members, ensures that appropriate scrutiny is in place. Consideration of RIPA activity as recommended by the OSC guidance ensures that such activity is subject to appropriate scrutiny and authorisations.

## **6. Other implications**

Whilst the requirement to obtain judicial / OCDA approval introduced an additional step into the process, given the Council's low use of its powers under RIPA, it has not resulted in any significant delays for planned operations. Routine patrols, ad-hoc observations at trouble 'hot spots', immediate response to events and overt use of CCTV do not require RIPA authorisation.

### **6.1 How will this contribute to achievement of the One Coventry Plan?** **<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>**

As and when judicial / OCDA approval is sought to use these powers, it will help support the Council's core aims by preventing and detecting crime associated with enforcement activities such as: investigations relating to counterfeiting and fraudulent trading activity, or underage sales of alcohol or tobacco.

### **6.2 How is risk being managed?**

The requirement for the Council to seek judicial / OCDA approval for any proposed use of its powers under the Regulation of Investigatory Powers Act 2000, as amended by the Protection of Freedoms Act 2012 and IPA, reduces the risk of the Council using such powers inappropriately or unlawfully. This will help ensure any evidence gained from such use will be admissible in a court of law.

### **6.3 What is the impact on the organisation?**

There is no additional impact on the Council.

### **6.4 Equalities / EIA**

When submitting a request for authorisation to use RIPA, consideration is given to any impact on equalities.

### **6.5 Implications for (or impact on) climate change and the environment?**

There are no implications on the environment.

### **6.6 Implications for partner organisations?**

There are no implications on partner organisations.



**Report author:**

**Name and job title:**

Oluremi Aremu  
Head of Legal and Procurement Services

**Service Area:**

Law and Governance

**Tel and email contact:**

Tel: 024 76972 070

Email: [Oluremi.aremu@coventry.gov.uk](mailto:Oluremi.aremu@coventry.gov.uk)

Enquiries should be directed to the above.

<b>Contributor/ approver name</b>	<b>Title</b>	<b>Service area</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Rob Back	Strategic Lead - Planning	City Services and Commercial	04/10/2024	08/10/2024
Debbie Cahalin-Heath	Strategic Manager	Law and Governance	04/10/2024	11/10/2024
Sue Gilbert	Information Governance Officer	Law and Governance	04/10/2024	07/10/2024
Michelle Salmon	Governance Services Officer	Law and Governance	04/10/2024	04/10/2024
<b>Names of approvers for submission: (officers and members)</b>				
Andrew Walster	Director of City Services and Commercial	City Services and Commercial	14/10/2024	14/10/2024
Davina Blackburn	Strategic Lead - Regulation and Communities	Law and Governance	14/10/2024	15/10/2024
Cath Crosby	Lead Accountant (Business Partnering)	Finance and Resources	14/10/2024	15/10/2024
Julie Newman	Director of Law and Governance (Monitoring Officer)	Law and Governance	14/10/2024	15/10/2024
Councillor A S Khan	Cabinet Member for Policing and Equalities	-	14/10/2024	21/10/2024

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Cabinet Member for Policing and Equalities

30<sup>th</sup> January 2025

**Name of Cabinet Member:**

Cabinet Member for Policing and Equalities - Councillor AS Khan

**Director approving submission of the report:**

Director of Law & Governance

**Ward(s) affected:**

All

**Title:**

Proposed New Equalities Objectives 2025-28

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**Is this a key decision?**

No – although the proposals affect more than two electoral wards, the impact is not expected to be significant

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**Executive summary:**

Coventry City Council is committed to fulfilling its duties as a public authority under the Public Sector Equality Duty. As part of this general duty, we are required to comply with a specific duty to publish a set of equality objectives which will further the aims of the general duty. The current set of equality objectives were set in 2022 for a period of three years and will therefore expire at the end of March 2025. A set of four proposed new equality objectives were recently the subject of a public consultation exercise which has now been analysed. This report therefore seeks approval for the formal adoption of the proposed new equality objectives for 2025-28.

**Recommendations:**

The Cabinet Member for Policing and Equalities is recommended to:

- (1) Approve the formal adoption of the following proposed new equality objectives for the Council for 2025-28:

**Equality Objective 1:** Deliver inclusive services that better meet the needs of our diverse communities through better use of data, including equalities data

**Equality Objective 2:** Promote integration, remove barriers and improve community cohesion across Coventry through targeted activities that address the diverse needs of our newly arrived communities

**Equality Objective 3:** To Increase year on year the percentage of appointments made to candidates who are either LGBT+, with a Disability or from the Global Majority and reduce the number of leavers from these demographics.

**Equality Objective 4:** To Improve outcomes and tackle inequalities within our communities

**List of appendices included:**

Appendix 1 – Equality Impact Assessment (EIA)  
Appendix 2 – Consultation Report

**Background papers:**

None

**Other useful documents:**

Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017

Equality Act 2010: specific duties to support the Equality Duty. What do I need to know?  
A quick start guide for public sector organisations  
<http://www.homeoffice.gov.uk/publications/equalities/equality-act-publications/equality-act-guidance/specific-duties>

**Has it been or will it be considered by scrutiny?**

No

**Has it been or will it be considered by any other council committee, advisory panel or other body?**

No

**Will this report go to Council?**

No

## Report title: Proposed New Equality Objectives 2025-28

### 1. Context (or background)

- 1.1 The Council is required, as a listed public authority, to comply with all elements of the Public Sector Equality Duty (PSED). This duty is comprised of the general duty and specific duties.
- 1.2 The general duty requires the Council to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation
  - Advance equality of opportunity between people who share a protected characteristic and those who do not
  - Foster good relations between people who share a protected characteristic and those who do not
- 1.3 The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 requires the Council, as a listed public authority, to publish equality objectives that it thinks it needs to achieve to further any of the aims of the general equality duty.
- 1.4 The existing set of 5 equality objectives were set in 2022 for a period of three years and will expire at the end of March 2025.

### 2. Options considered and recommended proposal

- 2.1 The Council's current set of 5 equality objectives were adopted in 2022 and some key highlights of the progress made against these objectives can be found below.
- 2.2 **Equality Objective 1** - Improve the collection and analysis of equality data to make more informed decisions on how services are delivered.
- 2.2.1 A series of projects have been delivered under this objective as follows:
- 2.2.2 **Waste Services** – Data on fly tipping, bulky waste and the tip booking system was analysed at lower super output level and compared, using the Acorn analysis tool, to factors such as the Index of Deprivation and income level. This enabled the service to identify clear trends in relation to the use of these services.
- 2.2.3 **Community Support Team – Household Fund** - The demographic data of applicants was analysed by ward level and this showed that the highest number of applications were being received from those wards with the highest Index of Multiple Deprivation score. This indicated that the most financially vulnerable clients were accessing the fund. Further analysis by ethnicity showed an under-representation of applications received from people identifying as Asian/Asian British across the city. This enabled a series of actions to be set as part of this project.

2.2.4 **Adult Education** – work was undertaken with the service to link client data to data sets such as the Index of Deprivation and income. Additional software was also sourced to facilitate this.

2.2.5 **Foster Carers** – initial work has taken place to collate postcode data of foster carers/those expressing an interest in foster care. Analysis of this data is being undertaken, with a view to setting relevant actions over the coming months.

2.3 **Equality Objective 2** - Develop better understanding of our diverse communities in order to shape and deliver the Council's Integration policy and practice for the city and its residents.

2.3.1 Extensive engagement work was undertaken with relevant stakeholders to inform the development of a draft Integration Strategy under this equality objective. This enabled the views of a range of organisations and individuals with 'lived experience' of the different stages of the integration journey to actively feed into the strategy. Work has been commissioned across various themes to ensure alignment with the broader Integration Strategy. These efforts are helping to shape and refine the action plan, ensuring each priority area is evidence-based and reflective of the needs of Coventry's diverse communities. As part of this, a deep dive into migrant health and wellbeing was recently undertaken and represents a critical advancement in understanding and responding to migrant health needs. Ongoing thematic development is ensuring that the Integration Strategy and its action plan remain robust, targeted, and reflective of Coventry's commitment to fostering inclusive and positive relationships within the city.

2.4 **Equality Objective** - To increase year on year the percentage of applications for employment received and appointments made for candidates who are LGBT+, declare a disability or are from minority ethnic backgrounds.

2.4.1 Applications received

2.4.2 There have been a relatively similar number of applications received from candidates from a minority ethnic background since 2022 to date. At the end of 2022 a total of 61.12% of applications were received from minority ethnic candidates as compared to 61.88% by the end of September 2024.

2.4.3 There has been an increase in the number of applications received from candidates who declared a disability since 2022 to date. At the end of 2022 a total of 6.74% of applications were received from candidates with a disability as compared to 8.96% by the end of September 2024.

2.4.4 There has been a decrease in the number of applications received from candidates from the LGBT+ community since 2022. At the end of 2022 a total of 7.95% of applications were received from LGBT+ candidates as compared to 5.90% by the end of September 2024.

2.4.5 Appointments/offers made

- 2.4.6 There has been a significant decrease in the number of appointments or offers made to candidates from a minority ethnic background since 2022 to date. At the end of 2022 a total of 40.94% of appointments or offers were made to minority ethnic candidates as compared to 29.96% by the end of September 2024. It should be noted that during the period between 2022 and the end of September 2024 the number of appointments made has fluctuated between the two percentages. As a result of the disproportionate number of appointments made (which are anonymised compared to applications received) we have introduced ethnically diverse interview panels for all jobs which are Grade 8 and above.
- 2.4.7 There has been an increase in the number of appointments or offers made to candidates with a disability since 2022 to date. At the end of 2022 a total of 8.19% of appointments or offers were made to candidates with a disability as compared to 11.39% by the end of September 2024.
- 2.4.8 There has been a relatively similar number of appointments or offers made to LGBT+ candidates since the end of 2022 to date. At the end of 2022 a total of 5.26% of appointments or offers were made to LGBT+ candidates compared to 5.91% by the end of September 2024.
- 2.4.9 The reduction in applications received and appointments/offers made to individuals from the 3 priority groups under this equality objective has to be considered in the context of the Council's financial position and the reduction in vacancies advertised.
- 2.4.10 As a result of the overall decrease in appointment figures, the Council introduced a new initiative in September 2024, 'Inclusive Recruitment' where all interview panels for posts Grade 8 and above include a person from a minority ethnic background as a panel member. All panel members are employees and have received training to ensure that there are able to add value to this initiative. The review of this initiative on its impact and effectiveness will be presented at a future Diversity & Inclusion Board.

In addition,

- Continued ongoing development for hiring managers which focusses on Recruiting for Workforce Diversity.
- All vacancies are sent to all community organisations on a weekly basis. The Council is also making use of its subscription to Race Equality Matters to promote and advertise posts.
- Continued engagement with the community and The Job Shop will help to enable candidates from minority ethnic backgrounds to be successful at reaching shortlisting to secure an assessment or interview.

Finally leavers information will be one of the reporting elements within the Council's Equality Objectives 3 for the coming year.

- 2.4.11 Additional information on disability data - to support the Council's commitment to engaging more candidates with a disability to apply for vacancies our accessibility project has recently been completed going forward we will monitor the number of applications who have accessed the changes These changes include the use of assistive technology for people with a visual impairment, a contact process for candidates to liaise with the recruitment team via any suitable method (in person, on videocall, telephone or email) and the opportunity to upload video applications.

We will continue with our social media campaign which promotes our commitment to recruiting people with a disability or who are neurodiverse and actively welcome applicants. We will also continue to ensure our adverts promote Coventry as an Inclusive Employer and Disability Confident Leader. In addition, the Inclusive Recruitment initiative has also been extended to cover disability.

2.4.12 Additional information on LGBT+ data - we are currently stating in our adverts that LGBT+ employees are under-represented across the organisation, and we will continue to ensure that our adverts are committed to promoting Coventry as an Inclusive Employer. Research work is planned to increase visibility of the Council as an employer of choice to the LGBT+ community, including working more closely with our PRIDE network, the ENEI, with our local LGBT+ communities and potentially hosting a recruitment stand at local Pride events. In addition, the Inclusive Recruitment initiative has also been extended to cover LGBT+.

2.5 **Equality Objective 4** - To increase the effective delivery of Council services in key areas.

2.5.1 The EO4 actions below were set for the Household Support Fund EO1 project.

- Encourage applicants to complete the ethnicity monitoring wherever possible.
- Work with colleagues in Community Resilience to promote Household Support Fund through Community Messengers to people who identify as Asian/Asian British.
- Provide a set of marketing assets which targeted specific cohorts in the community including Asian/Asian British and ensure messaging targeted communities without access to digital/social media
- Ensure that people were advised that on-line forms were available in other languages and how to access them.
- Implement a set of purposeful reports which were used to monitor applications per ward and by ethnicity in order to compare against the city population - where necessary putting in mitigating measures to ensure the Household Support Fund was being used to target households in financial hardship.
- The use of Trusted Referral routes as an alternative application method for people who were not able to use the on-line form. Working closely with partner organisations to provide this service, Central England Law Centre, Coventry Citizens' Advice and Coventry Independent Advice Service.

2.5.2 As part of the #CovConnects programme there are many opportunities where digital inclusion is promoted across the city and within our communities who are experiencing data poverty. The databank distribution is now at 23 different points.

2.5.3 Working closely with Cost-of-Living campaign, leaflets, flyers and videos were made available in different languages, and all promoting Cost of Living support available which includes Household Support Fund.

2.5.4 The actions set for this service were largely delivered during 2022.



- 2.5.5 Waste Services: Ongoing budget constraints and changes to domestic waste services has meant that the Bring the Tip to you project and Project Rome have been paused. These projects include actions developed in response to the data analysis undertaken as part of the Equality Objective One project with the service. However, the skill set to analyse data for these projects has been utilised in other areas within Waste. As the new paid for garden waste service has been launched, weekly extracts of the data are being analysed and uploaded to a PowerBi dashboard, allowing insights into the areas that are taking up subscriptions and in turn identify areas that are not.
- 2.6 **Equality Objective 5** - Increase participation from residents and visitors with disabilities in sporting and cultural activities including events in the city.
- 2.6.1 Cultural Compact was restructured as 'Coventry Culture Works' during 2023/24 with a sustainable financial and governance basis to deliver on Cultural Strategy actions. A sector-led 'Future Works' event brought together policy makers, freelancers and cultural organisations to agree priorities and actions that will help inform Cultural Strategy refresh activity, supporting health, wellbeing and diversity goals. During Q1 and Q2 24/25 the Culture Works Governance model was further refined, and the development of a diverse and inclusive operating model is planned that will be more democratic and effective in implementing the strategy refresh and progressing the next phase of delivery in a post City of Culture era.
- 2.6.2 Heritage Strategy – A consultancy has been appointed to develop the draft strategy through to completion. Further work and refinement has been paused pending additional heritage asset management information gathering. The draft strategy is expected to be finalised and approved for public consultation later in 2024/25. Actions and outputs will include specific reference to increasing diversity and accessibility in heritage engagement, and future delivery will identify specific projects to achieve this.
- 2.6.3 Public Arts Strategy - this strategy is awaiting appointment of a suitable consultancy to support its development. The connected Public Art Gateway group is firmly established and meets regularly to assess proposals for new public art in the city, with consideration for safety, accessibility and themes promoting diversity featuring highly in the assessment process. A public art audit has been carried out and data shared with Coventry Digital, which is helping to create an online resource for exploring the city's public art thereby supporting greater accessibility for disabled residents. Further public art projects and proposals were considered which present art in accessible outdoor spaces, while making public areas more welcoming to all residents.
- 2.6.4 Arts and Culture Programme Grants - Previous funded arts and culture grant schemes operated by the Council closed in 22/23, with evaluation reports received in 23/24 indicating positive impacts on organisational development and resilience, and positive outcomes for residents facing barriers to cultural participation through their engagement with Council supported projects. During 23-24 the service secured WMCA Double Devolved funding to support cultural commissions and placemaking activities that will enrich cultural participation in communities. The outline delivery plan was approved early in Q1 24/25 and a

series of activities – which link to Future Works priorities, Cultural Strategy and One Coventry ethos - are being delivered during 2024/25 which will observe principles of inclusion and accessibility to ensure engagement and participation is open to all. These include 4x Commissions for delivery of inclusive, co-created activities which were awarded in Q1 with delivery of activity from Q2. One of these commissions works exclusively with disabled and neuro diverse artists and performers, while other activities in the funded programme have dedicated budgets to support accessibility through bursaries and British Sign Language.

- 2.6.5 Culture – Further Sector Support - Through revenue grant/service agreements with Culture Coventry and Belgrade Theatre, accessibility has been facilitated for those residents facing barriers to cultural participation, including targeted ticketing concessions, outreach projects in the community, education programmes with SEND schools, and through artistic opportunities and collaborations with local disability groups. In Q2 Belgrade Theatre continued its partnership with Open Theatre and 3 Coventry SEND schools to run a weekly 'Next Steps' talent development programme for 10-15 young people with disabilities and provided paid placements for 2 young artists with learning disabilities to support these groups. There will be a reduction in these revenue grants/agreements from 2025/26 owing to financial pressures facing the Council, but organisations are working on mitigation plans to ensure that they will still be able to fulfil key performance indicators.
- 2.6.6 Sport and Physical Activity Strategy - Work has commenced on the Coventry Sport and Physical Activity Strategy with consultation plans underway. The strategy is being developed collaboratively between the Sport and Public Health services and consultation will include a number of Council services as well as the Disability Equality Action Partnership (DEAP), to ensure that the strategy is reflective of and improves experiences for people with disabilities. The strategy is also being developed alongside the recently launched Sport and Physical Activity Charter by the DEAP. The consultant has now been commissioned and work has begun on the strategy development with further consultation taking place in January 2025.
- 2.6.7 Coventry Playing Pitch Strategy - The Coventry Playing Pitch Strategy was approved at Cabinet on the 7th November 2023 and has now officially been adopted by the city. This went through consultation with the DEAP who supported the delivery of the strategy. The action plan is now being developed and the Stage E meeting has taken place which is the process of updating the data in the strategy alongside nation governing bodies of sport.
- 2.6.8 Coventry Indoor Sports and Aquatics Facilities Strategy - The consultation and assessment report have been completed which has recommended a Facilities Planning Model (FPM) to be run which will be built into the strategy development. The FPM study was completed regarding sports halls, swimming pools and indoor bowls. This will determine the current and future need of these facilities in the city based on current and projected populations. The next step will be to gain the relevant approvals and take to Cabinet in March 2025.
- 2.6.9 GO CV - The monthly newsletters, social media posts and App have promoted a range of activities and events to Go CV members including Go CV and Go CV+

offers and discounts. This has included discounted offers to events/activities such as summertime sessions at The Wave Waterpark, discounted Outdoor Activity Camps, Bands in the Park and the Lunt Roman Festival 2024. There has also been free entry to competitions such as winning a £50 'back to school' shopping voucher. Go CV has also promoted the Quiet Time at The Wave session which is aimed at families and individuals who have complex needs and disabilities.

2.7 Analysis of the progress made since 2022 with the current set of equality objectives has informed the development of the proposed new set of equality objectives for 2025 (see below). These proposed objectives include both foundational and direct equality objectives, as it has been identified that having a set of equality objectives which is comprised of both foundational and direct objectives is more likely to lead to achieving measurable and sustainable progress on equality and diversity for the organisation.

2.8 Accordingly, the following 4 equality objectives for 2025-28 are proposed:

2.8.1 **Equality Objective 1**

**Deliver inclusive services that better meet the needs of our diverse communities through better use of data, including equalities data**

The Council is committed to understanding more about its customers and using this intelligence to help shape the way in which we can deliver the best services for those groups of customers in most need.

2.8.2 **Equality Objective 2:**

**Promote integration, remove barriers and improve community cohesion across Coventry through targeted activities that address the diverse needs of our newly arrived communities**

The Council is keen to retain a strong focus to the third strand of the equality duty around fostering good relations between different groups. This objective will focus on the Council's work on Integration as delivered by the Migration Team.

2.8.3 **Equality Objective 3:**

**To increase year on year the percentage of appointments made to candidates who are either LGBT+, with a Disability or from the Global Majority and reduce the number of leavers from these demographics.**

The Council is committed to improving the diversity of the Council's workforce to better represent and reflect the diversity of the city.

2.8.4 **Equality Objective 4:**

**To improve outcomes and tackle inequalities within our communities**

The Council is keen to maximise its work in this area and have more of an impact on addressing inequalities in the city, through its role as a Marmot Partner.

2.9 An annual update of progress of delivery of the equality objectives will be submitted to the Cabinet Member for Policing and Equalities.

### **3 Results of consultation undertaken**

3.1 The consultation on the proposed equality objectives ran from the 4th November to the 29<sup>th</sup> November 2024. A full report on the consultation can be found in Appendix 2 of this report.

3.2 The consultation was hosted on the Council's Let's Talk Coventry consultation and engagement platform. The Let's Talk Coventry platform hosts a number of consultation and engagement exercises and is regularly advertised via email and social media. In particular, the equalities objectives consultation was specifically advertised to a range of internal and external partners and stakeholders.

3.3 The consultation can be summarised as follows:

- A total of 69 responses were received to the online survey.
- All proposed objectives gained overall agreement from respondents to the consultation.
- Objectives 1 and 4 gained the highest level of agreement at 78% of those responding to the survey. This was closely followed by 73% of respondents agreeing with Objective 2.
- Objective 3 had 51% of respondents agreeing to the objective.

3.4 The results of the consultation will be fed into the development of action plans for each Equality Objective and the issues raised will be addressed through this approach.

### **4. Timetable for implementing this decision**

4.1 It is intended that the proposed new equality objectives for the Council become operational from 1<sup>st</sup> April 2025; they will be supported by action plans with clear outcomes which will be performance managed and progress reported annually to Cabinet Member (Policing & Equalities)..

### **5 Comments from Director of Finance and Resources and Director of Law and Governance**

#### **5.1 Financial implications**

The cost for setting and monitoring equality objectives and delivering equality objectives will be met from within existing resources.

#### **5.2 Legal implications**

This report recommends approval for publishing the Council's equality objectives as required under the Equality Act (Specific Duties and Public Authorities) Regulations 2017. Any sharing of personal data or special category personal data between Council services will be in compliance with the General Data Protection Regulations 2016 and the Data Protection Act 2018

### **6 Other implications**

**6.1 How will this contribute to achievement of the Council’s Plan**  
([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))

The achievement of the equality objectives will be managed in accordance the Council’s performance management framework.

**6.2 How is risk being managed?**

The performance management of the equality objectives will help the Council to manage risk by systematically measuring progress in relation to the equality objectives. This means that areas where good progress is being made can be identified, as well as those areas where progress is not as expected and where corrective action may be needed.

**6.3 What is the impact on the organisation?**

Achieving progress against the equality objectives impacts on the compliance of the whole organisation with the Public Sector Equality Duty. The Council, through its employees, has a duty to pay due regard to the three aims of the Equality Act when exercising public functions.

**6.4 Equalities Impact Assessment**

The process outlined in this report will enable the Council to comply with its obligations under the Equality Act (Specific Duties and Public Authorities) Regulations 2017.

An EIA has been completed as part of the process of developing new equality objectives and can be found at Appendix 1.

**6.5 Implications for (or impact on) climate change and the environment**

None identified.

**6.6 Implications for partner organisations?**

Many of the Council’s objectives are delivered through partnership working which means that there will be implications for partner organisations.

**Report author(s):**

**Name and job title:** Jaspal Mann, Strategic Lead, Equality, Diversity & Inclusion

**Directorate:** Performance & Planning

**Tel and email contact:** 024 7697 7109

Enquiries should be directed to the above person.

<b>Contributor/approver name</b>	<b>Title</b>	<b>Service Area</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				

<b>Contributor/approver name</b>	<b>Title</b>	<b>Service Area</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
Mamta Kumar	Equality & Diversity Assistant	Performance & Planning	9/01/25	9/01/25
Suzanne Bennett	Governance Services Co-ordinator	Law & Governance	9/01/25	9/01/25
Grace Haynes	Head of People and Culture	Human Resources	7/01/25	9/01/25
<b>Names of approvers for submission: (officers and members)</b>				
Julie Newman	Director of Law & Governance	Law & Governance	9/01/25	13/01/25
Susanna Chilton	Director of Human Resources	Human Resources	9/01/25	
Laura Stockin	Solicitor	Legal Services	9/01/25	13/01/25
Richard Shirley	Lead Accountant	Finance	9/01/25	9/01/25
Members: Cllr Abdul S Khan	Cabinet Member for Policing & Equalities		9/01/25	9/01/25

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# Equality Impact Assessment

**EIA-661426271 - Proposed New Equality Objectives  
2025/2028**

## Details

<b>Title</b>	Proposed New Equality Objectives 2025/2028
<b>Author</b>	Mamta Kumar (Equality and Diversity Assistant )
<b>Head of Service</b>	Allison Duggal (Director of Public Health )
<b>Cabinet Member</b>	Councillor Abdul Khan (Policing & Equalities)

## Context and background

<b>EIA carried out on</b>	Review of policy or strategy
---------------------------	------------------------------

Under the Public Sector Equality Duty, the Council is required to publish one or more equality objectives to further the aims of the general equality duty. The current set of five equality objectives for the Council were adopted in April 2022 for a period of three years. They will therefore expire at the end of March 2025. A new set of equality objectives will go live from April 2025.

Detailed below is the proposed draft set of objectives that we would like to carry out public consultation on, together with a brief explanation of why these objectives have been chosen:

1. Deliver inclusive services that better meet the needs of our diverse communities through better use of data, including equalities data

The Council is committed to understanding more about its customers and using this intelligence to help shape the way in which we can deliver the best services for those groups of customers in most need.

2. Promote integration, remove barriers and improve community cohesion across Coventry through targeted activities that address the diverse needs of our newly arrived communities

The Council is keen to retain a strong focus to the third strand of the equality duty around fostering good relations between different groups. This objective will focus on the Council's work on Integration as delivered by the Migration Team.

3. To Increase year on year the percentage of appointments made to candidates who are either LGBT+, with a Disability or from the Global Majority and reduce the number of leavers from these demographics.

The Council is committed to improving the diversity of the Council's workforce to better represent and reflect the diversity of the city.

4. Improving outcomes and tackling inequalities within our communities

The Council is keen to maximise its work in this area and have more of an impact on addressing inequalities in the city, through its role as a Marmot Partner.

## **Background**



A range of internal and external stakeholders will need to be engaged as part of this process. This includes:

**Stakeholders**

- senior management
- employees
- trade unions
- public sector partners
- voluntary and community organisations
- residents of the city.

**Responsibility**

Director of **Performance & Planning**  
Jaspal Mann, Strategic Lead (Equality, Diversity & Inclusion)

## Consideration of impact

The resident population of Coventry in 2023 was 360,702 the average (median) age of residents of Coventry is 35 years of age (compared with 40 nationally).

The life expectancy at birth of the average person in Coventry is 77 years for males and 82 years for females (2020-22). However, this masks significant health inequalities across the city, the inequalities in life expectancy between the most and least deprived quintile of Coventry, 2020 to 2021 is 10.2 years for males and 7.5 years for females.

In the latest census, around 242,100 Coventry residents said they were born in England. This represented 70.1% of the local population.

According to the latest school census in 2022, 55.9% of Coventry's school children are from an ethnic minority group up from 39.7% in 2012. The largest ethnic minorities in school children are Black African (11.4%), non-British white (10.2%), and Asian Indian (8.9%).

In Coventry in 2021/22, 21.4% of children under the age of 16 live in homes with 'absolute' low incomes, compared to 21.4% throughout the West Midlands and 15.3% in England. The percentage of children living in 'relative poverty' in Coventry is 26.7%, amounting to an estimated 18,267 children. This compares to 27.0% throughout the West Midlands and 19.9% in England. This has been an increasing trend in Coventry, and elsewhere, since 2014/15.

In 2022, the percentage of households in fuel poverty in Coventry is 22.7%. However, for Coventry households in 16 MSOAs, the percentage of households in fuel poverty is more than this - with 4 over 40% of households (Foleshill West, Foleshill East, Hillfields and Lower Stoke & Gosford Park) some of the most deprived parts of

## Baseline data and information

the city. Modelled using the Low-Income Low Energy Efficiency (LILEE) measure.

According to the local concentration measure, Coventry ranks as 81st most deprived out of 317, an improvement from 59th in the IMD 2015. Fewer Coventry neighbourhoods are now amongst the 10% most deprived in England.

Coventry is ranked 53rd out of all 317 authorities in England for the Income Deprivation Affecting Children Index (IDACI). This measures the proportion of all children aged 0 to 15 living in income-deprived families.

Coventry is ranked 50th out of all 317 authorities in England for the Income Deprivation Affecting Older People Index (IDAOPI). This measures the proportion of all those aged 60 or over who experience income deprivation

Source: Insight Team, Coventry City Council

### Population density

Population density measures the number of persons per hectare. As of 2021, the population density of the United Kingdom was 276 people per square kilometre. Of the countries which make up the United Kingdom, England is the most densely populated at 434 people per square kilometre. In England, there were 3 people for each football pitch-sized area of land (434 per square kilometre).

As of 2021, Coventry is the fourth most densely populated of the West Midlands' 30 local authorities, with around 25 people living on each football pitch-sized area of land (3,501 people per square kilometre). Only Birmingham (4,275), Sandwell (3,995) and Wolverhampton (3,798) are more densely populated.

The West Midlands is the third largest densely populated area in the United Kingdom in 2021 with 4.58 persons per hectare. The latest available data, for 2020, suggests the population density per square kilometre in Coventry is 34.81 persons per hectare, with significant variations per ward; the most densely populated area is Hillfields with 10,867 people per square kilometre and the least densely populated is Brownhill Green with 426 people per square kilometre.

Source: LG Inform. Accessed July 2024.

<b>Age 0-18</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>• Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>• Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>
<b>Age 19-64</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>• Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>• Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>
<b>Age 65+</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>• Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>• Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>
<b>Disability</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>• Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>• Proposed objective 3 should include plans to increase the number of disabled employees at the Council</li> <li>• Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>
<b>Gender reassignment</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>• Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>• Proposed objective 3 should include plans to increase the number of LGBT+, employees at the Council</li> <li>• Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>
<b>Pregnancy and maternity</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>• Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>• Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>
<b>Race</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>• Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>• Proposed objective 2 may include some work around opportunities for cross-community social interaction which would benefit a range of ethnic groups/communities.</li> <li>• Proposed objective 3 should include plans to increase the number of black and ethnic minority employees at the Council</li> <li>• Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>

<b>Religion and belief</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>Proposed objective 2 may include some work around opportunities for cross-community social interaction which would benefit a range of ethnic groups/communities.</li> <li>Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>
<b>Sex</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>
<b>Sexual orientation</b>	<p>Positive impact -</p> <ul style="list-style-type: none"> <li>Proposed objective 1 should enable to improve collection and analysis of data on this protected group.</li> <li>Proposed objective 3 should include plans to increase the number of LGBT+, employees at the Council</li> <li>Proposed objective 4 should improve outcomes and tackle inequalities within our communities</li> </ul>
<b>Care experienced</b>	Positive impact -

**Health inequalities (HI)**

This proposal will meet all 8 Marmot principles:

1. Give every child the best start in life
2. Enable all children, young people, and adults to maximise their capabilities and have control over their lives
3. Ensure a healthy standard of living for all
4. Create fair employment and good work for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill health prevention
7. Tackle racism, discrimination and their outcomes
8. Pursue environmental sustainability & health equity

**How HI will be reduced**

Please click link to learn further

<https://www.coventry.gov.uk/downloads/file/40657/marmot-monitoring-tool>

Coventry City Council's main service users are likely to be people in the lowest socio economic group. These service users are also mostly likely to be adversely effected by health equalities.

These equality objectives will help the council understand the data which will in turn help to improve the issues the council faces and address Health Inequalities using both dimensions socio economic status and geographical deprivation.

**Evidence showing how HI will be reduced**

By analysing and understanding the data, Coventry City Council will be able to adapt the right methods to improve services users quality of life both geographical and by socio economic status.

**Groups of people who face HI**

Armed Forces  
Care Leavers  
Residents who are in the lowest socio economic groups  
Residents with disabilities etc

**How to improve HI for groups identified**

Allow services to be targeted to support the most vulnerable and residents who do not currently engage

## Digital inequalities (DI)

**Impact to DI**

The digital divide has grown during the last 4 years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English. The 4 equality objectives will enable the digital exclusion team will work across the council to reduce digital inequalities.

**Opportunities to reduce DI**

To improve skills and support departments to enable there service users to access digital platforms. Where this is not possible to provide information in different formats

## Next steps

Inequality	Action	Owner	Timescale

**Monitor and evaluation**

Progress against equality objectives will be reported yearly to Cabinet Member (Policing & Equalities). Service areas will be monitoring impact more regularly in the form of comments, complaints, from stakeholders and regular review of management information. This will ensure negative impact is addressed as soon as possible.

## Impact on Council staff

Will there be an impact?

No

## Completion statement

**Potential equality impact**  
Page 38

Positive impact has been identified for one or more protected groups



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EQUALITY OBJECTIVES  
2025 – 2028  
CONSULTATION  
FEEDBACK

## Methodology

The consultation was carried out between 4<sup>th</sup> November 2024 until 29<sup>th</sup> November 2024, covering a period of 4 weeks.

The survey was hosted on the Let's Talk Coventry platform. This is the platform where Coventry City Council hosts all its live consultations. An easy-read text was available.

The consultation was promoted across the city through Council newsletters and social media posts.

## Survey Findings

The survey received 69 responses.

### How are you responding to this consultation?

How are you responding to this consultation?	
As a member of the public	49
On behalf of a charity, voluntary or community sector organisation (VCS)	3
As a Coventry City Council Employee	13
As a Coventry business owner or representative	1
As a local Councillor	1
Other (please specify)	1

Most of those responding said that they were responding as a member of the public, 13 responses were received from Coventry City Council employees, the 'other' response was a member of the West Midlands Combined Authority.

### Do you agree with this objective?

Deliver inclusive services that better meet the needs of our diverse communities through better use of data, including equalities data

The Council is committed to understanding more about its customers and using this intelligence to help shape the way in which we can deliver the best services for those groups of customers in most need.

Do you agree with this objective?	
Yes	53

No	15
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This objective received 68 responses, 78% of those who responded said they agreed with this objective.

Do you have any comments about this objective?

Objective	Agreement	Disagree	No Vote - Comment	Total Comments
Objective 1	22	12	0	34

Table of comments who agree with the proposal

Theme	Number
Inclusivity	7
Agreement	4
Target most in need	3
Engagement	2
Data Collection	2

Of the 22 people who agreed with this objective and the 17 who left a comment, 7 suggested that the aim needs to ensure it is inclusive rather than targeting particular groups. Services need to support all communities, even if they do not fit a particular or special category.

One person said

- We need to ensure that inclusivity is the key to attaining this objective - by focusing too specifically on diverse communities you are in danger of failing to create a homogeneous citizenship. Together we create the best outcomes.
- I'm more than a little concerned that the Council is ONLY committed to "deliver the best services for those groups of customers in most need".

Those who said they agree with the objective told us

- Of course you should use data to help make decisions

While some felt that, although in favour of data collection, they feel targeting and support should be based on need rather than category.

- I agree that data should be collected and analysed in the interests of targeting anyone who needs help, but this should be for ALL people regardless of which race, religion, colour, belief, sexuality, ability they hold ... certainly, it should ensure that no group is favoured above any other

Of those who agree with the objective and commented 3 said to target most in need.

- Sensible to target services to most in need

Two of those responding thought that connecting with the community is important and felt that opportunities should be given to meet with communities to listen to their views. 2 comments were around data collection and care needed to ensure that people are comfortable to state their characteristics openly and a need to collect data consistently across partnerships.

Of those who disagree with the objective 12 comments were received.

Theme	Number of comments
Treat everyone the same	4
Deliver good services	3
Engagement	2
Inclusivity	1

Of the 12 comments received by those against the objective 4 said that groups should not be singled out for additional or special services, one comment suggested that the financial situation of the council means that the focus should be on satisfying the majority, for others the feeling that groups without a special category are left behind was stated.

- Just treat everyone the same. No special grace or favour to any group. By biasing to LGBT for example alienates other groups. Don't single them out, simply say you treat everyone the same.

Of those against the objective 3 indicated that they would like good services, this is similar to the comments in the category above, people are keen for the majority of the city to receive good services for everyone before or instead of choosing to support equalities agendas.

- Start by delivering the best services to the majority of the city. Basically at the moment services are woeful, regardless of which group they are delivered to. Once you can demonstrate you can deliver a even a moderate to good service, then see about understanding other groups...

Engagement was raised by 2 of those not in favour of the objective.

Comments were around how to ensure that those not digitally connected can be reached and the need to get together to discuss this.

Inclusivity received 1 comment which seems to indicate that choosing to prioritise 1 characteristic means that other groups are left behind.

### Do you agree with this objective?

Promote integration, remove barriers and improve community cohesion across Coventry through targeted activities that address the diverse needs of our newly arrived communities

The Council is keen to retain a strong focus to the third strand of the equality duty around fostering good relations between different groups. This objective will focus on the Council's work on Integration as delivered by the Migration Team.

Do you agree with this objective?	
Yes	49
No	18

This question received 67 responses of those responding 73% agreed with the objective.

### Do you have any comments about this objective?

Objective	Agreement	Disagree	No Vote - Comment	Total Comments
Objective 2	19	12	0	31

### Table of comments who agree with the proposal

Theme	Number
Balance	6
Collaborate wider than the Migration Team	3
Integration	2
Finances	1
Education	1

Of the 19 people who said that they agree and left a comment, 6 people feel that there needs to be a balance between newly arrived communities and the people who live in the city and fall outside of this group.

Many feel that integration and community cohesion are both the responsibility of settled communities as well as those newly arrived.

- Also look at the diverse needs of the citizens who have lived here all their lives, and balance the 2

Of those in favour of the proposal 3 people indicated that the responsibility for this objective should be wider than the Migration Team.

- This cannot be the sole responsibility of the migration team

Integration is the theme for 2 of the comments.

- I believe that integration is good. However I find that certain groups really stick to their communities. I think that more activities to integrate everyone is key. We all can learn from each other regardless of race, sexuality and disabilities.

Finances was a concern for one person, although in favour of the objective they said:

- Yes and no again. This is a complex question with many layers. Yes support should be given, but newcomers also need to contribute to the success of any migration. It should also be noted that council funds are in short supply and are not unlimited and referring to the first question regarding equality, funds should not be disproportionately routed to the migration over any other council service.

The table below shows the themes of those not in favour of this objective

Theme	Number
Balance	5
Integration	4
Collaborate wider than the Migration Team	1
Education	1

Of the 12 people who disagree with the objective and left a comment 5 feel that there needs to be a balance between the resources allocated to newly arrived communities and other groups.

- We have enough citizens in Coventry that are living in extreme poverty, particularly children. I feel that our focus should be on them first. Then if there any resources left over, by all means use them elsewhere.

We received 4 comments about integration, Some feel that newly arrived communities do not wish to integrate with the wider community and have a duty to help promote positive relationships with the host community.

- Not sure that spending loads when there is a lack of money and you are talking about charging for services are a good use of money. You cannot promote integration unless you have shared values and some of the communities do not. Targeting resource at newly arrived communities means less in the pot for older people, children and people with disabilities so no I do not agree that targeting funding in this way helps everyone.

One comment combines both the need for this to go beyond the Migration team and for education.

- I think you need to have a collaborative approach as one size does not fit all. Also there are lots of faith groups etc that do amazing work with these types of communities so it is important to understand what services you currently offer and how effective they are and make changes accordingly. This is how you remove barriers by valuing the voice of the communities and integration will happen if the wider community is educated about difference. Issues usually occur through ignorance or what people read in the media.

### Do you agree with this objective?

To Increase year on year the percentage of appointments made to candidates who are either LGBT+, with a Disability or from the Global Majority and reduce the number of leavers from these demographics.

The Council is committed to improving the diversity of the Council’s workforce to better represent and reflect the diversity of the city.

Do you agree with this objective?	
Yes	34
No	33

This question received 67 responses and is the objective that received the most disagreement.

51% agree with this objective.

### Do you have any comments about this objective?

Objective	Agreement	Disagree	No Vote - Comment	Total Comments
Objective				
3	18	26	1	45

The table below represents the comments of those who agree with this policy and left a comment.

Theme	Number
Genuine Commitment	7
Terminology	3
Focus on leavers	3
Representative	2
Management	1
Ability	1

The largest number of comments from those who agreed with the objective and left a comment was around a genuine commitment to this.

Some comments, while agreeing that this is a good idea felt that the candidates should not be recruited based on equality criteria alone and that actions need to demonstrate that this is not a box ticking exercise.

- As long as these are not just tick box exercises but really are going to help people who are disadvantaged. Action speaks louder than words.

3 of those who commented referred to the language used.

- It's important to explain terminologies which are not familiar within wider society like 'Global Majority' - this is an academic term used widely now, but there are many people who will not understand what this means, so a definition for this and explanation of what the acronym LGBTQ+ stands for will make the messaging more accessible. LGBTQ+ is a more commonly used acronym.

3 people who agree with the objective felt that we need to look to retention and understand why people wish to leave.

- I think it's really important to look at why people are leaving - it's no good increasing the number of appointments, if the culture/environment means that they do not feel comfortable or safe and look to move on.



2 of those in favour of the objective referred to representation.

- Ideally the proportion of staff from these groups (and those in senior position)s would mirror the community
- Education to change people’s prejudices

The table below shows the comments from those who disagree with the proposal and left a comment.

Theme	Number of comments
Ability	20
Genuine commitment	2
Representative	2
Terminology	1

Ability received by far the most comments, with many stating that employment should be based on the most qualified and talented to undertake the role, and that race, sexuality and other characteristics make little or no impact on suitability for roles. While some went as far as to say that this objective is divisive.

- Employ the best candidate for each role. If they are from a minority group, great! But don't discount a good candidate just to tick a box
- The workforce should be selected from the best candidates available who will deliver the best public services. The groups listed in the above statement will benefit more from good services than they will from artificially selecting employees.

Genuine commitment received 2 comments, with one person saying they wish to raise awareness of discrimination and another wondering about approaches to this.

- If someone does not want to disclose their sexuality it is their personal choice, also some disabilities are not visible are we saying individuals would have to make this type of disclosure to be shortlisted..... I would rather be selected on what I say and can offer the organisations but what I would expect Coventry to do is to ensure that staff have an awareness of unconscious bias so that barriers for individuals that fit into the above highlighted groups are

removed, this would achieve the goals you have set out quicker and more effectively.

Of the comments received 2 indicated that the council should be representative of the wider Coventry community.

- I agree with the disabled element as they do need greater support. Just because someone is lgbt+ shouldn't put them above the straight community

### Do you agree with this objective?

Improving outcomes and tackling inequalities within our communities

The Council is keen to maximise its work in this area and have more of an impact on addressing inequalities in the city, through its role as a Marmot Partner.

Do you agree with this objective?	
Yes	50
No	14

64 people answered this question. 78% of those who responded said that they agreed with this objective.

### Do you have any comments about this objective?

Objective	Agreement	Disagree	No Vote - Comment	Total Comments
Objective 4	17	10	4	31

The below table shows the comments received by people in favour of the objective

Theme	Number
Other priorities	4
Treat equally	3
Terminology	2
Communication	2
Agreement	2
Finances	1

4 of those who agree with the objective mentioned other priorities, some inequalities such as those without homes and social class, older people and less healthy people etc should also be considered.

- This should include the inequalities by race, religion AND class

3 comments referred to equal treatment, comments refer to the most vocal groups within the community., bullying and everyone regardless of characteristics being given opportunities.

- Everyone should have the opportunity to be their best, most healthy and live a long productive life with the chance of a good education and a job based on ability.

2 of those responding were unsure what Marmot is or felt that others wouldn't know.

- I don't think the majority of Coventry citizens actually know what a Marmot partner is.

Communication was mentioned by 2 respondents in favour of the objective. Giving information about Marmot principles and reducing prejudice were mentioned under this theme.

- Need to get the principles of Marmot out into the community

A commitment to Marmot principles and the difficulty in achieving the goals were mentioned by the people in agreement, with suggestions that this is difficult to achieve with some groups.

For those who said they were not in favour of this objective the table below shows the themes for the comments received.

Theme	Number
Terminology	7
Communication	2
Treat equally	1
Finances	1

Terminology received the most comments among those who were not in favour of the objective. Some referenced a waste of money and did not understand what Marmot meant.

- I have no idea what a Marmot is in the context - other than a herbivorous squirrel-type animal. However the fact that Coventry Council appears to be a Partner to something implies it has yet again cost the tax payer money.

2 comments came under the communication theme and suggested that there was no context around this.

One mentioned treating people equally while another talked about finances.

- All communities should be treated equally

Is there any information that you think would help deliver these objectives or any other comments you would like to make?

This question received 27 comments.

The comments are themed below:

Theme	Number of comments	Quotes
Inclusive communication	11	<p>I think it is important to understand your audience otherwise this consultation feels like a tick box exercise. It is important to have a range of options to participate as you are already excluding people from the process.....</p> <p>Don't lecture, engage with people. Allow people to question as at the moment it feels like if you raise a concern or question something you are immediately labelled as a fat right nutter</p> <p>You assume the objectives need delivering, by the way you have framed this question.</p>
Focus for all	4	<p>Benefits and targets should be for ALL people regardless of which community, race, religion, colour, belief, sexuality, ability they hold ... certainly, it should ensure that no group is favoured above any other</p> <p>Like any business, your priority should be to support the majority of your paying customers. Then if you have spare capacity/ resource, then chase your dreams</p>
Work differently	3	<p>Yes - recognise true need and not just those objectives that are politically attractive.</p> <p>Engage antiracist organisations like BRAP to help council start talking about issues that are not talked</p>

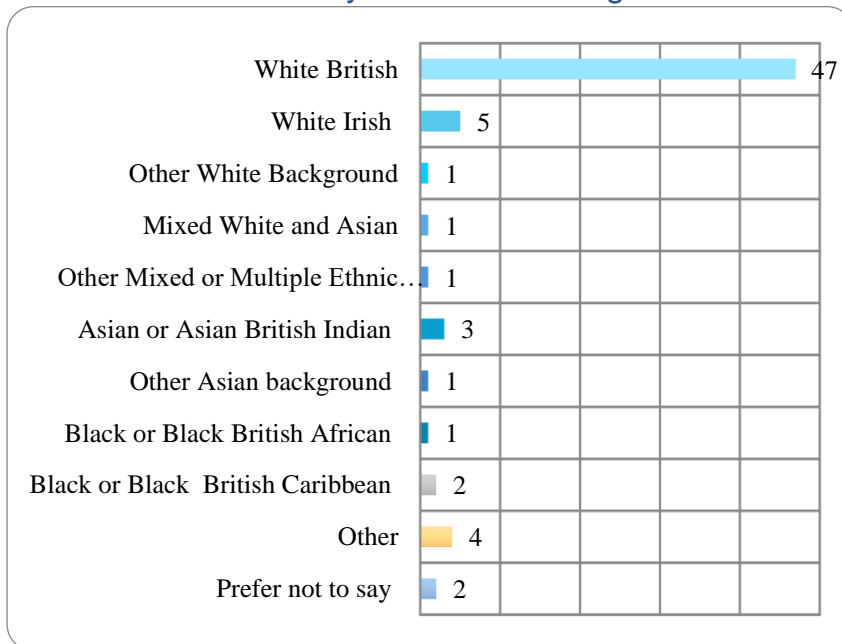
		about. We just had far right riots is it not time to at least start using the word racism in our vocabulary.....
Financial impacts	3	Street lights are off and brown bin waste paid for on top of extortionate council tax and the council drives this clap-trap. You lot need to get real and stop spending other peoples money on employing staff that drive these kind of projects. Sack them and save some of our cash  I think the amount of tax payers money being used in projects which only increase division is a disgrace
Transparency and detail	3	There are many other more pressing priorities the Council should be focusing on.  These proposals are wholly abstract and vague so anyone reading them will no idea what they mean or what in detail they will entail or require of the ordinary citizens and financially in their implementation. Therefore they are largely meaningless.
Other	3	Yes, I would like to see equality impact statements against each and ALL protected characteristics, for any initiative going forward and for them to be promoted and highlighted on all your promotional materials....  My husband is wheelchair bound and has great difficulty mobilising around the area due to barriers in place and thoughtlessness of other road and pavement users

How would you describe yourself?

How would you describe yourself?	
Male	32
Female	31
In another way	2
Prefer not to say	3

68 people answered this question with an almost equal number of males and females, 2 people said they identify in another way and 3 did not wish to state their preferred gender.

### Which best describes your Ethnic Background?



This question was answered by 68 respondents. 78% of those responding said they identify as White, this includes the largest group White British making up 69% of those responding to the survey. From those who were not in this group the largest amount of responses (3) were those from the Asian/ British Indian ethnic background.

### What is your sexual orientation?

What is your sexual orientation?	
Asexual	1
Bisexual	5
Gay man	3
Heterosexual/ Straight	43
Queer	1
Other	3
Prefer not to say	10

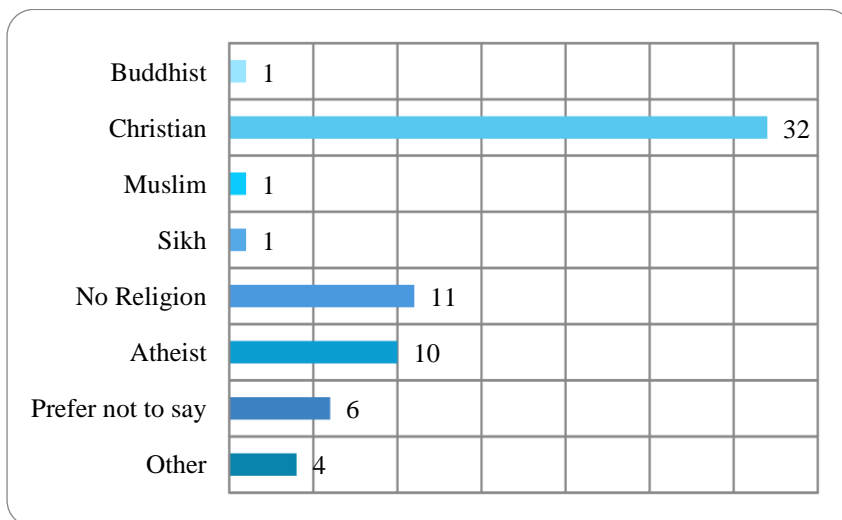
Most of the 66 people who responded to this question (65%) said they identify as heterosexual.

### What age group are you in?

What age group are you in?	
16 - 24	3
25 – 34	6
35 – 44	7
45 – 54	13
55 – 64	17
65 – 74	11
75 – 84	8

Of those 65 respondents who answered this question, the largest number 26% are within the 55 – 64 age group.

### Do you consider yourself to be?



Most of those who responded to this question identify as Christian, this is just under half of all respondents who answered this question.

### Do you consider yourself to have any disabilities or long-term conditions?

Do you consider yourself to have any disabilities or long-standing health

issues?	
Yes	39
No	27

66 people answered this question. 59% of these said they have a long term condition or disability.