

Ealing Affordable Housing Programme EDI Action Plan

This paper sets Ealing Council's response to the Greater London Authority's (GLA) Affordable Homes Programme 2021-26 requirement to advance equality, diversity and inclusion (EDI) as a condition of receipt of funding from the GLA. The programme requires the council to meet a set of minimum standards as well as proposing an action plan that shows how EDI will be advanced by the Council.

Fighting inequality is one of the council's three highest level strategic priorities. This sets out the ambition to; "create a borough where we work hard to address inequalities in all its forms, to ensure that no-one is left behind in terms of achieving their potential. Crime and antisocial behaviour is dealt with effectively so residents feel safe". As such decision making is framed around the recognition of needing to address inequality and projects across all areas of the council need to demonstrate how they do this. The Council Plan 2022-26 sets out specific commitments to address inequality. There is a particular focus on the issue of racial inequality within the borough. An example is the aspiration to rebalance the council work force profile in terms of ethnicity to better reflect the community profile. Good quality affordable homes are a key part of delivery towards this priority. The provision of genuinely affordable homes with a target to deliver 4,000 such homes by 2026 is a key plank of delivering on addressing inequality. The delivery plan is monitored quarterly and this includes specific monitoring of progress towards achieving the target of 4,000 genuinely affordable homes.

Five minimum equality, diversity and inclusion standards

Minimum equality, diversity, and inclusion standard	Confirm minimum standard continue to be met
All investment partners must offer equality, diversity, and inclusion training for all employees	Yes (please see Objective 1, Implement the recommendations from Ealing's Race Equality Commission report in full)

Minimum equality, diversity, and inclusion standard	Confirm minimum standard continue to be met
All investment partners must implement a zero-tolerance approach to all forms of discrimination, harassment and bullying	Yes (please see Objective 1, Implement the recommendations from Ealing's Race Equality Commission report in full)
All investment partners must broaden recruitment channels and encourage applications from diverse and underrepresented groups	Yes (please see Objective 1, Implement the recommendations from Ealing's Race Equality Commission report in full)
All investment partners must collect and monitor workforce data to benchmark the diversity of their workforce against the London benchmark	Yes (please see Objective 1, Implement the recommendations from Ealing's Race Equality Commission report in full)
All investment partners must publish their gender and ethnicity pay gaps	In progress and will be uploaded in the new year

Theme 1: Organisational equality, diversity and fairness

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
Implement the recommendations from Ealing's Race Equality Commission report in full	December 2020 Race Equality Commission set up. Report – Do Something Good	<p>There are 4 housing demands and actions each under priority 6 of the Race Equality Commission report.</p> <ul style="list-style-type: none"> Demand 1. The Council should empower tenant groups and place them at the heart of both new and existing developments 	Cabinet report published Nov 22 on progress against the Equalities Commission's recommendations.	Delivering on all recommendations in the report and reviewing actions with staff and wider community

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
		<ul style="list-style-type: none"> • Demand 2. The Council should run a campaign with tenants in the private sector to promote a greater awareness of their rights, where to go for support and advice, and how to hold bad landlords to account • Demand 3: The Council should establish hubs accessible to people in each ward where people can go to get advice and support specifically for housing queries • Demand 4: We urge the Government to change the law to allow councils to continue the work started during the pandemic to end rough sleeping. <p>The demands, including the 4 housing demands above under priority 6: Housing, have been embedded in the Council plan and annual performance monitoring. Council Plan performance reports are reported to Cabinet and published on the council's website.</p> <p>Each have of the four housing demands above have actions listed in the Nov equalities progress update Cabinet report and have been progressed with the Equalities Housing Sub-group which has an independent chair. The Race Equalities housing sub-group will be engaged to support the</p>		

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		<p>development of the council's new housing and homelessness strategies.</p> <p>A significant level of work around Equality Diversity and Inclusion (EDI) is being driven through the council's EDI Action Plans. The plans pay particular attention to the council's recruitment process to ensure they are fair and devoid from discrimination, that recruitment panels are representative of the community, identifies clear progression routes and will positively impact and complement areas of Ealing Race Equality Commission's "ask" on representation and progression of employees to reflect Ealing's demographics. For example, recruiting more from the age range 16-24yrs (the council profile is 2.4% when compared with the community 10.9%),</p> <p>At an organisational level, activities are consolidated into our corporate EDI action plan and covers a number of themes including:</p> <p>Equalities, Diversity & Inclusion Training:</p> <ul style="list-style-type: none"> • New staff: All new staff must complete EDI training within four weeks of the start of their employment. This measure is currently at 80%, with the aim of increasing to 100%. 	March 2024.	All new staff and managers will have completed mandatory EDI training

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		<p>Over the past few months the HR/OD have implemented robust measures to ensure that the monitoring/reporting of completion rates is high priority - rates have improved since the last update to 90%- January 2024 the council's HR/OD team will be launching a campaign instructing all staff to complete their mandatory EDI training by 31st March 2024.</p> <ul style="list-style-type: none"> • All management must undertake mandatory EDI training. Currently, 58% of managers have completed courses. The target is that 100% of managers will have completed all EDI training by 31st March 2024. • A re-launch of EDI training is planned for all existing staff to ensure completion is accurately recorded and their knowledge is up-to-date. In January 2024 the council's HR/OD team will launch the campaign instructing all staff to complete their mandatory EDI training by 31st March 2024. We have set a target of 100 % completion by this date. <p>The following training courses are currently available to staff and have been updated on various dates since at least 2015, the newest</p>	<p>March 2024.</p> <p>March 2024.</p>	<p>E-learn platform to be established to enable mandatory training of all existing staff.</p>

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		<p>content in bold below was launched October 2021; since this time we have recorded over 2,100 staff accessing our EDI courses/intervention. As a result of our more recent process interventions and re-launch we expect completion rates to increase to 100% by 31/3/2024:</p> <p>Mandatory for all staff</p> <ul style="list-style-type: none"> Equality in the workplace (eLearn) <p>Mandatory for managers</p> <ul style="list-style-type: none"> Recruitment and Selection Training (for hiring managers) Interrupting Bias (face to face) Cultural Competence (face to face) <p>Optional to all</p> <ul style="list-style-type: none"> Equality Diversity Inclusion (face to face) Equality Analysis Assessment (face to face) Unconscious Bias <p>In addition to the above EDI training we also sign post to additional EDI resources/references which includes TED Talks and our reading list.</p> <p>EDI training is designed to support the council's commitment to tackling inequality by impacting and improving staff awareness and understanding of EDI, to enable the development of effective processes for our staff and services for our communities. As part of our success measures we</p>	<p>Dec 2023</p> <p>January 2024</p>	<p>Formal adoption of new EDI Policy</p>

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		<p>have identified the following KPIs related to pay which are also reported to London Councils:</p> <table border="1"> <thead> <tr> <th>Performance Indicator</th><th>Polarity</th><th>Performance 2021/22</th><th>Performance 2022/23</th><th>Target 2023/24</th></tr> </thead> <tbody> <tr> <td>Mean disability pay gap within the Council</td><td>Smaller is better</td><td>4.4%</td><td>1.9%</td><td>3.5%</td></tr> <tr> <td>Mean ethnicity pay gap within the Council</td><td>Smaller is better</td><td>14.8%</td><td>12.7%</td><td>14.0%</td></tr> <tr> <td>Mean gender pay gap for council employees</td><td>Smaller is better</td><td>6.1%</td><td>4.3%</td><td>3.6%</td></tr> <tr> <td>Percentage of the top paid 5% of local authority staff who are female</td><td>Bigger is better</td><td>47.2%</td><td>49.1%</td><td>49.5%</td></tr> <tr> <td>Percentage of the top paid 5% of local authority staff who are from an ethnic minority</td><td>Bigger is better</td><td>16.2%</td><td>24.5%</td><td>25.0%</td></tr> <tr> <td>Percentage of the top paid 5% of local authority staff who have a disability</td><td>Bigger is better</td><td>2.4%</td><td>3.9%</td><td>6.0%</td></tr> </tbody> </table> <p>Additionally, EDI priorities are also identified and reviewed by directorate leadership teams.</p> <p>Over the years, we have also commissioned adhoc EDI training sessions on Menopause, Andopause and Mental Health and Wellbeing. We are committed to enhancing the breadth and scope of the EDI Training we offer in support of all protected characteristics. We are finalising the details on our new EDI content which includes topics on Race, LGTBQ and Transgender awareness, Neurodiversity, Allyship, Mens Mental Health to name a few.</p>	Performance Indicator	Polarity	Performance 2021/22	Performance 2022/23	Target 2023/24	Mean disability pay gap within the Council	Smaller is better	4.4%	1.9%	3.5%	Mean ethnicity pay gap within the Council	Smaller is better	14.8%	12.7%	14.0%	Mean gender pay gap for council employees	Smaller is better	6.1%	4.3%	3.6%	Percentage of the top paid 5% of local authority staff who are female	Bigger is better	47.2%	49.1%	49.5%	Percentage of the top paid 5% of local authority staff who are from an ethnic minority	Bigger is better	16.2%	24.5%	25.0%	Percentage of the top paid 5% of local authority staff who have a disability	Bigger is better	2.4%	3.9%	6.0%	Q4 2024	Formal adoption of Grievance Policy incorporating zero tolerance approach.
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		<p>Adopting a Zero Tolerance approach to all forms of discrimination, harassment & bullying:</p> <p>Ealing's current Equality & Diversity Policy includes a clear statement that the council do not tolerate discrimination in any form. Although the term 'zero tolerance' is not specifically used, the policy uses a different style of language that states:</p> <p><i>The Council is determined to maintain equality and fairness of treatment in all their dealings with employees and the public. It is a condition of employment that all employees adhere to this policy. The Council's code of conduct sets out expected standards of behaviour for its workforce. Any deliberate act of discrimination or serious breach of the Equality & Diversity Policy by employees will be considered as an act of gross misconduct and will result in disciplinary action, and possible dismissal.</i></p> <p>It is recognised, however, that this policy requires updating to reflect current good practice. Following a policy review, Ealing's commitment to zero tolerance is being taken forward by incorporating the present Dignity at Work policy (that includes expected responsibilities, behaviours and conduct)</p>	Q4 2024	

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
		<p>within the Grievance Policy. This includes a specific reference to a zero tolerance approach. The zero tolerant statement has now been published.</p> <p>Broadening Recruitment Channels:</p> <p>Ealing Council currently uses the following recruitment channels:</p> <ul style="list-style-type: none"> • Social media, including LinkedIn. Managers and staff share opportunities with their networks. • Working in partnership with specialist recruitment agencies like Penna to help source diverse candidates using appropriate specialised media • Recruitment fairs with LSP and employment partners. • Youth apprenticeship & recruitment fairs with local schools and colleges. • Council apprenticeship scheme: Since April 2018, we've worked closely with training providers and local businesses across the borough to create almost 800 apprenticeships. • Levered-in local labour and apprenticeships via contractual commitments. 		Introduce new diversity recruitment channels

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
		<p>Moving forward, the council plans to increase diversity of recruitment through:</p> <p>Working in partnership with specialist agencies and organised recruitment fairs to target candidates under-represented groups such as LGBTQ, Disability and BME.</p> <p>Working with local SMEs to help improve links with school and college leavers.</p> <p>Following the success of our pilot Mentoring Scheme we have launched the new Inclusive Mentoring Scheme across the council</p> <p>Our SEND team plan to work even more closely with the local Job Centre Plus, placing disabled job seekers.</p> <p>These channels encourage applications from diverse and under-represented groups. The channels in use are currently reported to and monitored by the council's EDI leads for the workforce and communities and SLT.</p> <p>Collection, Monitoring and Publication of workforce data to benchmark diversity against the local area of the organisation:</p>	March 2024	

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
		<p>In relation to gender, Ealing has published a comprehensive report annually since 2018. The latest gender pay gap report, was published for 2022. The mean pay gap has reduced from 8.6% in 2018 and now stands at 6.1%, the same as reported for 2021. The median pay gap has decreased from 4.3% in March 2021 to 3.4% in March 2022, thus showing sustained progress. The pay data is benchmarked with other London Councils</p> <p>Ealing collates comprehensive workforce diversity data covering: age, ethnicity, gender. Data for 2022 will be uploaded on the public website by 31/12/2023, and is attached separately. This data is also currently benchmarked against Census data for the whole borough</p> <p>Ealing Council will continue to monitor any differential in pay between men and women, and ethnicity, in the organisation annually in conjunction with the agreed KPIs and annual review of the Pay Policy Statement. A focus on gender and ethnicity pay gap will continue to form part of the work on our Equalities, Diversity and Inclusion policy and working with our Staff Equality Groups.</p>	December 2024	Publish benchmarked workforce diversity and pay gap data

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
		<p>The council recognises that it is best practice to benchmark and publish workforce diversity data. Workforce ‘dashboards’ have been implemented internal to the organisation to allow up-to-date data to be captured and benchmarked. The dashboard is already available to the Senior Leadership Team (SLT) and high-level workforce data will be made available to all staff by 31/3/2024.</p> <p>The council intends to publish workforce diversity information, and pay gap data, by the end of 2024.</p>		
Use the Mayors Good Growth by Design Handbook to promote supporting diversity and inclusion in the built environment disciplines	Broadway Living have produced the Broadway Living Design Guide as a brief for the Development of affordable new homes in the borough. This has 22 specific objectives and embraces the objectives of the Mayors Good	<p>Ealing fully endorses and embraces the Mayor’s Good Growth by Design Handbook and this has helped to build and shape our development objectives and activities. These include:</p> <p>Review the social value delivered on all projects to measure achievements and shortfalls, and continually upgrade requirements on future projects.</p> <p>Reinforce the requirement for mentoring initiatives and educational outreach programmes. Access harder to reach the groups for work opportunities.</p>	<p>Dec 2022</p> <p>Dec 2022</p>	Build even stronger links with the community, endorsing co-design of schemes

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
	<p>Growth by design Handbook.</p> <p>Havelock Regeneration. Accessed funding to create community facilities out of disused garage spaces, reaching out to underrepresented and excluded sectors on the estate to support and mentor. Model to be rolled out on other regen schemes.</p> <p>Social value requirements are embedded in the procurement of all our</p>	<p>Involve local school children in the design of all play spaces on projects.</p> <p>Forge closer links with University of West London, based in Ealing. Develop mentoring programmes, lunchtime talks, placements etc.</p> <p>Encourage “established practices” to sub-contract smaller, younger firms/ firms led by underrepresented groups to broaden diversity of the project team.</p> <p>All schemes over 50 units to go before a design review panel to include Mayors Design advocates, residents and stakeholders.</p> <p>Strong links with community endorsing co-design of schemes.</p> <p>How we are measuring this: Broadway Living Development Guide 2021 Objective 4.4: Community satisfaction</p> <p>We aim to deliver well-designed and well-built homes with no snagging and build issues during occupancy. We want residents to be happy with their homes, proud of their communities, and</p>	<p>Dec 2022</p> <p>March 2023</p> <p>Dec 2022</p> <p>Nov 2022</p>	

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	<p>consultants and contractors. We have employed KCA on our Lexton/Steys project who have developed a bespoke programme with the Stephen Lawrence Charitable Trust.</p> <p>A “resident sounding board” has been set up for Gurnell Redevelopment comprising residents and stakeholders, to input into the strategic redevelopment of this leisure and residential site.</p>	<p>willing to take care of the buildings and places that form their neighbourhoods.</p> <p>We will measure this through:</p> <ul style="list-style-type: none"> • Monitoring delivery of social value in contracts and seeking feedback from residents • An enhanced commissioning and handover process with greater management and design team involvement to minimise issues for residents in year one • Ensuring zero-snagging after handover • Providing a resident and wider community questionnaire after nine months of occupancy, targeting a better than 90 per cent satisfaction rate • Conduct detailed interviews or create a residents’ focus group after one year of occupation • In year two of use, carry out a post occupancy review of the residents’ questionnaire, interviews and building performance data; provide feedback to all stakeholders - residents, the design team and the contractor - to ensure improvements in future developments. 		

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
	<p>The council is working towards all schemes having a resident survey after 12 months of occupation. Questions will specifically address equality, diversity and inclusion.</p> <p>Resident consultation on all schemes prior to planning applications.</p>	<p>What will the successes of measure be next year?</p> <ul style="list-style-type: none"> • Commencing post occupancy review on schemes as they complete. • Assembled design teams on projects over 50 homes to include at least one 'diverse-led' enterprise and a specialist in community-led design and engagement. <p>Broadway Living Development Guide 2021 Objective 2.9: Designing with residents We want to empower and instil a sense of ownership and control among residents, so they feel proud of their homes and communities. Helping residents become actively involved in the design of their homes is one way of achieving this, while good urban design informed by local knowledge and that allows communities to easily care for their homes and neighbourhoods, is another. We will:</p> <ul style="list-style-type: none"> • Implement resident engagement and consultation before design proposals are considered • Mix methods of consultation with online and onsite consultations targeting a diverse range of backgrounds and ages • Collect feedback and findings from previous developments the team has delivered 		

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
		<ul style="list-style-type: none"> • Hold a series of co-design workshops with residents and local community organisations and services throughout the design process • Ensure the Ealing Community Review Panel is engaged in the design of consultation and engagement activities as well as providing feedback on designs themselves. 		

Theme 2: Sustainable and diverse supply chains

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
Adopt procurement methods that encourage suppliers to reduce their environmental impact, including certification to independent environment	Ealing Council is committed to reducing its carbon footprint with a target of net zero by 2030.	<p>The council has been working in collaboration with eight west London authorities to develop a consistent approach and coordinated effort to help reduce our carbon footprint. Through this collaborative effort and following extensive market engagement, a Low Carbon Procurement Policy and Toolkit has been developed and implemented for use on applicable procurements.</p> <p>Consideration of sustainable impacts and issues are standard requirements which form part of our internal procurement Gateway Reviews and are</p>	Actioned	Environmental impacts are considered in the Social Value Matrix referred to under the next objective

accreditation schemes		<p>accounted for in Project Initiation Document (PID) required for all contract of £75,000 and above.</p> <p>Low carbon toolkits are published and made available through the councils intranet pages.</p> <p>The requirements will be proportionate to each contract, measurable and form part of the contract KPIs where feasible. Outcomes will be monitored and reported to the Leadership and Cabinet on a regular basis by the Council's Commercial Hub.</p>		
Adopt procurement methods that evaluate 'social value' or 'EDI' as a scored quality criterion when commissioning work.	The Council's Social Value Policy launched in February 2022 includes our commitment to EDI across our trading relationships.	<p>Increasing the proportion of contracts and opportunities available to a wider more diverse audience of businesses and employees –</p> <p>The initial baselines for assessment are developed and tailored on a project-by-project basis in coordination with the commercial hub team and in consideration of several factors including project location, education and training shortfalls, existing unemployment figures, immediate ethnicity demographic, and opportunities for those with additional needs (physically disabled and those with learning difficulties).</p> <p>Project teams currently work to identify whether there are opportunities in the contracting approach to involve the local community and businesses and embed them within the supply chain. This includes an assessment of local Small and Medium Enterprises (SMEs) on the council's existing</p>	Actioned	Increase the proportion of contracts and opportunities available to a wider more diverse audience of businesses and employees

		<p>procurement system, but also considering regional frameworks, which are open to local suppliers.</p> <p>Assessment of qualitative evaluation criteria has previously been amended to score organisations approaches to ensuring diversity in their workforce as well as providing benefit and opportunities to hard-to-reach groups in the community. Social Value Matrices are now mandated to be included within assessment criteria for every contract the council advertises over £75,000, but benefits are now also being considered for lower value contracts as part of a Request for Quotation (RFQ) process. The social value scoring for each scheme is always tailored to ensure specific area related commitments are made. The performance is then measured from contract award to completion.</p> <p>Moving forward, success of this evolving strategy will be measured collectively, but primarily using a Themes, Outcomes & Measures (TOMS) analysis framework which assesses the achievements realised against the social value outcome targets, pre-contract. The measurement of success will consider the benefits to the people who were first identified as part of the Equalities Analysis Assessment (EAA) at project initiation stage.</p> <p>Further improvements are now expected, with the Council developing a new engagement framework which is expected to be adopted in early 2024 under the 'Ealing for Everyone' pledge. The</p>	Q1 2024	
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		framework will set the terms of engagement with identified under-represented and minority demographics and enable them to be co-contributors to design processes and contract awards, as opposed to only being consultees previously. The aim of the framework is to dictate how decision making will be progressed and ensure residents and key stakeholders are driving decisions being made, rather than simply being notified of them. It also encourages an improved sense of community ownership over assets and spaces, empowering residents to feel they are leading on decision making.		
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Theme 3: Working together with Londoners

Objective	Current position / Baseline Action	Action / Task	When	Measure of success
Ensure that residents' voices are represented in governance and decision making	The Council Plan Priority - Thriving Communities	Work is progressing on the resident engagement structure and the strategy's implementation, although the strategy hasn't been signed off at this stage because the approved structure (e.g. the residents forum) is not formally in place. Work is also underway on a service improvement plan and comparison against the consumer standards-these are attached.	December 23	Full engagement framework implemented by the end of December.
Take a meaningful and	Housing Regeneration	Planning for affordable homes (generally)	Immediate implementation in	

<p>participatory approach to working with diverse community groups and organisations when designing and delivering affordable homes</p>	<p>undertake ballot of residents on all housing regeneration schemes and ensure that the Council promotes residents' forums and Board membership to encourage diverse residents forum and encourage under-represented voices to be heard in a safe space.</p>	<p>Set up steering groups with ward councillors and residents who are interested in taking a leading role. These steering groups will agree on the approach to the Town Forum in each of the seven towns to prepare for launch in Autumn</p> <p>Set aside initial funding for projects to be developed by the Town Forums until the council has adopted the Community Infrastructure Levy (CIL)</p> <p>In relation to Housing Regeneration programmes:</p> <p>Extensive resident consultation takes place throughout the decision-making process ahead of any decision to regenerate an estate, and this includes:</p> <ul style="list-style-type: none"> • Establishing resident steering groups comprising elected resident representatives where there is a recognised TRA. All existing TRAs must comply with the council's existing requirements in relation to inclusivity and wider representation. • Examination of Ward and LSOA data to determine minority breakdown of the estate, to guide and steer consultation methodologies, and to ensure inclusive representation. This forms part of the Equalities Analysis Assessment process for all regeneration schemes. 	<p>Housing Regeneration Schemes</p>	
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		<ul style="list-style-type: none"> • Interrogating housing management data to extract information relating to households that have been flagged by housing managers as not having English as a first language. • Providing translation panels on all printed materials to request more information in up to seven community languages. • Ensuring that bespoke websites for regeneration programmes are readable for non-native English speakers via Google Translate. • Where residents have agreed to recruiting an Independent Resident Advisor, that this service also has access to translators of all the identified community languages. • Ensuring the Consultation Plans for the development of each regeneration programme include proactive measures to engage minority residents, such as visiting local places of worship, community cafes and other diaspora meeting places. • Specifically in relation to the ballot process: <ul style="list-style-type: none"> ○ The council Offer Document is available in all the key community languages ○ Staff speaking a wide range of community languages are available to explain and answer questions ahead of the ballot taking place ○ Updates from the ERS at milestones during the ballot process allow staff to visit residents at home to determine if any further information is required to enable the resident to cast their ballot. 		
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		<ul style="list-style-type: none"> ○ We are currently investigating the possibility of including a self declaration survey as part of the online and postal ballot process to analyse the profile of voters in order to identify where there may be issues with specific groups. 		
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