



ADUR & WORTHING
COUNCILS

Our Equalities Policy

June 2023 Update

1.0 Our Equality Statement

- 1.1 Adur District and Worthing Borough Councils (hereafter referred to as “the Councils”) are committed to increasing inclusion and providing equality of opportunity in all our activities and to ensuring that discrimination does not occur.
- 1.2 We will strive for a workforce that reflects the diversity of the local community in order that our services are provided appropriately and the Councils benefit from a wealth of experiences.
- 1.3 The Councils will involve the wider community in our decision-making processes and use our influence to progress equality and inclusion issues in the Adur District and Worthing Borough.
- 1.4 To achieve our vision for inclusion and equality we will lead by example, we will listen to our communities and we will seek to work in collaboration with others. The Council has adopted a new corporate plan called [Our Plan](#) where we set out our purpose which is to provide good and lasting stewardship for both Adur and Worthing, so that people and places can thrive. In the plan we describe our ways of working which includes being inclusive and kind. To achieve our purpose we have adapted three new principles (described below) enabling the councils to develop and deliver inclusive services by listening to underrepresented voices, creating equal access and meeting our equality duties.

Scope and Review

- 1.5 This is a council-wide policy that outlines our equalities commitments to our employees, members and residents.
- 1.6 This policy will be reviewed and updated annually.

Legislative Framework

- 1.7 The Council Equalities Policy sets out the measures the Councils are taking to meet the requirements of the Equality Act 2010 (hereafter referred to as “the act”) and other legislation bringing together all previous equality legislation.
 - o Equality Act 2010
 - o Human Rights Act 1998
 - o Equal Pay Act 1970 (as amended)

Protected characteristics

1.8 The characteristics that are protected in relation to the public sector equality duty are:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race
- religion or belief
- sex and sexual orientation

Marriage and civil partnership are also protected characteristics under the Equality Act, but it is not covered by the Public Sector Equality Duty.

2.0 The General Equality Duty

2.1 Those subject to the Equality Duty as set out in the Act must, in the exercise of their functions, have **due regard** to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- 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
- Remove or minimise disadvantages suffered by people due to their protected characteristics
- Take steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encourage people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

What are the benefits of the Equality Duty?

2.2 Compliance with the General Equality Duty is not only a legal obligation, but the Councils believe it is the right thing to do for our residents and that it makes good business sense. An organisation that is able to provide services to meet the diverse needs of its users should find that it carries out its core business more efficiently. The Councils believe that a diverse workforce draws on a broader range of talent and better represents the community that we serve.

2.3 Adur & Worthing Councils are focused on what is practical: not templates or paperwork for the sake of them, but a genuine focus on real impact. Our goal is a safe and inclusive environment where everyone can thrive. To achieve the councils'

purpose and deliver our equality ambitions we have adapted three new principles: i) we are resilient ii) we are adaptable and iii) we are participative. Our participative principle seeks to drive and support our equality ambitions by:

- Involving people more closely in the design and provision of services
- Offer genuinely participatory ways for citizens to be involved in decision-making
- Provide inclusive services by listening to underrepresented voices, creating equal access and meeting our equality duties.

2.4 As Councils, we are clear that our role is to enable individuals and communities to flourish and prosper. We seek to support communities to be resilient, creative, well connected, adaptive to changing circumstances and have the ability to provide resources to each other. In future interactions of our policy we will seek to develop the link between inequality and poverty.

3. Previous Objectives and Delivery Plan

- 3.1 A progress update on the plans set out in 2020 is provided in Appendix 1.
- 3.2 In general terms we have made some good progress in working toward our Equality Objectives and we have used this experience to develop the updated interim objectives described below.

4. Interim Equality Objectives

- 4.1 This part of the policy sets out our interim equality commitments. It guides the work of all employees and elected members in the Councils as we deliver public services. Public authorities are legally required to set at least one equality objective every four years and the commitments set out below will enable a consistent focus on achieving greater equality and inclusion in Adur and Worthing.
- 4.2 The councils will work to the following four interim equality objectives to help drive equality and inclusion across all areas of their work, as well as demonstrate compliance with the Public Sector Equality Duty. This programme is fully aligned to the original policy's commitments and is described as an interim plan as we anticipate a fuller update of the policy.
- 4.3 The objectives will be overseen by the Equality Leads, the Director for Housing and Communities and the Director for Sustainability & Resources, supported by the Assistant Director for People and Change and the Equality Champions delivery group. Additional specialist equalities support will be identified, for example training, where and when this is needed.

Objective 1: We will improve our understanding of Adur & Worthing's diverse communities and use this knowledge to shape and improve policy and practice, helping the councils to reduce disadvantage and meet the needs of protected groups.

How we will do this:

- Improve the collection and analysis of quantitative and qualitative information to inform and shape decisions on different equality groups.
- Work with our residents and partner organisations, including the voluntary, community and faith sectors, to ensure we use our community intelligence, data, and knowledge to deliver joined up policies and practice.
- Further embed and improve our Equality Impact Assessment practice to ensure our decision making and policy development work supports and promotes our equality duties.

Objective 2: We will enhance our leadership role, developing partnerships and demonstrating organisational commitment to equality, diversity and inclusion in Adur & Worthing.

How we will do this:

- Develop visible leadership that ensures equality is reflected in corporate reporting, service planning and target setting. Additionally, adopt and promote a zero-tolerance approach to discriminatory behaviour.
- Measure and share our progress and achievements.
- Support and develop our Equality Champions Group, Disability Group and staff equality workers forums.
- Support councillors in their work of representing and championing the interests of residents, communities and businesses.
- Foster good relations and mutual respect across people of all faiths and none, supporting events such as International Holocaust Remembrance and opportunities for interfaith dialogue.
- In addition, we will seek to promote good relationships and support opportunities between people who share protected characteristics and those who don't through the equality calendar, supporting for example Pride and Pride Month, Black History Month and International Women's Day.
- We will work with our Community Safety Partnerships to address discrimination, harassment and hate crime in our places.
- Undertake a collaborative process with staff, Members, the community and partners in the development of a new Equality Policy for Adur & Worthing.

Objective 3:

As part of Our Plan and our Participation Principle, we will work to improve the involvement of our diverse communities in public life, putting people at the heart of decision-making and service delivery, reducing disadvantage and better meeting the needs of protected groups.

How we will do this:

- Offer genuinely participatory ways for citizens to be involved in decision-making, ensuring communities who are often excluded are supported in their participation.
- Provide inclusive services by listening to underrepresented voices and creating equal access. As part of this we will seek to improve organisational capabilities around person centred and trauma informed work.
- We will ensure that our buildings are fully accessible and where this is not practical we will provide reasonable alternative methods of access so no one is

discriminated against by physical barriers. We will also apply this principle to digital and online engagement and service provision.

Objective 4: We will build an inclusive organisation where the workforce reflects the places we serve and the needs of all residents, and where colleagues feel confident about being themselves at work.

What we will do:

- Provide mandatory training plus additional, specialist learning opportunities and guidance to all staff regarding the Equality Duty. As part of this, provide training on the Equality Impact Assessment Toolkit to council officers involved in policy development and service management.
- Reduce the proportion of 'unknown' equality data we hold on our employees.
- Work towards a workforce that reflects the diversity of the local community to fully utilise their skills and abilities and take positive action where appropriate to encourage underrepresented groups into our workforce.
- Through our policies, including our Anti Discrimination and Harassment Reporting Policy, we will seek to address and reduce discrimination, harassment and victimisation in the workplace. We will work with our recognised unions in addressing any issues raised.
- Work with our staff networks and equality champions to better understand and respond to the needs of our diverse staff.
- Maintain our commitment to the Disability Confident Employer Scheme and take the required action to improve how we recruit, retain and develop disabled people.
- We will promote flexible working practices ('blended working') in recognition that many of our employees have caring responsibilities.

5 Monitoring:

- 5.1 Monitoring is a way of checking that no one is being treated unfairly in our employment practices or in our service delivery, to find out if our policy is working, if any remedial action has been effective, or if additional action is required. This policy and an associated action plan is being overseen by the Equality Leads (the Director for Housing and Communities and the Director for Sustainability & Resources) supported by the Assistant Director for People and Change and the Equality Champions delivery group. Further monitoring arrangements are undertaken by established service and corporate reporting mechanisms including the Corporate Risk Register and Service Planning and Mission Road Maps.
- 5.2 The Councils have introduced the use of an Equality Impact Assessment (EIA) approach to help understand and guide service and policy reviews. A revised approach was produced, trialled and reviewed in 2021 and has now been adopted.
- 5.3 Employees are asked to supply information about themselves so we can identify how representative our workforce is of the wider community and we will also monitor job applicants. Employee training and promotion will be monitored to evaluate the effect of the policy. Monitoring information will be used in a strictly confidential way.

6.0 Putting the Policy into Action

- 6.1 Putting the policy into practice is the responsibility of all employees and Members. Both employees and Members must comply with both the spirit and wording of the policy. This policy is incorporated into every employee's terms and conditions of employment with the Council.
- 6.2 Day to day policy implementation is overseen by the Assistant Director for People and Change.
- 6.3 Assistant Directors and Heads of Service are responsible for ensuring that their services are delivered without discrimination. All managers are responsible for preventing discrimination and for setting a good example.
- 5.4 Members have responsibility for the policy and to set a good example.
- 5.5 The Adur and Worthing Equality Champions delivery group has specific responsibility for considering issues that arise from the policy.
- 5.6 The Councils will communicate the Equalities Policy and related policies to all potential and actual employees for example through the information we send out to prospective employees and through the induction of new employees.
- 5.7 An equalities page will be maintained on the Councils' website and contain relevant information on equality and diversity.
- 5.8 The Equalities Policy will be reviewed on an annual basis.

6.0 Learning and Development

- 6.1 Equalities training is mandatory for all employees to ensure they are made aware of their rights and responsibilities under this policy. Similarly there is an expectation that all Members will attend Equalities training.
- 6.2 Equality issues are an integral part of our training and development programmes, regardless of whether the council uses internal or external trainers.
- 6.3 In addition to the generic equalities training, tailored equalities training to reflect the needs of specific services will be encouraged, particularly for services engaging with external customers and / or where there is significant engagement with protected group(s).
- 6.4 The Councils make a strong commitment to training and development for all employees. All employees will have equal access to training and development and we will take appropriate positive action for those who are underrepresented in our workforce.

- 6.5 The Councils will explore the possibility of benchmarking their equality objectives against similar organisations, recording any lessons learnt in order that they can be built into future plans for ensuring compliance with the Equality Act.

7.0 Remedies

- 7.1 Employees who feel they have been discriminated against should refer to the Grievance Policy. Employees who fail to comply with the policy may be subject to the Councils' Disciplinary Policy.
- 7.2 Complaints from customers will be dealt with through the corporate complaints procedure.
- 7.3 The Councils have recently adopted a Discrimination and Harassment reporting policy where staff can report problems they have experienced or witnessed, and they can make these reports anonymously if required.

A copy of this policy can be made available in alternative formats, e.g. large print, by contacting:

- Human Resources: human.resources@adur-worthing.gov.uk

Appendix 1 - Progress in Delivering the Previous Commitments and Delivery Plan

Employment

Commitment	Action	Progress
<p>We will work towards a workforce that reflects the diversity of the local community to fully utilise their skills and abilities and take positive action where appropriate to encourage underrepresented groups into our workforce.</p>	<p>We will implement the new HR system in 2021 with a priority on collecting and analysing equalities data. Our recruitment process is being reviewed to ensure our workforce is representative of our community and we will take positive action where required. Target for completion of the plan is April 2021.</p>	<p>A new HR system is in place and we are starting to be able to collect equality data. Using this data, work has been undertaken and is ongoing to ensure our workforce better reflects the communities we serve.</p>
<p>No employees will be discriminated against in the areas of pay or conditions of service, access to training and development or promotion. We will maintain an up to date Dignity at Work Policy and Disabled Employees Policy.</p>	<p>The Grievance Policy, adopted in January 2018, has been expanded to include dignity at work and is due for review in January 2021. The Disabled Employee Policy is also scheduled to be reviewed in 2021.</p> <p>In 2021 the council will establish the Equality Champion's delivery group, where employees will have the opportunity to support, guide and monitor equality work in the authority and with the community.</p> <p>We will regularly consult with the relevant trade unions and our employees using a range of consultative structures and engagement methods. The Councils will keep these means of communication under review to ensure they are effective.</p>	<p>The Grievance Policy was reviewed in 2021 and is due for renewal in 2023. The Disabled Employee Policy is being reviewed and a draft has been shared with Unison for comment. key elements regarding our commitments to disability, including our support network, are included in the updated Staff Handbook.</p> <p>The Equality Champions delivery group has been established and meets regularly to support, guide and monitor equality work in the authority and with the community. We also have an Accessibility Group that is driving change with regard to access and disability.</p> <p>Engagement with our trade unions is ongoing and our internal communication around equality and diversity has been reviewed and improved.</p>

<p>We will promote flexible working practices in recognition that many of our employees have caring responsibilities. For more detail please refer to the Work Life Balance Policy.</p>	<p>Flexible working practices are in place and have evolved further during Lockdown where the pressure of parenting and caring responsibilities escalated for many employees. Overall feedback from employees was very positive about our approach. We will review and embed inclusive flexible working practices as part of our Workspaces review in 2021.</p>	<p>The council has continued to promote and support flexible working practices and in 2022, following staff consultation and an EIA process, adopted a Blended Working policy.</p>
<p>All employees are required to behave in non-discriminatory ways towards colleagues and the public and anyone who does not comply may be subject to disciplinary action.</p>	<p>We do not tolerate discriminatory behaviour towards colleagues and the public. We have robust processes in place to address any incidents of discriminatory behaviour and these will be strengthened through the update of the Staff Handbook and Grievance Policy in 2021.</p>	<p>The council has developed and is trialling a harassment and discrimination reporting tool when staff are able report concerns about unacceptable behaviour discrimination and harassment.</p>
<p>Putting the policy into practice is the responsibility of all employees and Members. Both employees and Members must comply with both the spirit and wording of the policy. This policy is incorporated into every employee's terms and conditions of employment with the Council.</p>	<p>To support implementation of the policy, regular updates will be provided. The testing, training and implementation of an Equality Impact Assessment (EIA) approach will support embedding of practice across the platforms. A particular focus will be the 'Effortless' programme and the Good Service standards, ensuring equalities issues are addressed in all change programmes as a matter of course.</p>	<p>Work is ongoing to embed good practice Equality, Diversity and Inclusion (EDI) practice across the councils, including the use of EIAs. A number of training sessions have been provided for managers and policy developers and these have been well attended.</p>
<p>The Councils will communicate the Equalities Policy and related policies to all potential and actual employees, for example through the information we send out to prospective employees and through the induction of new employees.</p>	<p>The Staff Handbook will be strengthened in 2021 to reflect the findings and language framing that is generated in the recruitment review. Our recruitment approach and our Staff Handbook will strongly demonstrate our inclusive culture.</p>	<p>The staff handbook has been updated and strengthened to better demonstrate our equality objectives.</p>

<p>Equalities training is mandatory for all employees to ensure they are made aware of their rights and responsibilities under this policy. Similarly there is an expectation that all Members will attend Equalities training.</p> <p>In addition, to the generic Equalities training, tailored Equalities training for specific services will be encouraged, particularly for services engaging with external customers and / or where there is a significant engagement with a protected group(s). All employees will have equal access to training and development and we will take appropriate positive action for those who are underrepresented in our workforce.</p>	<p>There is an Equality & Diversity and a discrimination e-learning module available, which is part of the induction process. The 1:1 record template includes tracking for completion of mandatory courses, but this will be strengthened in 2021 with a narrative prompt, again reflecting the language design from the recruitment review.</p> <p>A programme of focus sessions on different equalities issues will be developed in 2021, with an emphasis on lived experience from a range of guest speakers with video sessions recorded to enable the sessions to be watched “on demand” later by others.</p> <p>Member training will be reviewed in 2021.</p>	<p>EDI learning and development provision has been reviewed and updated including the provision of mandatory training and additional specialist learning opportunities, for example with regard to the LGBTQ+ community and the deaf community.</p> <p>EDI training for members has been reviewed and new induction and refresher sessions are provided annually.</p>
<p>Employees who feel they have been discriminated against should refer to the Grievance policy. Employees who fail to comply with the policy may be subject to the Councils’ Disciplinary Policy</p>	<p>It is critical that people facing discrimination feel able to report issues and receive the appropriate support from their managers and senior officers. Discussions on this issue will be included in training sessions, and any employee surveys that are undertaken. Work will take place in 2021 to better understand equality complaints and potential under reporting.</p>	<p>Following this review, feedback from staff and the staff survey results the council has developed and is trialling a harassment and discrimination reporting tool where staff are able report concerns about unacceptable behaviour discrimination and harassment.</p>

Our Services

Commitment	Action	Progress
<p>The Councils will ensure our services are of high quality and accessible where reasonable to all individuals and groups without discrimination.</p>	<p>Our Good Service standards make a commitment to delivering services which are accessible by all. We will in 2021 roll out service assessments to support implementation of the standard and to identify any priorities for improvements.</p> <p>Our new Customer Relationship Management system (CRM) is designed around our customer and service needs. It will from 2021 enable us to help all our customers more effectively, breaking down organisational silos. It will make accessing customer records and details easier and more consistent, and will enable us to manage specific customer needs more effectively.</p> <p>We will trial a new Equality Impact Assessment (EIA) approach in 2021 to support significant decisions and associated planned changes to services.</p> <p>When designing new services the SameRoom service design approach, our Effortless programme (including the Good Service standards) and the EIA process we will ensure the diverse needs of our customers are central. We will constantly review these processes to ensure they are adequately addressing equality and exclusion.</p>	<p>Our service improvement work continues and our service planning work for 2023 seeks to further support our EDI commitments.</p> <p>Work on the development of our CRM is ongoing and progress is being made. Further work is required to enable services to collect and interrogate EDI data.</p> <p>A new EIA approach has been developed, trialled and adopted. As described above, training has been provided to service managers and policy developers. The EIA process will be reviewed in 2024.</p>

<p>We will be responsive to the needs of local people and recognise the importance of removing barriers to communication. Individuals will be consulted about their communication needs and preferences.</p>	<p>Through our SameRoom service design approach and our Good Service standards we will always ensure user research is undertaken to understand the diverse needs of our customers, designing for all.</p>	<p>Through our participation Principle our work continues to improve community engagement and participation. In key services we have adopted a person centred and trauma informed approach, helping us to better understand communication preferences and provide better support.</p>
<p>We will ensure that our buildings are fully accessible and where this is not practical we will provide reasonable alternative methods of access so no one is discriminated against by physical barriers.</p>	<p>In 2021 we will seek to improve access through the commissioning of new access audits. As part of our workspace review process we will ensure accessibility for both our employees and our residents using services.</p> <p>We will, as necessary, review our community centres and public facilities in order to understand what investment is needed to make these spaces more inclusive.</p>	<p>This work has been prioritised through our Workspace programme and its rollout has helped ensure accessibility for both our employees and our residents using services. Work has successfully been completed at Worthing Town Hall and Portland House.</p>
<p>Adur homes will work with tenants to ensure homes meet equality standards, including accessibility and safety.</p>	<p>In consultation with West Sussex County Council (WSCC) Occupational Therapists or Medical Practitioners, Adur Homes Services undertakes adaptations to improve access and facilities in Council homes to meet specific needs of tenants with disabilities. Other aspects of access and equalities are also considered at the design stage for all other repair and improvement contracts</p> <p>Adur homes also work with tenants who have mental health or learning disabilities within their household to put in place adequate mitigating measures. If this is not possible we will, where possible, seek to provide a more</p>	<p>This work is ongoing and helps ensure disabled tenants, and tenants with specific needs, mental health or learning disabilities get the support and the accommodation needed.</p>

	suitable property.	
Adur homes will seek to meet the needs of the homeless and vulnerable with regard to equality standards, including accessibility and safety.	Adur homes will carry out suitability assessments, which take into account all disabilities, and use that information to identify emergency or temporary accommodation. To support this work we will maintain our level access units in our temporary accommodation stock.	This work is ongoing, though it is important to note the pressure on temporary accommodation at this time.
Complaints regarding equality and diversity from customers will be dealt with through the corporate complaints procedure.	We will improve our complaints process in 2021 and we will monitor complaints for issues around accessibility and inclusion to identify any remedial action necessary.	Our complaint process has been reviewed and improved and we are starting to collect equality data that should, in time, help us to better understand how we can improve our services.
We will seek to ensure that all contractors directly supplying goods and services or working on behalf of the Council comply with the relevant statutes and encourage good practice.	The new procurement strategy adopted in December 2020 will support the implementation of this commitment.	The procurement strategy is actively supporting the councils to ensure contractors directly supplying goods and services or working on behalf of the Councils comply with the relevant statutes and encourage good practice.

Community Consultation and Engagement.

Commitment	Action	
The Councils will continue to build closer links with those communities who may be subject to exclusion, discrimination and disadvantage.	As part of our Thrive Platform this work will be undertaken by our officers, through partnerships including the Local Strategic Partnership and through our commission with Community Works, a Third Sector	Our commission with Community Works continues and we will be reviewed in 2024. We have undertaken additional engagement with communities through Big Listen in Worthing and intensive community participation projects in Cissbury Fields, West

	<p>infrastructure organisation supporting community strength and voice.</p>	<p>Durrington, Adur River (Sussex bay) and Lancing.</p>
<p>The councils will use information, both qualitative and quantitative, to help build an understanding of the communities that make up Adur and Worthing, and the needs of those communities. In turn this will help to inform the development of policy and decision making.</p>	<p>To enable this work the councils will seek to develop a data and intelligence observatory, supported through the recruitment of a new data analyst in 2021.</p> <p>We will seek to undertake specific pieces of data modelling work to inform, shape and target interventions. In 2021 we will undertake place and community centred mapping using Local Insight.</p> <p>In 2021 a particular focus will be on supporting the Census and we will work to ensure marginalised and excluded communities are given additional support through our Local Authority Partnership Plan.</p>	<p>Our work on improving data collection has progressed and a data analyst was recruited in 2022. Further improvement work is planned for 2023/4. As part of this work we adopted an Equality Data Collection and Monitoring protocol to guide and shape this work.</p> <p>The Census process went well locally and through our Local Authority Partnership Plan we worked to ensure all our communities were able to participate. The results from the Census is now being used to inform service planning and strategy development. Local Insight has been adopted as a key tool to gather and share the findings of the Census with staff, members and the community.</p>
<p>The Councils are committed to learning from the Covid 19 pandemic, to improve public services, increase community resilience and assist communities in the recovery phase.</p>	<p>The Councils' response to the pandemic has been well regarded by local communities and we are keen to build on this.</p> <p>National data has shown us that the Covid 19 pandemic has affected communities differently, with young people, the BAME community, those with ongoing health conditions and those from disadvantaged communities hit hardest.</p> <p>Through the periods of lockdown and recovery the Councils have developed stronger and closer ties with many communities, including the BAME community and we will seek to develop these relationships and transform our</p>	<p>Specialist participation officers have been recruited and they have been undertaking wide ranging consultation and engagement projects across Adur & Worthing. One of these projects included commissioning of a third sector partner to engage with our BAME communities and better understand the impact of Covid 19, what the council could have done differently and how the council could better engage in the future.</p> <p>Our focus is now very much on the Cost of Living Emergency and two Road Maps, informed but EIAs, have been developed with</p>

	<p>services through our service design approaches described above. This work will be supported and developed through our commission with Community Works and the recruitment of a specialist participation officer in 2021.</p>	<p>community partners to support communities in Adur & Worthing through this difficult time.</p>
<p>The Councils will engage and consult with local communities regarding the implementation of this equality strategy.</p>	<p>Through the Equality Champions group, service reviews, customer feedback and ongoing community engagement, the Councils will seek to establish whether our services are accessible and meeting needs. The Councils will use a variety of means of engaging with the local community, recognising that some engagement tools will be more effective with different groups.</p> <p>A key consultation mechanism concerning disadvantage and inequality in 2021 will be the Climate Change Assembly report which will include a focus on disability and wider equality issues affecting residents in the borough and district.</p> <p>In 2021 the Councils will undertake work to ensure corporate communications support the objectives of the equality policy.</p>	<p>In addition to the above activities the council is more widely seeking to engage with residents to ensure our services are accessible and meet their needs. The Climate Assembly was very successful and included learning on equality and themes linked to a just transition.</p> <p>Both internal and external comms have been reviewed and a new communications plan has been developed. Through this refocus we are undertaking a change from broadcast to engagement, seeking to hear from and share information about our diverse communities.</p>