

2014

# **SELECTED EXAMPLES OF GOOD PRACTICE**

# STRATEGIC PLANNING AND EQUALITY BODIES

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*Strategic Planning and Equality Bodies: Selected examples of Good Practice* is published by Equinet, the European Network of Equality Bodies.

**Equinet** brings together 42 organisations from 32 European countries which are empowered to counteract discrimination as national equality bodies across the range of grounds including age, disability, gender, race or ethnic origin, religion or belief, and sexual orientation. Equinet works to enable national equality bodies to achieve and exercise their full potential by sustaining and developing a network and a platform at European level.

**Equinet members**: Commissioner for the Protection from Discrimination, **Albania** | Ombud for Equal Treatment, Austria | Interfederal Centre for Equal Opportunities, Belgium | Institute for Equality between Women and Men, Belgium | Commission for Protection against Discrimination, Bulgaria | Office of the Ombudsman, Croatia | Ombudsperson for Gender Equality, Croatia | Office of the Commissioner for Administration (Ombudsman), Cyprus | Public Defender of Rights - Ombudsman, Czech Republic | Board of Equal Treatment, Denmark | Danish Institute for Human Rights, Denmark | Gender Equality and Equal Treatment Commissioner, Estonia | Ombudsman for Equality, Finland | Non-Discrimination Ombudsman, Finland | Commission for Protection against Discrimination, Former Yugoslav Republic of Macedonia (FYROM) | Defender of Rights, France | Federal Anti-Discrimination Agency, Germany | Greek Ombudsman, Greece | Equal Treatment Authority, Hungary | Office of the Commissioner for Fundamental Rights, Hungary | Irish Human Rights and Equality Commission, Ireland | National Office Against Racial Discrimination, Italy | National Equality Councillor, Italy | Office of the Ombudsman, Latvia | Office of the Equal Opportunities Ombudsperson, Lithuania | Centre for Equal Treatment, Luxembourg | National Commission for the Promotion of Equality, Malta | National Commission for Persons with Disability, Malta | Netherlands Institute for Human Rights, Netherlands | Equality and Anti-Discrimination Ombud, Norway | Human Rights Defender, Poland | Commission for Citizenship and Gender Equality, Portugal | Commission for Equality in Labour and Employment, Portugal | High Commission for Migration, Portugal | National Council for Combating Discrimination, Romania | Commissioner for Protection of Equality, Serbia | National Centre for Human Rights, Slovakia | Advocate of the Principle of Equality, Slovenia | Council for the Elimination of Ethnic or Racial Discrimination, Spain | Equality Ombudsman, Sweden | Equality and Human Rights Commission, UK - Great Britain | Equality Commission for Northern Ireland, UK - Northern Ireland

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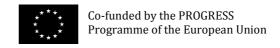
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# **Table of Contents**

Introduction	Page 3
Chapter 1: Benefits and potential challenges of strategic plans	Page 4
Chapter 2: Consultation as a step in the preparation of the strategic plan	Page 7
2.1 Why is consultation important?	Page 7
2.2 Choosing the stakeholders	Page 7
2.3 Consulting the general public	Page 8
2.4 Internal consultation / participation	Page 8
2.5 When does the consultation happen?	Page 9
2.6 How to consult?	Page 9
Chapter 3: Structuring and content of the strategic plan	Page 10
3.1 Organisational structure of strategies within a national equality	body Page 10
3.2 Content and structure of the strategy	Page 10
3.3 Annual work plans / activity plans	Page 11
Chapter 4: Selecting priorities for the strategic plan	Page 13
4.1 Previous plan	Page 13
4.2 Consultation	Page 13
4.3 Statutory Mandate	Page 14
4.4 External environment	Page 15
4.5 Other considerations	Page 15
4.6 Approvals	Page 16
Chapter 5: Monitoring the implementation and evaluating the impact of a s	
	Page 17
Annex 1 : Possible steps of strategic planning	Page 20
Annex 2: Survey on strategic planning for equality bodies	Page 21

# Introduction

Equality bodies work to combat discrimination and promote equality across the range of equality grounds covered by the European Union directives. Equality bodies exist in a variety of forms across Europe - indeed, there is a richness in the diversity of Equinet's membership including on such issues as their functions (from quasi-judicial to promotional); the grounds the bodies cover; their structures; their scale, in terms of staff, and other resources; and in respect of their history. The remit of many Equinet member bodies goes beyond the minimum requirements of the Equal Treatment Directives.

Many equality bodies have adopted a strategic plan to guide their work, and Equinet's Working Group on Strategy Development decided to focus on strategic planning during 2014 – partly to ascertain what is happening in relation to strategic planning and partly to ensure the sharing of good practice by equality bodies in this important area. Members were also conscious of the 2013 publication by Equinet of a paper on 'Processes and indicators for measuring the impact of equality bodies' and its finding that a strategic plan is a key enabler for evaluation.

The Working Group had two meetings in 2014 considering issues related to strategic planning and undertook a survey of Equinet members to collect information about practices relating to strategic planning.

The main questions of the survey have been used to structure this report, covering the areas of:

- benefits and potential challenges of strategic plans;
- consultation as a step in the preparation of strategic plans;
- structuring and content of strategic plans;
- selecting priorities for the strategic plans; and
- monitoring the implementation and evaluating the impact of the strategic plan.

This report presents some experiences and examples across these themes with a view to sharing generally with equality bodies in the aspiration that they will be useful and inspiring.

3

<sup>&</sup>lt;sup>1</sup> http://www.equineteurope.org/Measuring-the-impact-of-equality

# **Chapter 1: Benefits and potential challenges of strategic plans**

The experiences of Equinet members detailed in the responses to the survey clearly demonstrate that there are many advantages to having a strategic plan.

Some equality bodies have such a broad mandate, beyond ensuring compliance with antidiscrimination law, that having a strategic plan is the only way to give clear direction, formulate a theory of change and prioritise their work according to the key challenges identified for the country. Strategic plans also help the equality body to stay focused on its own agenda so that they do not have to attend to every equality issue in the news and can remain independent from potentially competing requests and calls for action by NGOs or Government. When strategic plans are legal requirements, which is the case for some equality bodies, they are also used to inform the competent authorities and state donors of the organisation's action plan within the resources provided.

More broadly, a strategic plan helps to define the purpose, principles and general objectives of the organisation. It provides a framework to enable a focus on areas where the organisation's interventions are most needed and/or where its contribution would have the biggest impact.

It helps to set priorities and so give clarity and guidance to employees' actions in the field of both promotion of equality and challenging discrimination, including in respect of complaints work. It is also a great benefit in terms of planning actions and should help the equality body to carry out its mandate in the most effective way, adding value and policy coherence. The strategic plan is a helpful tool to communicate the equality body's potential, goals and objectives to stakeholders and the general public, and to better situate the equality body in the overall institutional architecture on equality. It gives visibility and transparency to the equality body's activities and makes clear what can be expected from the institution and, indeed, what should not be expected.

Setting priorities will ultimately contribute to the effective use of financial, human and administrative resources. For the equality body's sponsors such as Parliament or Government, it will provide clarity and assurances as to how the equality body plans to use public funds to fulfil its statutory mandate (and in the context of the crisis and public budget cuts, this is seen as a highly relevant point). A clear and firm strategic plan can also prevent or limit political influence and demonstrate the equality body's independence. All in all, by putting a strategic plan in place, organizations can be expected to be more effective, organized and focused in their activities.

Strategic plans are also a valuable means to create a shared vision and consensus among employees about where their organisation is going, what the priorities are and how progress will be made. They reinforce collective work and collective intelligence provided that employees are fully involved with the process of drafting the future strategic plan and regularly consulted during its implementation.

The need for monitoring and evaluating the results and impact of the equality body is also very important. Strategic plans and the priorities they establish provide measures which can be used to identify the performance and the impact of equality bodies. Auditing the strategic plan is also fundamental to ensure that goals and objectives are still relevant and realistic, as well as providing learning to help shape subsequent strategic plans.

Some potential downsides and challenges of strategic plans were reported and deserve to be highlighted.

First of all, strategic plans tend to bind the organisation for a certain period and this can limit flexibility and responsiveness. That said, strategic plans should be capable of being responsive to any changing context, environment or resources and ensure that the equality body's ability to respond to emerging risks and opportunities is not limited. A robust horizon-scanning process during the planning phase should mitigate this risk, as should the use of clear principles and criteria to guide decision making within a strategic planning cycle. In order to ensure flexibility, strategic plans should not be too specific or detailed. This requirement has to be balanced with the risk of an overly general strategic plan becoming a "paper tiger" and not used in everyday work.

The consultation process with colleagues, partners and the wider public can also lead to unrealistic expectations from some stakeholders who might presume that, as they have commented on the plan about their priority issues, the equality body is bound to take them on board and will actively pursue those issues.

Focusing on some areas might also be interpreted as a loss for the other areas, especially from some stakeholders' point of view who are concerned with fields that are not priorities within the strategic plan.

Choices that have been made in the strategic plan may also have implications for the equality body's employees. If their competences do not match the needs of the strategic plan, it might be necessary to develop staff competences or in some cases hire new staff.

Drafting a strategic plan requires the allocation of staff time and resources to ensure effective consultation, follow-up, good drafting and continuing reviews of the plan. It also requires considerable commitment and time input from the equality body's leadership and management. However, this investment can be easily offset by the practical value and advantages of a good strategic plan.

Given the significant time needed to elaborate it, strategic plans should be multi-annual (most equality bodies reported a three year period) with some necessary adaptations to the changing environment. A comprehensive annual work programme, based on the strategic plan, can be drawn up to define the work for each sector for the upcoming year. As noted by several equality bodies that have a strategic plan in place, implementing some institutional activities will be constantly required (such as complaints handling, preparing opinions on laws), while others will be more time bound in nature. It remains

a challenge to continuously reconcile the long term plan and the day-to-day activities and to make sure that the latter contribute to the overall objectives.

Potential or identified downsides to strategic planning can be largely avoided if equality bodies are aware of and take measures to prevent them or limit their impact. They should continue to exercise vigilance throughout the duration of the process to ensure that disadvantages do not outweigh the benefits.

# Chapter 2: Consultation as a step in the preparation of the strategic plan

Building a good strategic plan requires the consultation of stakeholders - their support for the work of the equality body increases when they are consulted and involved in the preparation of the strategic plan. Furthermore, the consultation of stakeholders is also important in the evaluation phase which, in turn, is a basic step to preparing the next strategic plan.

# 2.1 Why is consultation important?

For an equality body, the daily work needs to be done in collaboration with the stakeholders. There are very few fields where an equality body can be seen as the only actor responsible for making progress towards an equal society. For equality bodies, it is essential to work with other actors (government, ministry, civil society, social partners, public bodies, international actors, etc.) to reach their goals.

This is even more crucial for the preparation of a strategic plan which will define the main directions for and objectives of the organisation for three, four or even five years. Consultation with stakeholders presents several advantages:

- Sharing the potential priorities with stakeholders demonstrates the importance that the equality body gives to them and enhances trust.
- It provides an opportunity to have different perspectives to help shape the strategic plan, which adds value to the process.
- The implementation of the strategic plan will be easier if stakeholders are involved in its development.
- For the evaluation phase, it shows that the equality body is not afraid of criticism and this can improve both its credibility and performance.

It is seen as good practice to give formal and personalised feedback to the stakeholders consulted. This contributes to increasing mutual trust and enables their support for and involvement in the implementation of the strategic plan. Feedback regarding the incorporation of the contributions of each stakeholder should be given, providing reasons whenever the contributions are not incorporated.

# 2.2 Choosing the stakeholders

Several criteria are used by equality bodies to choose the stakeholders to be consulted, such as:

- Regular partners;
- Actors which have a responsibility or a role to play in the implementation of an equality policy;
- Organisations and individuals not normally associated with the work of the equality body, in order to gain an overview of the wider picture;

• Organisations representing different levels: local, regional, national and international stakeholders.

Equality bodies report that there should be a fair balance between the number of the stakeholders – there must not be too many as after a certain level one more does not bring any significant added value - and their profiles. It is better to aim at the complementarity of stakeholders providing a good overview of the different forces in the society than to try to be exhaustive.

In the same spirit, depending on the stakeholder and its focus and expertise, it is sometimes useful to ask them to give their comments only on particularly relevant chapters or parts of the draft strategic plan.

# 2.3 Consulting the general public

The general public are also seen as important stakeholders to be consulted because they are the main target group of the equality body's activities and they are not necessarily represented in civil society organisations or other representative bodies. It is not easy to consult the whole population as it can be expensive and time consuming. However, it is possible as demonstrated by public consultation in Ireland.

In 2011, the **Equality Authority (Ireland)** held four public meetings, one in each of four different cities, as part of the consultation process in preparing its strategic plan for 2012–2014. The meetings were advertised locally, through civil society organisations, the Equality Authority's website, local and regional newspapers, and by invitation to individuals on the Equality Authority's website. Participants included individual members of the public, representatives of local and regional organisations, and local politicians.

At the meetings, a member of the board and a member of the senior management team of the Equality Authority outlined the functions and mandate of the Equality Authority and the process of preparing a strategic plan. Participants were divided into small workshops that were led by experienced facilitators. Participants were invited to outline their equality concerns and identify issues that were of concern to them that could be addressed by the Equality Authority in its next strategic plan. A member of the Equality Authority's staff took notes in each workshop. The meeting concluded with a plenary session which consisted of reports from each small group and a further opportunity to raise any issues or make suggestions. Participants were also invited to make written submissions if they wished to.

## 2.4 Internal consultation / participation

Traditionally external actors/partners are seen as stakeholders to be consulted. However, internal stakeholders are also important and consultation with and participation of internal actors is key to good strategic planning. Internal actors are familiar with the organisation, its statutory remit, its strengths, weaknesses and capabilities and they hold a vast experience and potential that can inform and benefit the strategic plan. Depending on the specificities of each equality body, internal consultation can involve advice committees, local or regional entities,

teams/departments and management board (especially if the board is made up of representatives from several external stakeholders - trade unions, NGOs, employers, etc.).

The Interfederal Centre for Equal Opportunities (Belgium) organised a two day meeting with all the staff members (between 50 and 70 people) to work on the strategic plan before drafting the first version. The idea is to have a brainstorming session on the main orientations for the three coming years. It's also an opportunity for every staff member to think outside their individual missions and expertise and to share their thoughts and vision with others. The Centre has organized such a meeting for the last three strategic plans.

# 2.5 When does the consultation happen?

Equality bodies consult at a number of stages of the strategic planning process and it is important to be clear with the stakeholders where they intervene in the process.

Consultation can take place at the very beginning of the process, without any draft, to have an informal and prospective vision of the main thinking on future direction without the limitations of a draft. Such discussions are most useful when held with people who are able to develop a long term, strategic and general perspective.

Consultation can be conducted in the middle of the process, perhaps with a first draft containing the main directions and priorities but not necessarily a structured text. It is at this stage that the influence of the stakeholder on the strategic plan can be particularly important, providing opportunity to shape the direction of strategic thinking regarding the plan's content.

Consultation can also be valuable at the end of the process, just before the adoption of the plan, when there is a structured, written text. This provides opportunity to comment on the detail rather than reverse the overall orientation of the plan. Consulting at this step is also a valuable means of informing stakeholders, before the general public, of the equality body's priorities and to prepare for their involvement in its implementation.

# 2.6 How to consult?

Consultation can take many forms and will depend on the type of the stakeholder and on the available budget. Some typical methods used by equality bodies are:

- Public meetings (see above, the example of Ireland)
- Face to face interviews
- Focus groups
- Electronic consultation with a form to fill out
- Written consultation (sending a draft and asking for answers)
- In-house process or subcontracting to an external company

# Chapter 3: Structuring and content of the strategic plan

This chapter describes how equality bodies report structuring their strategic plan. It looks at whether an equality body should have different sectoral or sub-strategies under the main strategy, as well as how the strategy is concretely built up, what parts it consists of and what each part could contain.

# 3.1 Organisational structuring of strategies within a national equality body

There are different possible ways of structuring the strategic plan, especially in cases where the equality body is part of an organisation with a wider or different mandate (e.g. a National Human Rights Institution or Ombud institution). The Equinet survey showed that in cases where the equality body has a wider or multiple mandates, some organisations put in place a specific strategy for the equality strand of their work (e.g. Croatia, Denmark), whereas others integrated equality issues in their overall strategic plan (e.g. Cyprus, Great Britain, Greece).

Some equality bodies also adopt strategies for the different types of work within the equality body with possible sub-/sectoral strategies such as:

- Communication strategy (adopted by the equality bodies in Romania, Slovenia, Croatia, Denmark, Cyprus, Sweden, Belgium, Norway)
- Litigation strategy (Great Britain, Croatia, Belgium)
- Treaty monitoring strategy (Great Britain, Denmark)
- Private sector strategy (Great Britain)
- International cooperation (Croatia, Denmark)
- Research and analysis strategy (Denmark)
- Educational strategy (Denmark)
- Internal organisational strategies on e.g. administrative development and competence development among staff (Denmark)

It is, however, important to ensure a good balance between having too many detailed strategies and having only one or a few strategies that focus only on the overall direction for the work of the equality body.

# 3.2 Content and structure of the strategy

There are many ways to formulate the content of a strategic plan. In the following, a non-exhaustive list of the most typical categories used by equality bodies is presented, while acknowledging that there are many categories that are interpreted differently, and many different words used that describe the same thing. The headings listed below are examples of what a strategy can contain, but each equality body will have to make their own choice on which parts will be needed and will fit in their strategy.

- **Introduction:** A short introduction to the work and plans of the equality body, describing also the mandate.
- **Context:** Describing the legal, societal, political environment of the equality body: this could contain an analysis of the external environment and an analysis of the strategic and political context of the equality body.
- **Mission/vision/values** of the equality body.
- Objectives/strategic priorities/strategic areas/focus areas/strategic direction: The main focus and part of the strategy listing a number of selected priorities/objectives/focus areas/strategic directions for the equality body (Chapter 4 gives examples on how to select these priorities). The number of listed main objectives in most strategic plans vary between three and seven. They describe what the equality body will focus on and each objective/priority should contain the following:
  - a) A description of why the objective is a priority in the strategy
  - b) **Target areas/initiatives/activities:** Under each objective a number of concrete initiatives or target areas which describe actions that will be taken in order to achieve the objective. These initiatives should take into account the available financial and human resources.
- Monitoring and evaluation/targets to measure success: This part of the strategic
  plan describes how the results relating to the strategic objectives will be measured
  and evaluated. In order to do this, it is useful to determine in advance the base line
  as well as key indicators and benchmarks so as to follow the developments of each
  strategic area.
- Long term goal per objective: Under this long term goal, it is useful to formulate 1-3 medium term goals which can give substance to the long term goal and guide the organisation in its daily work. This is also necessary for the process of "translating" the strategic plan into a more concrete work plan as described below. (Read more about monitoring and evaluation in Chapter 5)

There can be more or less detailed versions of a strategic plan; it also depends on the number of "sub-strategies" chosen by the equality body.

# 3.3 Annual work plans/activity plans

According to the Equinet survey, equality bodies most commonly tend to choose a timeframe of three years for the strategic plan, although this varies between one year and five years.

To make the strategy more concrete and action oriented, many equality bodies develop annual work plans that describe the concrete activities and projects under each of the objectives/focus areas of the strategy. At an even more detailed level below the work plan, most equality bodies also have detailed project descriptions of each of the initiatives/activities that all together make up the working foundation under the strategy or annual work plans for its individual departments/teams.

In Denmark the equality body is part of the **Danish Institute for Human Rights (DIHR)**. Therefore its strategy on Equal Treatment is a "sub-strategy" under the overall Strategy for the Danish Institute for Human Rights. Besides this strategy, the DIHR has other substrategies on communication, monitoring, research, international work and education.

The Equal Treatment Strategy of the Danish Institute for Human Rights consists of the following parts:

- Mission
- Vision
- Description of our mandate as an equality body
- Seven focus areas
- Under each focus area a number of activities are described that show how the DIHR will focus on achieving said objectives.

# The 7 focus areas are as follows:

- 1. Reform of equal treatment legislation in Denmark
- 2. Focus on involvement of and influence on Key actors (duty bearers)
- 3. Essential knowledge that can affect change
- 4. Knowledge at work (better use of national and international knowledge)
- 5. Overview using statistics and indicators
- 6. Platform for civil society
- 7. Mainstreaming gender equality into all the Institute's activities (internal objective)

# Chapter 4: Selecting priorities for the strategic plan

When selecting priorities for a strategic plan, it is clear that all equality bodies that have a strategic plan have a prioritisation process in place. The processes for prioritisation vary between equality bodies, as shown in the examples within this chapter. However there are a number of common themes used to select priorities such as - statutory mandate, a review of data concerning trends within member countries, and consultation. Many equality bodies also highlighted the fact that prioritisation of activities is obviously constrained by the availability of resources, both financial and staff numbers.

# 4.1 Previous plan

A number of equality bodies make reference to the first stage of any prioritisation being a review of the previous plan to highlight progress and address gaps. This review seeks to address whether inequalities that were planned to be tackled in the previous plan have been sufficiently addressed.

The **Equality Commission for Northern Ireland (ECNI)** commences the process of developing a new strategic plan in the third year of the existing plan. The work starts off with a review of the progress made in delivering on the objectives in the current plan. This review often utilizes research and data collection to inform the consideration of 'have the objectives been delivered?' and specifically 'have the activities been completed and is there evidence of the impact of the Commission's intervention on the identified inequalities?' (see Chapter 5).

## 4.2 Consultation

A consultation is seen as a key element of selecting strategic priorities. The stakeholders who are consulted vary and can include the governmental sponsor, NGOs within member states, internal staff, employers and the general public (see Chapter 2).

The **GB Equality and Human Rights Commission** develops its plan through wide ranging consultation with:

- Senior staff of the equality body;
- All the staff of the equality body;
- NGOs;
- Social partners;
- Government/ministry;
- Other public bodies;
- International Organisations, such as Equinet, the Fundamental Rights Agency, and other NHRIs and Equality Bodies.

The initial consideration of the progress to date and the content of the new plan for the **Equality Commission for Northern Ireland** is carried out by staff within teams who will review their own team's performance. Contributions from each team will then be considered collectively by the senior team and then with the Commission Board Members. These workshops will also generate the ideas for components of the next Corporate Plan including a continuation of some work streams, and new work streams to reflect any changes in the environment and any newly emerging inequalities such as an increase in racial attacks or increased expressions of homophobia.

Following these early discussions within the organization, a draft plan will be prepared for consultation with the ECNI's key stakeholders including representative organisations, trade unions, employer and business organizations and political representatives, etc. Following consultation, further revisions will be made to the draft and the budget for the plan will then be developed. The available resources will have been discussed in detail with the Commission's sponsoring Government Department.

At the **Danish Institute for Human Rights** the priority issues in the equality strategy was found through analysis and also involved a survey of stakeholder opinions on the work and how the impact could be strengthened. This was then discussed with all members of staff through a process led and finalised by management.

# 4.3 Statutory Mandate

Given that there are scarce resources, many equality bodies report that the primary way they select priorities for inclusion in the strategic plan is by reference to their statutory mandate and the legal framework in which they operate. Sometimes, as in the case of a review of legal cases, this is used to gather data which highlights trends to be addressed and sometimes it is a direct method of selecting priority areas that will be tackled through action plans.

The **Equality Commission for Northern Ireland** has a number of very specific duties in connection with employers' equality duties such as to annually receive a monitoring return from every employer with at least 11 employees identifying the number of Protestant, Roman Catholic and Other employees in their organizations. Every plan must include provisions to meet these duties.

The **Swedish Equality Ombudsman (DO)** defined the priorities of their strategic plan through an interpretation of their mandate. There were discussions about which forces outside the ombudsman's office could be identified as key factors in the work against discrimination and the interplay between those actors. The DO also tried to identify in what way their 'theory of change' (a theory of change is based on identifying the change an organisation is seeking and analysing how this change happens) can influence their strategic plan. Based on this interpretation, they discussed how the DO should use its

## 4.4 External environment

Linked in some cases to the legal cases received by equality bodies, this is sometimes broader and involves an interpretation of societal trends, issues affecting the wider population and newly emerging considerations through a broad horizon scan that identifies issues that are affecting a substantial number people or are having a significant impact on a particular group.

Even though the **Slovak National Centre for Human Rights** does not have a Strategic Plan, it has always carefully chosen its priority areas, especially during the creation of the Annual Plan of Activities. The priorities are indicated by the long-term observation of the situation in Slovakia, in consultation with the NGOs and other partners, adding the Slovak Government policy and observation of EU trends. The number of complainants in each area is also considered when drafting the Annual Plan.

The current **Norwegian Equality and Anti-discrimination Ombud** is in its second strategy period. In the first 2010-2013 period, a main concern was to create a common identity. For the 2014-16 period, the strategy itself gives principles for priorities: they have agreed on five strategic choices. The strategic choices give a sense of direction and help making priorities. For instance strategic choice #3 'We shall prioritize to help many', means that in choosing between, say, two courses of action, they will choose the one which is beneficial to the largest number of people, e.g. a case which could have consequences for more people than the one making a complaint. The five strategic choices are based on the presumption that they will be effective and efficient ways to bring about change and fulfil the mandate.

## 4.5 Other considerations

These are some of the common themes that have emerged from the examples given by equality bodies. However, there are other considerations and methods used for prioritisation which in some cases are linked to the particular demographic and societal issues of the country. The examples provided are listed here to show the wide range of issues used by equality bodies and in some cases where equality bodies use a combination of factors.

# The **GB Equality and Human Rights Commission** uses:

- An internal review of the evidence showing the greatest areas of need, primarily through the EHRC Measurement Framework
- Their statutory mandate (the Equality Act and the Human Rights Act)
- Horizon-scanning (cases, legislation, and broader trends)
- Stakeholder requirements from consultation phase (above)

• Review of impacts from previous plan

This process identified three main priority theme areas that incorporated equality and human rights issues and which explicitly and deliberately reflects the "FREDA" principles - "Fairness, Respect, Equality, Dignity and Autonomy":

- to promote fairness and equality of opportunity in Britain's future economy;
- to promote fair access to public services, and autonomy and dignity in service delivery;
   and
- to promote dignity and respect, and safeguard people's rights while in the custody of the state.

# The way in which the **Greek Ombudsman** sets priorities is:

- On the basis of the issues included in the cases/complaints the Authority receives
- On the basis of events that occur and require urgent resolution (e.g. order for demolition of Roma camps)
- On the availability of human and monetary resources

# 4.6 Approvals

While this may be seen to a certain extent to weaken the independence of equality bodies, a number of them reported the need to obtain approval for their strategic priorities and detailed action plans from their sponsoring departments. This approval might take place at earlier or at later stages, before or after the wider consultations with stakeholders.

The **GB Equality and Human Rights Commission** presented the initial priority themes and projects to

- Stakeholders and key partners working in the three priority areas mentioned above;
- Government officials;
- Parliamentary select committees and groups.

Once the outputs of these exercises had been reviewed and the plan amended and refined accordingly, the EHRC conducted an equality and human rights impact assessment to ensure they were fulfilling their duties as a public body across the individuals with protected characteristics under the Equality Act 2010, and that they were working consistently within the framework of international treaties, in particular reflecting on the timelines for treaty monitoring and reporting within the strategic plan cycle.

The **Equality Commission for Northern Ireland** forwards the plan to the sponsoring government department for approval. The Equality Commission is sponsored by the First Minister and Deputy First Minister in Northern Ireland.

# Chapter 5: Monitoring the implementation and evaluating the impact of a strategic plan

Monitoring the implementation of the strategic plan by equality bodies functions as an external reporting tool as well as an internal-focused mechanism guaranteeing that activities are indeed carried out. Monitoring also allows the equality body to react to a changing environment and to identify if some activities prove more difficult or less relevant than expected.

In the Equinet survey, equality bodies reported that they monitor implementation in a number of ways, for example:

- The **Portuguese Commission for Equality in Labour and Employment** translates strategic objectives into operational objectives and indicators and collects information on progress quarterly, as well as reporting to the responsible Ministry.
- The **GB Equality and Human Rights Commission** translates the 5 year Strategic Plan into Annual Plans and each year reports to Parliament on the delivery.
- The **Swedish Equality Ombudsman (DO)** has formulated an evaluation model with the assistance of external experts to better evaluate activities.
- The Slovak National Centre for Human Rights conducts an annual survey of several stakeholders to record if the Centre has progressed with the agenda and to note the improvement of the situation for victims of discrimination. The Centre also monitors relevant news items and conducts surveys on the most sensitive discrimination and human rights issues.
- The Danish Institute for Human Rights sets quantifiable goals to measure progress, for example, the equality body must contribute to 15 societal changes each year in the areas of disability, ethnicity and gender equality. In defining such change, the focus is on tracking change from the work of the equality body, for example the introduction of new legislation or a key duty bearer taking on more responsibility.

A key aspect of a strategic plan is that it has demonstrable impact. In other words, the plan must not just focus on activities and outputs such as staging a conference or publishing a report but should focus on the equality impacts the equality body wants to have. This might involve such impacts as increasing women's employment in senior positions in the public and private sectors, or improving disabled persons access to shops and restaurants for example. Evidence of such economic and societal impacts can also be found in improved policy development to tackle inequalities and in changing social attitudes to those experiencing the greatest inequalities such as Gypsy and Roma persons, as well as in demonstrable evidence of increased participation in society by members of equality groups. Of course it is not easy to gather evidence of such social

change nor is it a simple matter to attribute such change to the activity of an equality body.

Equinet published a paper in 2013 on 'Processes and Indicators for measuring the impact of equality bodies' to devise and recommend practical processes and indicators that equality bodies could use to measure the impact of their work at national level. The paper provides an overview of existing literature on evaluation of the work of national human rights institutions and equality bodies; the results of a survey on the experience of equality bodies in terms of evaluating their work; and actions that could be taken to measure the impact of equality bodies. The survey on the experience of equality bodies found that currently only a minority of equality bodies have a systematic approach to evaluating their work, although the number is growing.

The paper notes that, while evaluation offers real benefits, evaluation methodologies can exercise a pressure on what work the organisation prioritises and how it is pursued. The work of the body can be driven by what is measurable rather than by what is important. Other challenges identified are:

- The lack of a strategic plan and clear objectives for the equality body
- The complexity of evaluating the impact
- The lack of human and financial resources
- Finding the balance between quantitative and qualitative goals and indicators
- The difficulty of showing the causal link between the equality body's work and the impact measured
- The lack of data to measure direct impact (most evaluations use proxy indicators)
- Political challenges, including the unacceptability of critical evaluations

Both the Paper and the Equinet survey testify that Equality Bodies recognise more and more the importance of evaluating the impact of their work.

**Romania** reported that the impact of their strategy will be evaluated by independent experts of the Council of Europe.

In **Portugal** the evaluation of public services and their impact are required by law. In the first quarter of each year a self-assessment report for the previous year is produced and submitted to the responsible department and to the Minister to be evaluated and scored on a scale from Excellent to Unsatisfactory with a limit on the number of authorities that can score excellent.

In Great Britain, the legislation requires the Equality Body to consult on the effectiveness of their strategic plan towards the end of the three year cycle. The outcome of this consultation informs a decision as to whether the strategic plan should be retained for a

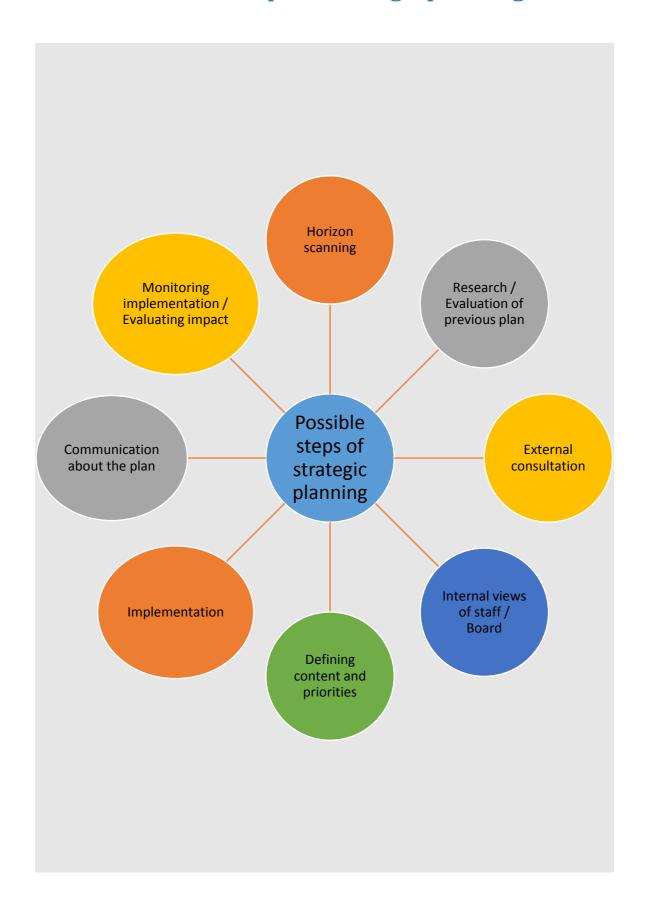
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<sup>&</sup>lt;sup>2</sup> http://equineteurope.org/Measuring-the-impact-of-equality

further period, or if a new one should be developed. The Equality and Human Rights Commission has developed a Measurement Framework and this Framework is used in deciding on the indicators in the Strategic Plan. The benchmarks and targets for success are drawn from the 'State of the Nation' reports that are periodically submitted to parliament and to international Treaty Monitoring bodies. The Commission recognizes that it is challenging to demonstrate whether, how and how much, interventions by the Equality Body have made a difference to the particular issue. To enable the Equality and Human Rights Commission to better understand the impact it has, evaluations of specific interventions are conducted over one, three and five year periods depending on the nature of the interventions and follow-up reports are produced. This type of evaluation is particularly valuable for those interventions which are very resource intensive such as dealing with public enquiries. Detailed analysis of the outcome of these evaluations form a crucial part of the planning process for the next strategic plan.

In **Northern Ireland** the equality body (ECNI) has an objective to 'Improve Equality Practices' and aims to do this by undertaking proactive work with targeted public authorities and other employers and service providers to drive improvements in their equality practices especially on a number of identified issues. A key measure is the extent to which contact with the Commission leads to changes in practices and procedures. A survey in 2012 reported that 33% of organizations had instituted a change to practice as a direct result of their contact with the Commission and for those who had three or more contacts with the Commission this figure rose to 61%; these figures were increased from those reported in the previous survey in 2007.

# **Annex 1: Possible steps of strategic planning**



# Annex 2: Survey on strategic planning by equality bodies

*Objective*: To collect information about practices of equality bodies related to strategic planning.

Information collected together with more detailed descriptions of WG members' experience will be used to provide basic guidelines / factors to consider and good practice examples on:

- What is the benefit of having a strategic plan?
- What are the pitfalls?
- The process used
- Consultation process in preparation of the strategic plan
- Defining the priorities of a strategic plan
- Monitoring and evaluation

# **Questions:**

3	<ol> <li>Are you as an equality body required by law or by Parliament/ Ministry to have a strategic plan? YES – NO (If yes, please specify)</li> <li>Do you have a strategic plan or are you currently preparing one? YES-NO</li> <li>What is the benefit / main objective of having a strategic plan (why is it helpful for the organisation)? TEXT BOX</li> <li>What are the possible down-sides of preparing a strategic plan?</li> </ol>
	TEXT BOX
answers 6	<ol> <li>Who was consulted or involved in preparing the strategic plan? (in boxes: senior staff of the NEB, all staff of the NEB, NGOs, social partners, government/ministry, other public bodies, other: specify)</li> <li>What was the process used to identify and select priority areas for action? TEXT BOX</li> <li>How have you organised your priority objectives? (in boxes: by the different functions of the body / by grounds of discrimination / by fields of discrimination / by broader equality and non-discrimination objectives that could encompass many grounds and many sectors, other: specify)</li> <li>Do you have in place sectoral strategies (in boxes: litigation strategy, communication strategy, other: specify)?</li> <li>If your body has a wider mandate (e.g. ombudsman, NHRI), how have you included your equality and non-discrimination objectives? (in boxes: by means of a specific strategy for equality and non-discrimination: describe, in an integrated manner covering all functions: describe)</li> <li>What does your strategic plan cover? (context / values / objectives / concrete actions / indicators, benchmarks and targets to measure success?)</li> <li>What are the priorities set in your strategic plan? TEXT BOX</li> </ol>

	<ul> <li>12. What is the period covered by the strategic plan (how many years)? NUMBER (provide choice of years 1-15)</li> <li>13. What is the process for monitoring the implementation of the strategic plan? TEXT BOX</li> <li>14. What is the process for evaluating the impact of the strategic plan? TEXT BOX</li> </ul>
To NO answers	<ul> <li>15. Have you had a strategic plan before? YES - NO</li> <li>16. Do you plan to have a strategic plan in the future? YES - NO</li> <li>17. What are the reasons for your body not having a strategic plan? In boxes: no added value / no legal obligation / bad experiences with it previously / political decision / other: specify</li> <li>18. Have you identified any issues or problems in the absence of a strategic plan? YES - NO (if yes, please specify)</li> </ul>



# **EQUINET MEMBER EQUALITY BODIES**

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LITHUANIA
Office of the Equal Opportunities Ombudsperson

(FYRO) MACEDONIA Commission for the Protection against Discrimination

MALTA National Commission for the Promotion of Equality

MALTA National Commission for Persons with Disability

NETHERLANDS Netherlands Institute for Human Rights

SLOVENIA Advocate of the Principle of Equality

SPAIN
Council for the Elimination of Ethnic or Racial

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