

Our equality scheme 2009–12

Evidence, Actions, Results



**Equality and
Human Rights**
Commission

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Foreword

Last year the Equality and Human Rights Commission (the Commission) published its first equality scheme. Our scheme was far-reaching and demonstrated our commitment to not only meeting but exceeding our legal duties to promote disability, gender and race equality and good relations in everything we do.

Looking back at what we set out to achieve it is clear that our plan was quite rightly ambitious and we have made some great progress. For example, we have conducted an equal pay audit, begun training staff on equality impact assessments and the general duties, ensured that our contractors adhere to our procurement criteria and monitored the effectiveness of our helpline.

In developing our three-year scheme we have built on the work of last year's one-year scheme and have been equally ambitious in what we are setting out to achieve. By working in close partnership with Commission colleagues and those that are affected by, or interested in, what we do we have ensured that we have a scheme which places equality right at the core of our organisation.

Our equality scheme focuses on the key areas of our employment practices, our service delivery and our working practices. Your ideas have been invaluable, often inspiring, and will have a real impact on how we do things.

I would personally like to thank you for helping us to shape our equality scheme and for your ongoing involvement and support.

Nicola Brewer, Chief Executive

Section 1

Introduction to our equality scheme

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Our equality scheme 2009–12

As a public authority, the Commission has legal requirements to promote equality in the areas of disability, gender, gender reassignment and race. Our first three-year equality scheme sets out how we will meet those legal requirements while also addressing the other areas of equality that we cover – age, religion or belief and sexual orientation, as well as human rights. We call this our single equality scheme as it reflects the Commission’s full remit.

The three-year equality scheme describes how the Commission will fulfil its moral, social and legal obligations to put equality at the heart of everything we do. Covering the period 1 April 2009 to 1 April 2012 the scheme is closely linked to our three-year strategic plan.

The Commission views equality, human rights and good relations between people as something that affects us all, regardless of background, and we are committed to working closely with all those who are affected by, or interested in, our work. We see this as an ongoing process enabling individuals and organisations to influence and shape the work we do.

In developing our three-year equality scheme we proactively engaged with stakeholders through extensive involvement and consultation.

Our approach to developing this scheme has been based on the work we do, rather than how we are structured as an organisation. We asked people to think about what they wanted us to achieve (‘outcomes’) and what they thought we needed to do to make them happen (‘actions’).

Section 1

Introduction to our equality scheme

Our equality priorities

Through working in partnership with stakeholders and reviewing a range of evidence sources we have identified the following key priorities for our three-year scheme.

We will use our action plan to focus on these priorities and provide clear accountability for their delivery.

Promoting equality in our service delivery

- We will develop a robust and accessible communications strategy.
- We will continue to improve the accessibility of our website.
- We will continue to prioritise legal cases in new areas of equality in order to build case law.
- We will address gaps in our knowledge base to ensure that we are prioritising key equality areas in our work.
- We will monitor the effectiveness of our helpline's provision of information, advice and guidance to ensure that they reach all groups.

Promoting equality in our working practices

- We will implement a robust involvement strategy to engage and respond to our stakeholders, with a stronger emphasis on working at a regional level.
- We will consult and involve representative networks covering all equality areas to help inform our future activities.
- We will strengthen our equality procurement framework so that suppliers can demonstrate their commitment to equality and explore training for suppliers as necessary.
- We will identify the equality profile of organisations who supply services for us and set targets to ensure they reflect the communities we serve.
- We will enhance our monitoring and analysis systems to expand on data collection, particularly around transgender issues.
- We will ensure that our grants process addresses all equality strands and targets previously underfunded areas.

Promoting equality in employment

- We will maintain the diversity of our staff to reflect the communities we serve across all the equality areas and will continue to monitor our workforce profile.
- We will reduce our gender pay gap from 5.5 per cent currently, to 5 per cent and extend our pay gap monitoring to include race, disability, sexual orientation, age, and religion or belief.
- We will develop a workplace environment where all our staff are treated with dignity and respect.
- We will continue to improve accessibility of our working practices and buildings.

We are also required to specify what our gender objectives are, they include:

- Reducing the gender pay gap within the Commission to less than 5 per cent.
- Developing, promoting and implementing a domestic violence policy.
- Investigating the high proportion of grievances raised by female staff.
- Developing a dignity at work/anti-harassment policy for our staff that specifically addresses issues for men and women, including transgender staff.
- Developing an involvement strategy that enables transgender people to get involved with our work.
- Ensuring that staff receive training on the positive equality duties including the Gender Equality Duty and its considerations in the impact assessment process.
- Including gender equality as part of our grant-making and procurement criteria.

Section 2

About the Commission

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Our equality scheme 2009–12

The Equality and Human Rights Commission is the independent advocate for equality, human rights and good relations in Britain. Challenging prejudice and disadvantage, and promoting the importance of human rights, our vision is a society built on fairness and respect with people confident in all aspects of their diversity.

Formed on 1 October 2007, the Commission is an independent statutory body established under the Equality Act 2006, which took over the responsibilities of the Commission for Racial Equality, the Disability Rights Commission and the Equal Opportunities Commission. Our sponsor department is the Government Equalities Office.

We enforce equality legislation on age, disability, gender, gender reassignment, race, religion or belief, and sexual orientation, and encourage compliance with the Human Rights Act. We are an intelligence-driven and evidence-based organisation and we continue to use our research and that commissioned by others to inform our thinking.

We use our influence and authority to ensure that equality and human rights remain at the top of the agenda for government and employers, media and society.

Acting directly and by building partnerships locally, regionally and nationally, we stimulate debate on equality, human rights and good relations. We provide advice and guidance to businesses, the voluntary and community sector, and individuals. By developing understanding of the causes and effects of inequality for people across Britain we are an authoritative voice for reform.

Section 2

About the Commission

Management team and Board of Commissioners

The Board of Commissioners, led by our Chair, Trevor Phillips, is responsible for setting the strategic direction of the Commission.

Chief Executive and Commissioner, Nicola Brewer, supported by the senior management team, is accountable to the Board of Commissioners for making sure that we achieve our business aims and for advising on emerging strategic priorities.

Board of Commissioners

Trevor Phillips OBE
Baroness Margaret Prosser OBE
Dr Nicola Brewer CMG
Morag Alexander OBE
Kay Allen
Baroness Jane Campbell DBE
Kay Carberry CBE
Jeannie Drake CBE
Rev Joel Edwards
Baroness Sally Greengross OBE
Professor Kay Hampton
Professor Francesca Klug OBE
Sir Bert Massie CBE
Professor Ziauddin Sardar
Maeve Sherlock OBE
Ben Summerskill OBE
Dr Neil Wooding

Our statutory duties

The Commission's statutory duties, set out in the Equality Act 2006, are to:

- Promote understanding of the importance of equality and diversity
- Encourage good practice in relation to equality and diversity
- Promote equality of opportunity
- Promote awareness and understanding of rights under the equality enactments
- Enforce the equality enactments
- Work towards the elimination of unlawful discrimination
- Work towards the elimination of unlawful harassment
- Encourage good practice in relation to human rights
- Promote awareness, understanding and protection of human rights
- Promote good relations among and between groups and others, where groups include a group or class of persons who share a common attribute in respect of any of the protected grounds
- Monitor the effectiveness of laws relating to equality and human rights and monitor and report progress towards identified desired outcomes
- Encourage public authorities to comply with section 6 of the Human Rights Act 1998 (compliance with Convention rights).

We also work closely with our colleagues in the Scottish Commission for Human Rights which has been established by the Scottish Parliament to work on human rights matters specific to Scotland.

Our statutory committees

The Commission has three statutory committees (Scotland, Wales and disability) which are responsible for ensuring that the overall work of the Commission reflects the needs and priorities of Scotland and Wales and the interests of disabled people, as well as developing their own specific work programmes and taking a lead role in working with our stakeholders.

Section 3

How we developed the scheme

Our approach to meeting the equality duties

As a public authority, the Commission has a legal requirement to promote equality in relation to disability, gender and race. The new Equality Bill was announced in the Queen's speech on 3 December 2008 and will strengthen protection, advance equality and simplify the law. It is likely that the new legislation will extend existing equality duties and, therefore, like other public bodies, the Commission has elected to produce a single scheme which will cover all the equality strands, extending to age, religion or belief and sexual orientation.

Our evidence base

In developing our three-year equality scheme we have gathered evidence from a number of sources to determine how we are delivering equality within our employment practices, our service delivery and our working practices.

Because of our role in conducting research and developing national policy, we have also drawn on the Commission's resources, reports and the internal expertise of our staff in developing this scheme.

We have also reflected on national data and specific research to inform our scheme and set benchmarks to develop appropriate targets for improvement.

Section 3

How we developed the scheme

Stakeholder involvement

We have built on the feedback we received on our first equality scheme and have ensured that we listened to many different individuals, organisations and members of our staff in developing our three-year scheme.

Between November 2008 and March 2009 we carried out an extensive programme of consultation and engagement seeking feedback to shape this scheme. This included involvement events for staff and stakeholders and a public online consultation.

Around 600 stakeholders and staff contributed to the consultation. A full list of the organisations who took part will be made available through our website at: www.equalityhumanrights.com/consultations. We have also actively engaged with our stakeholders to broaden our reach to include smaller, more grass-roots-based organisations and active local individuals who had not yet had the opportunity to engage with us.

We held a series of independent externally-facilitated 'New Voices' involvement events across England, Scotland and Wales. Through these events we have engaged with young people, transgender individuals, Gypsies and Travellers, faith groups and people with learning disabilities as well as representatives from more mainstream equality strands.

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Our equality scheme 2009–12

Running parallel to our New Voices involvement events we held seven strand-specific workshops for equality experts.

The Disability Equality Duty requires us to do more than simply consult stakeholders and staff. It gives us a duty to involve disabled people in an ongoing and meaningful way and we want to benefit fully from disabled people's views, experiences and ideas.

At each of our New Voices events, an involvement exercise was held for disabled participants who were asked to comment on the following questions:

- What actions should the Commission focus on in order to promote equal opportunities for disabled people?
- How can the Commission maintain contact with its disabled stakeholders and share information more effectively?

We also held an additional disability expert mandate group so that disabled stakeholders and those representing disability organisations could contribute more fully. Participants were asked for their active participation in proposing better contact and communication methods going forward.

Section 3

How we developed the scheme

Staff involvement

We held staff involvement events at each of the Commission's offices and asked staff to reflect on what they saw as the priorities for action for our three-year equality scheme.

We worked with our staff networks, mandate groups and our disabled staff group and took into consideration comments received from our union staff representatives.

How we have used feedback from our engagement with stakeholders and staff

We analysed all of the responses we received and used these to inform the equality scheme and its action plan.

The outputs from the New Voices events and all comments and submissions to the online consultation will be made available through our website: www.equalityhumanrights.com/consultations.

If you would like a copy in another language or format (such as braille, audio CD, data CD, Easy Read or large print) please visit our website or contact us using the details on the back cover.

The key messages from our stakeholders:

- You wanted us to develop a clear communications strategy reaching out to the most excluded groups within our society.
- You wanted to see much more regional activity and a closer working relationship with regional stakeholders.
- You wanted us to further enhance the accessibility of our website and helpline services.

- You wanted the Commission to ensure its work did not favour any particular strand or strands and to secure equal protection for all the equality strands through our work on the Equality Bill.
- You wanted to see the Commission use its powers more robustly to ensure public bodies gave due regard to their obligations. You also recognised, however, that promotion and prevention was a longer lasting solution to generating changes in behaviours and developing ‘fairer’ services and workplaces for all.
- You wanted the Commission to ensure that our suppliers were as diverse as the communities we serve. Just as important was the need to ensure that we only worked with those organisations who could demonstrate a strong equality commitment to their workforce and service users.

The key messages from our staff:

- The culture and attitude within the organisation was important to you and you wanted to see us address this within our dignity at work policy and through staff training including specific training for managers.
- You wanted us to review and promote our flexible working options ensuring all staff had equitable access.
- Improving the accessibility of our buildings was important and something you wanted a continued commitment to.
- You wanted us to strengthen our employment monitoring.
- You wanted us to extend our gender pay gap monitoring to cover all of the equality strands.
- You wanted us to strengthen our training for all staff on a range of equality issues.
- You wanted us to appoint an Access Officer who will be responsible for providing support to disabled staff and implementing an integrated system to managing reasonable adjustments.

Section 4

The scheme

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Our equality scheme 2009–12

Equality in our service delivery

The Commission has a key role in helping individuals to understand their rights and supporting them in accessing justice where appropriate.

We produce publications, marketing material and run accessible and challenging media campaigns and events that take particular issues and highlight them in imaginative ways.

Our campaigns and publications

Key observations

- Stakeholders were keen to see us use a range of approaches when we are launching our campaigns.
- Stakeholders wanted us to ensure our publications were accessible, use inclusive language and positively reflect all the equality strands within our remit.

Areas for improvement

- We will start to develop performance indicators at the start of each of our campaigns that clearly identify the audiences we are trying to reach, recognising that different communication approaches are required to reach different groups.
- We will sample a selection of our publications and quality assure them against our branding guidelines, which make specific reference to positive images.

Section 4

The scheme

Our helpline

We run national helplines in England, Scotland and Wales offering advice and information to anyone who wants to know more about their rights or responsibilities in relation to equality or human rights. Our helpline advisers are trained to deal with a variety of calls, from responding to requests for particular documents or information, to providing referrals to specialist legal advice.

Key observations

- The majority of calls received by our helpline are in relation to disability (60 per cent) followed by race (15 per cent) and gender (10 per cent).
- Current evidence tells us that:
 - 4 per cent of our calls are from 16–24-year-olds and only 2 per cent of our calls are received from the over 65 age group.
 - Females are more likely to call our helpline than males, 63 per cent and 37 per cent respectively.
 - 80 per cent of calls are received from the White ethnic group followed by Black/Black British callers (9 per cent) and Asian/Asian British (7 per cent), the Chinese ethnic group were the least likely to use our helpline services (1 per cent).

Areas for improvement

- The quality of monitoring data around the profile of callers to our helpline needs strengthening.
- We need to explore the contact routes available to individuals, widening our reach to groups not benefiting from the information advice and guidance that our helpline services provide.

4

Our equality scheme 2009–12

Our website

Our digital strategy, including our website, is one way in which the Commission provides information and guidance to individuals and organisations. We aim to ensure that our digital presence is accessible, cross-strand in nature and reflective of the communities we serve.

Key observations

- Stakeholders raised concerns regarding the ‘digital divide’ and how certain groups would be excluded from the benefits of our digital strategy and the use of our website.
- Stakeholders wanted us to address the accessibility of our website for all users ensuring equal access to information, advice and guidance.
- Stakeholders wanted to be able to find information, advice and guidance from our website easily, and for it to be reflective of all the equality strands within our remit.

Areas for improvement

- During 2009–10 we will focus on developing our website structure and tools for engaging with users to ensure that all communities benefit and that we reach new audiences including those who do not traditionally engage with us.
- We will develop a baseline picture of our users and the people we engage with so that we can assess the success of our digital strategy in reaching different groups, this will be used to inform future developments in our digital presence, including our website.

Section 4

The scheme

We carry out research

We commission, assess and publish research to help us become a respected source of evidence-based knowledge about equality and human rights.

Key observations

- We have carried out over 55 research projects covering all the equality strands in our remit. You can read more about our research projects in the 'research' section of our website: www.equalityhumanrights.com.
- Of the research work we undertook during 2008–09 only a small proportion related to our transgender strand work. We will be publishing a literature review on transgender and equalities early in the 2009–10 financial year.

Areas for improvement

- We need to continue to strengthen our evidence base across all the equality strands focusing in on the newer strands in our remit.

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Our equality scheme 2009–12

We investigate, mediate, enforce and provide legal assistance

Our legal strategy sets out the criteria we apply to determine whether, when and how we might use our legal powers and the priorities that we target for legal action. The basic criterion for the Commission's legal work is that the work will bring about positive change with maximum and lasting impact.

In relation to our proposed legal work, the Commission will consider the facts and relevant circumstances of a potential case or project, the statutory powers and the criteria for work by each of the Commission's three legal divisions (legal policy, enforcement, litigation and casework), and the Public Benefit Tool, in order to decide whether, how and by whom the Commission's desired outcome can be achieved most effectively.

You can find out more information about how we use our legal powers in the 'policy' section of our website: www.equalityhumanrights.com.

Section 4

The scheme

Key observations

- Our current strategic legal casework is not proportionately representative of all the equality areas:
 - 35 per cent are disability-related
 - 22 per cent are gender-related
 - 18 per cent are related to race, and
 - 7 per cent are related to religion or belief and sexual orientation and age.
- The equality profile of our litigation cases is more representative across the equality groups. However we still have a low representation of cases for transgender at 2 per cent, age at 9 per cent, religion or belief at 5 per cent and sexual orientation at 12 per cent.
- Stakeholders were concerned that the focus on strategic cases left other discrimination cases without the legal and advice support they needed.

Areas for improvement

- We need to strengthen our links with the advice sector including the Legal Services Commission and Citizens Advice Bureau, and other key partners, to build a network of advice, guidance and advocacy centres across all the equality areas within our remit and ensure that our signposting and referral mechanisms are improved.
- We need to start capturing the equality profiles of applicants requesting legal assistance, which would tell us whether our services are being accessed proportionately by different communities.

4

Our equality scheme 2009–12

Equality in our working practices

We involve and consult

This refers to how we involve people in our work. By involving we mean engaging with a wide variety of people and organisations in different ways and through different mechanisms. It is an ongoing process.

Key observations

- You wanted us to develop an involvement and engagement strategy that reached out to organisations so that we can ensure all equality strands are represented. You also wanted us to target groups that have traditionally not engaged with us.

Areas for improvement

- We need to further develop our involvement and engagement strategy to reflect our commitment to working in a transparent manner with all of our stakeholders.
- We need to ensure that the organisations we engage with fully represent all equality areas within our remit.
- We need to establish closer links with local and regional networks of equality campaigners.

Section 4

The scheme

We provide grant funding

We have the power to allocate funding to other organisations to help them in projects and other kinds of work that promote equality, human rights and good relations. Through our funding programme we invite applications from voluntary and other sector organisations and assess each application in order to provide support to innovative projects. We fund organisations working in any of the equality areas covered by our remit.

Key observations

- We funded over 289 organisations in our 2007–08 grants programme.
- Applications for grants received from organisations representing age, religion or belief, sexual orientation and transgender were low. There may be a number of reasons for low applications for grants from these equality areas, for example, a lack of capacity for applying due to infrastructure, a lack of awareness of the grants programme, or the availability of alternative funding sources.
- Organisations representing race and cross-mandate areas received 45 per cent of the funding available.

Areas for improvement

- We need to increase the ability of local and regional organisations across all the equality areas to bid successfully for grants, particularly organisations with less-established infrastructures and networks.
- We need to develop and invest in initiatives that develop regional networks for all mandate areas, including training and development opportunities for key individuals and capacity-building groups.

4

Our equality scheme 2009–12

We procure goods and services

By procurement we mean how we source goods, facilities and services from external suppliers. We believe that it is essential that people and organisations we sign contracts with to work on our behalf are accountable to us, and aspire to our vision and mission. We want them to abide by our equality and human rights obligations, including our duty to protect the human rights of those who use our services.

Key observations

The Commission spends around £35 million per annum in relation to its day-to-day operations as well as the delivery of the programme of works in relation to our key strategic priorities.

Areas for improvement

- We need to establish whether our equality procurement framework is being used robustly and that contractors are aware of their equality responsibilities.
- We need to ensure that all staff (not just those involved in our procurement function) fully understand the procurement process and its role within the equality agenda.
- We need to develop monitoring processes that allow us to capture the equality profile of organisations that supply goods, facilities and services to us.

Equality in employment

We have a duty to make sure that those policies and practices that affect our staff are fair and promote equality of outcome. Members of staff have rights in their capacity as employees. We want to enable all our staff to be fully involved in the Commission's work, to protect them from unfair treatment, to uphold our obligations to provide job descriptions, work plans, appraisals and related performance and monitoring systems, and to give them support, development opportunities and training.

To inform our priority areas for improvement we have gathered evidence from our equality monitoring data, equality impact assessments and consultation with staff, including our staff survey.

Workforce diversity

Key observations

- 66 per cent of the workforce are female – much higher than the proportion of women in the workforce population as a whole which is around 45 per cent.
- 21 per cent of our workforce describe themselves as having a disability, compared to 19 per cent of the population as a whole.
- 25 per cent of our workforce are from ethnic minorities compared to 8 per cent in the population as a whole.
- Just over half of staff are aged 20 to 39, with the remainder aged 40 or above. Four per cent are over 60.
- Two-fifths of staff state that they have no religious belief. Of the remainder, the largest group are of the Christian faith.
- 94 per cent of staff chose to disclose their sexual orientation.
- No staff identified themselves as being transgender.

Areas for improvement

- Currently we collate monitoring data on race, gender and disability across all our working practices. We have committed to extending our workforce monitoring to include all the equality areas in our remit.

4

Our equality scheme 2009–12

Our gender pay gap

Key observations

- The current national average UK gender pay gap according to the Office for National Statistics is 17.1 per cent.
- The Commission has a gender pay gap of 5.51 per cent. As a general guide, significant differences between the average basic pay of men and women would be classed as over 5 per cent.

These figures were arrived at by comparing average full-time equivalent earnings of men compared to women, in line with good practice.

We believe the following factors may be contributing to our gender pay gap:

- The trends of women taking time out of their careers for maternity and childcare, working part-time and choosing particular career fields.
- The limited number of women working in senior positions on a part-time basis.

Areas for improvement

- We need to develop a greater understanding of the gender split between different forms of work in the Commission (occupational segregation) and develop strategies to encourage women and men into areas where they are under-represented.
- We need to investigate the impact of maternity leave on career progression in the Commission, including the roles that women return to, information given when on leave, the impact on working patterns, management responsibilities and corporate culture.
- We need to actively promote job share and part-time working in our recruitment practices at more senior levels within the Commission, coupled with a mentoring scheme to encourage progression of women to higher grades (where they are under-represented).

Section 4

The scheme

Flexible working patterns

Current national trends in data tell us the demand for flexible working patterns by both workers and employers will rise, placing a need for innovative approaches to achieving flexibility in the workplace.

Key observations

- 83 per cent of our workforce is employed on a full-time basis compared to 17 per cent who are working part time.
- 23 per cent of females work on a part-time basis compared to 6.5 per cent of males.
- Staff are more likely to work part time if they work within the pay band level 1.
- 20 per cent of our disabled staff are working part time.

Areas for improvement

- We need to ensure that male staff are fully aware of the flexible working options including part-time opportunities and reduce the difference between male and female employees taking up part-time working.
- We need to increase the number of part-time female staff in band level 4 and above and monitor uptake of flexible working options by females in band level 4 and above.

4

Our equality scheme 2009–12

Supporting our staff with disabilities

The Commission is committed to creating a supportive and accessible working environment, based on mutual respect and trust, to enable all staff to carry out their roles.

We have consulted with staff through our involvement process to identify areas for improvement and to develop appropriate and relevant actions to support our disabled staff.

Key observations

- Disabled staff wanted us to provide an integrated approach to support them when implementing and managing reasonable adjustments.

Areas for improvement

- We need to recruit and develop the role of an Access Officer.
- We need to improve line managers' capabilities in supporting staff with disabilities.

Section 4

The scheme

Workforce training

The Commission is committed to offering learning and development opportunities to all staff, and will work in a targeted way to ensure all staff can access training and are able to use the skills required for their career progression. This will ensure opportunities exist to support the achievement of our pay gap target.

Key observations

- Our monitoring data tells us that take-up of training opportunities within the Commission across all equality groups are proportionate.

Areas for improvement

- We need to ensure that monitoring arrangements are in place to review access to and evaluation of training for each equality strand by September 2009 and identify whether there are any potential areas for action.

4

Our equality scheme 2009–12

Workforce disciplinary, grievance and promotion

The Commission is developing a new disciplinary and grievance process which is being introduced early in 2009–10 and as part of this we will be monitoring the impact of this on equality groups within the Commission. We currently have no disciplinary hearings that have progressed to formal action to report on.

Key observations

- The proportion of female, Black/Black British and disabled staff who have raised a grievance is disproportionate to the overall numbers within the Commission.
 - 78 per cent of grievances have been raised by female staff.
 - 29 per cent of grievances have been raised by disabled staff.
 - 17 per cent of grievances have been raised by Black/Black British staff.

Areas for improvement

- We need to work with our staff, staff networks and our colleague forum to investigate the reasons behind the over-representation of grievances raised by female, Black/Black British and disabled staff, set improvement targets and act on the findings.

Section 4

The scheme

Workplace culture

Key observations

- Our staff wanted to see us strengthen our commitment to treating all staff with dignity and respect in the workplace through greater understanding and awareness of the diversity amongst our staff and strengthening our dignity at work policy.

Areas for improvement

- We will strengthen and promote our dignity at work and harassment and bullying policies.
- We will train managers on 'How to Manage a Diverse Workforce'.
- We will promote the benefits of our Employee Assistance Programme.
- We will consult with staff on developing policies offering support on a range of issues that may affect staff including personal well-being, financial and mental health.
- We will develop, publish and publicise our policy on domestic violence.

4

Our equality scheme 2009–12

Equality impact assessments and monitoring

Evidence-based policy-making

As part of any effective policy development process, it is important to consider any potential risks to those who will be affected by the policy's aims or by its implementation and to consider only opportunities to actively promote equality that the policy presents.

The equality impact assessment (EIA) helps us to consider any potential risk on different groups but it also offers an opportunity to consider how the policy may help to further develop equality, thereby ensuring that we have the best possible policy in place.

Equality impact assessments are a major part of a wider approach to evidence-based policy-making, where the principles of monitoring, equality impact assessments and involvement lead to policies being developed that are user-focused and based on sound evidence.

Carrying out an EIA at the start of the policy development process allows the policy holders to identify, at every step, what the consequences may be to different groups, and whether a policy should adopt a certain direction/approach/criterion or eligibility requirement or whether there are any opportunities to promote equality.

This fosters ownership and a real understanding and commitment to 'get it right'. Most importantly it will lead to a focus on the user and, with the right involvement, it reduces the risk of creating policies that can lead to indirect and/or direct discrimination.

In this section, we use the term 'policy' as a shorthand term to cover policies, practices, functions, decisions and strategies.

Section 4

The scheme

What we will assess

The three existing public sector equality duties require public authorities to check how their policies affect people from different groups and communities in respect of disability, gender and race equality. This relates to both existing and proposed policies.

We have mapped our functions, policies and practices across the organisation and assessed them for their relevance to disability, gender and race equality and extended this assessment to include all the equality areas of our remit.

You can view more about how we carry out equality impact assessments on our website: www.equalityhumanrights.com/equalityscheme.

We will continue to review our functions, policies and practices and will update the list each year ensuring that we continue to assess each policy's relevance to the general equality duties and the other equality areas in our remit.

We have also taken steps to incorporate impact assessment into our programme and project management process.

Over the next three years we are committed to increasing our own evidence base, as well as continuing to draw on best practice from external organisations. We will identify gaps in our monitoring base and look to extend our data gathering to address those gaps.

4

Our equality scheme 2009–12

Training our staff

Through our internal training programme we provide mandatory equalities training for all staff to ensure they understand their role and objectives under the equality duties and wider equality legislation. In addition, we also provide specific training on equality impact assessments.

Staff are trained to understand:

- What is an equality impact assessment and why we do them.
- The benefits of equality impact assessments.
- The law on equality and human rights and how this relates to impact assessments.
- The process for carrying out equality impact assessments at the Commission.
- How to use our impact assessment tool.
- The roles and responsibilities of staff with respect to impact assessment.

We have developed an equality impact assessment tool and guidance to help staff to carry out impact assessments in a systematic way. To see our tool please visit the 'Our equality impact assessments' section of our website: www.equalityhumanrights.com/equalityscheme.

During our first year we trained key members of staff on equality impact assessments. We now want to extend this so that all current staff complete training on impact assessment by March 2010 and new staff receive training as part of the induction process. We will continue to review our training provision as well as our overall equality impact assessment process to ensure that it is fit for purpose and is updated to reflect feedback from staff and stakeholders.

Section 4

The scheme

Quality assuring our impact assessments

The Commission's senior management team have overall responsibility for the scrutiny of our impact assessments. Directors will be responsible for signing off equality impact assessments relevant to their function.

During 2009/10 we will set up a cross-directorate internal moderation group whose role will include quality assuring a sample of our equality impact assessments and monitoring and reviewing our overall process.

Monitoring

We are committed to gathering and monitoring data to assess the impact of our policies on staff and stakeholders and individuals who we represent.

To meet our duties on gathering information and monitoring, we have to have suitable systems in place to collect relevant data that allows us to assess existing policies to see how they affect different groups. We can then identify whether any of our policies are having an adverse impact on a particular group or are missing an opportunity to promote equality, and see how we can review or amend the policy to remedy the situation.

Why gather information on equality

In policy development equality monitoring can help us to understand:

- whether the policy is likely to have the intended effect
- how proposed policies might affect particular groups, and
- how we can amend policies to eliminate discrimination and promote equality.

4

Our equality scheme 2009–12

In service delivery, equality monitoring can help us to understand:

- the needs of service users
- which groups are using our services
- which groups are not using our services
- how to reach under-represented groups
- how satisfied different groups are with our services
- differences in service outcomes, and
- how to use our resources better.

In employment, equality monitoring can help us to:

- measure the make-up of our workforce and compare it to national data
- analyse personnel practices and procedures to see how they affect different groups of employees, and
- understand the causes of any pay gap by group.

We collect our employment data about recruitment, retention, promotion, development, impairment type, performance appraisal, grievances, disciplinary action, leavers, staff in post, training, part-time working and caring responsibilities.

We analyse this data by gender, gender reassignment, disability, racial group, religion or belief, sexual orientation and age.

Publication of our impact assessments results, consultations and monitoring

We are committed to publishing the results of our impact assessments, consultations and monitoring. Summary reports of our impact assessments will be published on our website. Full reports will also be available on request.

Section 4 The scheme

Responsibility and accountability

Our chief executive, Nicola Brewer, has overall responsibility for making sure that we carry out the actions in this scheme. Actions have been allocated to the relevant directors across the Commission and they are responsible for carrying these out and reporting on progress. We have identified responsible job holders for each point in the action plan. Our equality scheme team, which is part of the business planning unit, will monitor our progress.

Publication of our 2009–12 equality scheme and progress reports

The 2009–12 scheme is available on our website from 1 April 2009. The scheme will be reviewed annually. Progress reports will be published annually on our website shortly after the completion of each review process.

Our equality scheme and progress reports will be available in Welsh. If you would like a copy in another language or format (such as braille, audio CD, data CD, Easy Read or large print) please visit our website or contact us using the details on the back cover.

4

Our equality scheme 2009–12

How to give us feedback

We welcome feedback on our equality scheme.
You can do this by contacting us using the information below:

Equality Scheme Team
Equality and Human Rights Commission
Arndale House
The Arndale Centre
Manchester M4 3AQ

Telephone: 0161 829 8100
Textphone: 08456 046 620
Fax: 01925 884 275
Email: equalitiescheme@equalityhumanrights.com

Section 5

Our action plan

The actions set out in this plan relate to what we do as an organisation. We enforce equality legislation on age, disability, gender, gender reassignment, race, religion or belief and sexual orientation.

These are our main functions:

- We inform, educate and promote.
- We carry out research.
- We investigate, mediate, enforce and provide legal assistance.

To help us carry out our functions, we:

- employ people
- involve and consult people
- procure goods, facilities and services
- screen and impact-assess our work, and
- publish and review our equality scheme.

We have certain legal obligations under the three equality duties to promote equality in the areas of disability, gender reassignment and race. Each of the actions in our plan relates to one or more specific parts of an equality duty. To make this clear, we have numbered each part of each duty below. The table in this section includes a column showing which number or numbers relate to each action.

The Race Equality Duty gives us the following responsibilities:

1. Eliminate unlawful discrimination.
2. Promote equality of opportunity.
3. Promote good relations between people of different racial groups.

Section 5

Our action plan

The Disability Equality Duty gives us the following responsibilities:

4. Eliminate unlawful discrimination.
5. Eliminate harassment targeted at disabled people.
6. Promote equality of opportunity between disabled people and others.
7. Take steps to take account of disabled people's disabilities, even where that involves treating them more favourably than others.
8. Promote positive attitudes towards disabled people.
9. Encourage participation by disabled people in public life.

The Gender Equality Duty gives us the following responsibilities:

10. Eliminate unlawful sex discrimination.
11. Eliminate harassment.
12. Promote equality of opportunity between men and women.

The requirements to eliminate unlawful sex discrimination and harassment also include discrimination and harassment on the basis of gender reassignment.

In implementing this action plan we are aware that we may have to tailor our priorities and activities to suit the different social contexts in England, Scotland and Wales.

Outcome

Action

We inform, educate and promote

1. Our marketing campaigns reach the audiences that they are intended for.

1.1 Performance indicators established at the start of each campaign that clearly identify the audiences being targeted. We will use these to monitor our progress and adapt our choice of medium if required.

1.2 At the end of each marketing campaign we will produce a short report which will review our performance using these indicators and lessons learned.

2. Campaigns and associated publications reflect positive images of all the equality strands.

2.1 A 10 per cent sample of our publications will be selected and assessed against our branding guidelines, which cover all publications and make specific reference to positive images. Stakeholder feedback will be used to inform this process.

2.2 Recommendations will be used to inform staff training and refresh our branding guidelines.

3. Produce a regular e-bulletin reaching subscribers across all the equality strands in our remit.

3.1 Collate equality monitoring data on the profile of subscribers to our e-bulletin at point of subscription and use that information to target groups we are not reaching.

3.2 Continue to monitor the reach of our e-bulletin and address gaps in our audience.

4. Create publications that are accessible to all.

4.1 Within six weeks of the launch of major Commission campaigns we will gather and collate feedback on the accessibility of associated publications. We will do this on an ongoing basis.

Section 5
Our action plan

Timescale	General duty relevance	Responsibility
2009–10 and ongoing	2, 3, 6-9, 12	External Affairs Director
2009–10 and ongoing		
December 2009 and annually thereafter	2, 3, 6-9, 12	External Affairs Director; Communications Group Director
December 2009 and annually thereafter		
2009–10 and ongoing	2, 3, 6-9, 12	External Affairs Director
2010–11 and ongoing		
2009–10 and ongoing	2, 3, 6-9, 12	External Affairs Director

Outcome

Action

We inform, educate and promote**5. Engage and work with our stakeholders at a regional and national level.**

- 5.1** Programmes established to encourage greater influence and involvement of regional stakeholders. Particular attention will be given to third sector partners working in the following areas: religion or belief, gender reassignment, sexual orientation and age.
- 5.2** Monitor and consult stakeholders on the efficacy of Capacity Development programme. This will be used to identify areas for improvement.
- 5.3** Develop a regional engagement strategy detailing how regional colleagues will work with our stakeholders at grass-roots level.
- 5.4** Monitoring will be used to identify areas for improvement to the strategy.

6. Our website is accessible to all and provides information across all the equality strands in our remit.

- 6.1** Introduce user-centric testing of the Commission's website and wider digital presence to assess whether it meets the needs of different groups. Review findings and develop an action plan to address any differential impact.
- 6.2** Repeat user testing to continually improve the accessibility of our website.
- 6.3** Undertake a review of our existing information-gathering and monitoring arrangements in respect of our digital presence and develop an action plan to address any gaps as appropriate.
- 6.4** Introduce robust process and evaluation tools to assess technological developments to ensure they reflect the needs of the different groups we serve.

Section 5
Our action plan

Timescale	General duty relevance	Responsibility
October 2009	2, 3, 6-9, 12	National Director, Wales; National Director, Scotland; English Regions Director
2009–10 and ongoing		Stakeholders Director; External Affairs Director
October 2009		
September 2009 and ongoing		
June 2009 and ongoing	4, 6-9	External Affairs Director
September 2009		
2009–10 and ongoing		
October 2009 and ongoing		

Outcome

Action

We inform, educate and promote

7. Our helpline is accessible to all and provides quality advice and guidance.

7.1 Launch strategic campaign using current evidence of the spread of callers to promote the helpline service.

7.2 Produce quarterly monitoring reports to measure customer satisfaction, accessibility, spread of callers, profile of callers, complaints and identify ways to improve the quality and usage of the service where necessary. This may include ongoing training and development in evolving equality areas and issues.

7.3 Ongoing monitoring will be used to identify issues and areas for improvement.

7.4 Replace current 0845 number to a more affordable and accessible number and promote this change within our promotional campaign.

7.5 Implement the use of 'BSL Video Relay Service'.

We involve and consult people

8. Use networks and organisations that are representative of the equality areas we cover.

8.1 Complete a mapping exercise of equalities and human rights networks, contacts, key opinion leaders, private and public sector organisations and trade unions.

8.2 Findings used to develop a stakeholder database.

8.3 Review the stakeholder database quarterly, to ensure contacts are still up-to-date and new contacts are added to the database.

Section 5
Our action plan

Timescale	General duty relevance	Responsibility
June 2009	1, 2, 4, 6, 7, 10, 12	Stakeholder Relations Director
2009–10 and ongoing		
September 2009 and ongoing		
September 2009		
September 2009		
June 2009	2, 3, 6-9, 12	Stakeholder Relations Director; English Regions Director; National Directors
September 2009		
2009–10 and ongoing		

Outcome

Action

We involve and consult people

9. Use a wide range of methods to engage and respond to our stakeholders, whose views we use to inform our work (including policy work, legal work and setting our research priorities).

9.1 Hold a series of external consultation events to give stakeholders the opportunity to share their views on the involvement and engagement strategy.

9.2 Publish our involvement and engagement strategy.

9.3 Set benchmarks measures for attendance at our events to ensure we are reaching the audience intended.

9.4 Establish a working group that will meet bi-monthly to devise and implement an action plan to set up a ‘Consultation Finder’ facility on our website. This will allow stakeholders to search on our past, current and forthcoming events.

9.5 ‘Consultation Finder’ up and running and searchable by region and postcode.

Equality in employment

10. Maintain our current workforce diversity reflecting the communities we serve across all the equality areas.

10.1 Review workforce profile (including applications, shortlists, leavers, training and promotion) for each equality strand quarterly to identify any potential areas for action to improve representation. Report findings annually to senior management team by 31 March.

11. Flexible working patterns across the Commission are taken up by all staff regardless of equality profile, promoting innovative working practices.

11.1 Promote and develop flexible working options, reflecting our Working Better initiative.

11.2 Investigate and reduce the differences in uptake of flexible working patterns between:

- male and female employees
- female employees at bands 4 and above compared with those working at bands 1-3.

11.3 Monitor uptake of flexible working options by equality profile and measure progress annually.

Section 5
Our action plan

Timescale	General duty relevance	Responsibility
September 2009	2, 3, 6-9, 12	Stakeholder Relations Director; English Regions Director; National Directors
December 2009		
December 2009		
June 2009		
December 2009		
September 2009 and ongoing	1-12	People Director
December 2009	1-12	People Director
September 2009		
2009–10 and ongoing		

Outcome

Action

Equality in employment

12. Monitor and address any unjustified pay gaps across the Commission in relation to gender, disability and race.

12.1 Measure progress annually against gender pay gap target, establishing remedial solutions and present findings to senior management team.

12.2 Extend pay gap monitoring to cover race, disability, age, sexual orientation, religion or belief and gender reassignment.

13. Reduce the gender pay gap within the Commission to less than five per cent.

13.1 Investigate and consult with staff on reducing the causes of the gender pay gap, and take steps to address any issues including:

- The gender split between different forms of work in the Commission (occupational segregation) and develop strategies to encourage women and men into areas where they are under-represented.
- The impact of maternity leave on career progression in the Commission, including the roles that women return to, information given when on leave, impact on working pattern, management responsibilities and corporate culture.

13.2 Actively promote job share and part-time working in our recruitment practices.

13.3 Establish a mentoring scheme to encourage progression of women to higher grades (where they are under-represented).

13.4 Assess impact of all initiatives to determine what effect they have had on the reduction of the gender pay gap. Look at the initiatives and implications of these actions and assess suitability for roll out to other equality areas.

Section 5
Our action plan

Timescale

General duty relevance

Responsibility

**December 2009 and
annually thereafter**

10, 12

People Director

December 2009

September 2009

10, 12

People Director

2010–11 and ongoing

2010–11 and ongoing

2010–11 and ongoing

Outcome

Action

Equality in employment

14. Our staff understand their roles and objectives under the equality duties and wider equality legislation. They receive training and are confident in their knowledge of the work of the Commission.

- 14.1** Continue to implement a variety of learning opportunities for staff including, mandatory training workshops, e-based learning, secondment and mentoring opportunities. Set attendance measures.
- 14.2** Monitor evaluation and access to training by staff across all the equality groups. Set improvement measures if required.
- 14.3** Measure progress against attendance/evaluation/access measures on a quarterly basis and review and refresh training to ensure it reflects changes in the equality legislation.

15. Disabled staff are fully supported in all areas of their employment.

- 15.1** Review the effectiveness of the Access Officer creating a ‘single point of contact’ to support and manage the needs of disabled staff in an integrated way. Involve disabled staff in this process.
- 15.2** Publish guidance on implementing and managing reasonable adjustments and embed the role of the Access Officer.

16. Staff feedback confirms a culture in the Commission where everyone is treated with respect and dignity at work.

Continued on next page (page 60).

- 16.1** Revise our dignity at work and harassment and bullying policies and monitor their impact through our staff survey by equality profile and national data on bullying in the workplace for under-represented strands such as transgender staff.
- 16.2** Managers will receive training on ‘How to Manage a Diverse Workforce’ and set attendance benchmarks. Review and refresh training and measure progress against attendance benchmarks on a quarterly basis.
- 16.3** Develop and promote the benefits of the Employee Assistance Programme promoting mental health and emotional well-being and monitor usage and address differences in uptake of the service.

Section 5
Our action plan

Timescale

General duty relevance

Responsibility

Ongoing

1-12

People Director

**September 2009
and ongoing**

**September 2009
and ongoing**

**December 2009–10
and annually thereafter**

4-9

People Director

December 2009

**July 2009 and
annually thereafter**

1-12

People Director

**September 2009
and ongoing**

**September 2009
and ongoing**

Outcome

Action

Equality in employment

Continued from
previous page.

- 16.4 Review and develop our employment practices within our staff employee forum.
- 16.5 Investigate why a disproportionate amount of grievances in the Commission are from females, ethnic minority and disabled staff and present findings to the senior management team; develop and establish improvement targets and implement recommendations as appropriate.
- 16.6 Monitor impact of recommendations through grievance data and our staff survey by equality profile and address findings.
- 16.7 Consult with staff on developing policies offering support on a range of issues that may affect staff including personal, well-being, financial and mental health challenges.
- 16.8 Develop, publish and publicise our policy on domestic violence.
- 16.9 Review our employee assistance programme and its suitability to offer support to staff who may be experiencing domestic violence and implement recommendations.

17. Our ICT services are accessible, allowing disabled staff to work on par with their non-disabled colleagues.

- 17.1 Quarterly monitoring reports produced to measure customer satisfaction of our help desk services by equality profile and address issues identified.
- 17.2 Complete a review of our ICT services in partnership with the Access Officer and the Disabled Staff Group and implement action plans to address findings.
- 17.3 Identify appropriate professional body or independent accredited assessor and carry out an assessment exercise of our ICT services.

Section 5
Our action plan

Timescale

General duty relevance

Responsibility

**September 2009
and ongoing**

1-12

People Director

**September 2009
and ongoing**

**December 2009
and ongoing**

Ongoing

December 2009

December 2009

**2009–10 and
annually thereafter**

4-9

IT Director

October 2009

2010–11

Outcome

Action

Equality in employment

18. The working environment is accessible for all staff and visitors.

18.1 Establish a buildings working group including representatives from the People Team, the equality scheme team, the planning and environmental team and staff.

18.2 The group will review feedback from staff, staff groups, stakeholders and other evidence and develop draft plans to improve accessibility to our building, reflecting current public sector and professional benchmarks.

18.3 Consult with staff on proposed actions, and begin implementation of agreed plans.

We carry out research

19. We have a robust evidence base that covers all equality areas, fills gaps in existing evidence and is used to inform our ongoing work.

19.1 Identify the research gaps for new and existing work and consider how best to fill those gaps using either internally commissioned research or working within a research partnership.

19.2 Research outcomes are reviewed.

We procure goods, facilities and services

20. Through procurement, we achieve a diverse supply chain and our contracts are governed by a robust equality framework.

20.1 Monitoring arrangements in place to assess whether contractors are compliant with our pre-qualification questionnaire which makes clear to our current and future contractors our equality requirements.

20.2 Ensure all staff receive training on the procurement process and its role within the equality agenda. Set attendance measures and review and refresh training.

Continued on next page
(page 64).

Section 5
Our action plan

Timescale

General duty relevance

Responsibility

June 2009

4-9

Buildings Director

September 2009

October 2009

**September 2009 and
annually thereafter**

1-12 plus new areas

Research Director;
National Director;
English Regions
Director

**September 2009 and
annually thereafter**

September 2009

1-12

Finance Director

September 2009

Outcome

Action

We procure goods, facilities and services

Continued from
previous page.

20.3 Identify the equality profile of organisations represented in our supply chain and set targets to engage with organisations with under-represented equality profiles.

20.4 Consult with internal and external stakeholders to develop guidance that provides support and advice on our tendering and selection processes removing barriers to small- and medium-sized organisations and publish guidance.

We investigate, mediate, enforce and provide legal assistance

21. Our legal strategy supports cases relating to all the equality mandate areas we cover.

21.1 Develop robust monitoring of the cases being supported by the Commission by equality strand.

21.2 Remove disparities by working with funded groups such as Legal Aid, the Citizens Advice Bureau and other key partners to develop new approaches, and to identify and support strategic cases.

22. Individuals approaching the Commission for legal advice are representative of the communities we serve.

22.1 Monitor the equality profile of those individuals seeking legal assistance. If some groups are not approaching the Commission, we will address this through better targeting of our work.

23. Stakeholders have access to the legal advice and help they need as a result of effective referral and signposting.

23.1 Continual improvement of our case handling to ensure effective referrals, with quarterly reviews.

Continued on next page
(page 66).

Section 5
Our action plan

Timescale

General duty relevance

Responsibility

December 2009

1-12

Finance Director

December 2009

**October 2009
and ongoing**

1-12

Casework Director

**October 2009
and ongoing**

**October 2009
and ongoing**

1-12

Casework Director

**September 2009
and ongoing**

1-12

Enforcement
Director;
Policy Director;
Casework and
Litigation Director;
Stakeholder
Relations Director

Outcome

Action

We investigate, mediate, enforce and provide legal assistance

Continued from
previous page.

- 23.2** Continue to monitor client satisfaction with helpline advice on legal issues and develop strategies to address gaps as needed, with six-monthly reviews.
- 23.3** Work with funded groups and external partners and conduct an audit to ensure that our signposting and referral mechanisms are improved.

We screen and impact-assess our work

24. We have a robust and transparent equality impact assessment process.

- 24.1** Publish summary reports and results of assessments, consultations and monitoring on our website.
- 24.2** Establish an internal moderation group, meeting quarterly to assure the quality of our equality impact assessments.
- 24.3** Assess the quality of the review process and make changes if required.

25. Our employees are equipped with the skills they need to carry out equality impact assessments.

- 25.1** Provide tailored training for all staff and monitor attendance.
- 25.2** Review the suitability, accuracy and robustness of our training annually, through staff feedback and changes in legislation.
- 25.3** Monitor number of staff attending at follow-up training.

26. We have a clearly defined and up-to-date list of policies, functions and strategies.

- 26.1** Review and update list of policies, practices, functions and strategies as part of the Equality Scheme Annual Progress Report.

Section 5
Our action plan

Timescale	General duty relevance	Responsibility
October 2009 and ongoing	1-12	Enforcement Director; Policy Director; Casework and Litigation Director; Stakeholder Relations Director
2010–11		
2009–10 and ongoing	1-12	Business Planning Director
June 2009		
September 2009		
September 2009	1-12	People Director
2009–10 and annually thereafter		
Ongoing		
October 2009 and annually thereafter	1-12	Business Planning Director

5

Our equality scheme 2009–12

Outcome

Action

We publish and review our equality scheme

27. We implement our equality scheme. We will monitor it and publish our findings annually.

27.1 Review and report quarterly to the senior management team and produce an annual progress report.

Section 5
Our action plan

Timescale

General duty relevance

Responsibility

**2009–10 and
annually thereafter**

1-12

Business Planning
Director

Appendix A

Relevance assessments of our functions and policies

Appendix A

Relevance assessments of our functions and policies

Under the Race Equality Duty, we have a duty to assess our policies and functions to see how relevant they are to its three key components: (A) to eliminate unlawful racial discrimination (B) to promote equality of opportunity, and (C) to promote good relations between people from different racial groups.

In our 2009–12 scheme we have extended this process in order to check how relevant our policies and functions are to the gender and disability duties and also how relevant they are to our commitments in respect of age, religion or belief, sexual orientation and transgender.

The assessment for relevance has been carried out using the criteria set out in the Statutory Code of Practice on the Duty to Promote Racial Equality, with a number of additional criteria which reflect the Commission's specific responsibilities regarding our broad equality remit.

The basic principle of any assessment for relevance is that we should rank our policies and functions according to whether they have a low, medium or high relevance to (race) equality.

Each policy has been assessed using the following criteria:

Is the policy relevant to the general duty in respect of race, disability and gender?

In order to answer this we have used the following criteria:

In respect of Race

1. There is already evidence that the function or policy is affecting some groups differently.
2. There is existing public concern that the function or policy may be causing discrimination.
3. There are concerns that the policy or function may be damaging good race relations.

In respect of Disability

4. Eliminate unlawful discrimination.
5. Eliminate harassment of disabled people that is related to their disabilities.
6. Promote equality of opportunity between disabled people and others.
7. Take steps to take account of disabled people's disabilities, even where that involves treating them more favourably than others.
8. Promote positive attitudes towards disabled people.
9. Encourage participation by disabled people in public life.

In respect of Gender

10. Eliminate unlawful sex discrimination.
11. Eliminate harassment.
12. Promote equality of opportunity between men and women.

Appendix A

Relevance assessments of our functions and policies

Is it relevant to our commitments in respect of age, religion or belief, sexual orientation and sexual identity?

Does the policy have/or is it likely to have a positive or negative effect on communities and groups either by what it does, or by what it doesn't do?

If the policy has been identified as having an effect on any of the equality areas of our remit, how relevant (high, medium or low) is the policy to each equality area?

- There is already evidence that the function or policy is affecting some groups differently.
- There is existing public concern that the function or policy may be causing discrimination or harassment.
- There are concerns that the policy or function may be damaging good relations.

There is the potential for the policy or function to:

- affect staff and the public
- affect groups and communities differently
- lead to different experiences for different communities, and/or
- shape the achievement of equality, elimination of discrimination and/or the promotion of good race relations within British society.

Our equality scheme
2009–12

Function/Policy and practices	Status of policy, function or practice	Links to three strands of race duty	Race Relevance (High/Medium/Low)	Disability Relevance (High/Medium/Low)
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Equality in our service delivery

We inform, educate and promote

Publications function and policies	Current	A, B, C	High	High
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Digital Strategy (including re-launch of website, intranet and social networking sites)	Proposed	A, B, C	High	High
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Helpline function	Current	A, B, C	High	High
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Policy development	Current	A, B, C	High	High
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Major work programmes and projects	Current	A, B, C	High	High
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We investigate, mediate, enforce and provide legal assistance

The legal function including casework and litigation, enforcement and policy	New	A, B, C	High	High
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We carry out research

Research function	Proposed	A, B, C	High	High
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Appendix A

Relevance assessments of our functions and policies

Gender Relevance (High/ Medium/ Low)	Age Relevance (High/ Medium/ Low)	Sexual Orientation Relevance (High/ Medium/ Low)	Religion or Belief Relevance (High/ Medium/ Low)	Trans- gender Relevance (High/ Medium/ Low)	Schedule for EIA	Schedule for review
Low	Medium	Low	Low	Low	June 2009	2011/2012
Medium	High	High	High	High	Dec 2009	2011/2012
High	High	High	High	High	June 2009	2010/2011
High	High	High	High	High	Sept 2009	2011/2012
High	High	High	High	High	Ongoing	N/A
High	High	High	High	High	June 2009	2012
High	High	High	High	High	Sept 2009	2011/2012

Our equality scheme
2009–12

Function/Policy and practices	Status of policy or practice	Links to three strands of race duty	Race Relevance (High/Medium/Low)	Disability Relevance (High/Medium/Low)
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Equality in our working practices

We involve and consult

Stakeholder relations involvement and engagement strategy	Proposed	A, B, C	High	High
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We procure goods and services

Procurement policy and procedures	Current	A, B, C	High	High
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We provide funding (grants)

Application and assessment process for funding programme	Current	A, B, C	High	High
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Corporate Law and Governance

Freedom of information procedure	Current	A, B	Medium	High
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Complaints procedure	Current	A, B, C	High	High
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Appendix A

Relevance assessments of our functions and policies

Gender Relevance (High/ Medium/ Low)	Age Relevance (High/ Medium/ Low)	Sexual Orientation Relevance (High/ Medium/ Low)	Religion or Belief Relevance (High/ Medium/ Low)	Trans- gender Relevance (High/ Medium/ Low)	Schedule for EIA	Schedule for review
High	High	High	High	High	Dec 2009	2011/2012
High	High	High	High	High	Sept 2009	2011/2012
High	High	High	High	High	Dec 2009	2011/2012
Low	Low	Low	Low	High	Completed	2011/2012
High	High	High	High	High	Completed	2011/2012

Our equality scheme
2009–12

Policy and practices	Status of policy or practice	Internal or External policy recipients	Links to three strands of race duty	Race Relevance (High/Medium/Low)	Disability Relevance (High/Medium/Low)
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Equality in employment

Attendance management	Current	Internal	A, B, C	High	High
Disciplinary	Current	Internal and External	A, B, C	High	High
Learning and development	Current	Internal and External	A, B, C	High	High
Leave	Current	Internal	A, B, C	High	High
Retirement	Current	Internal and External	A, B	High	High
Fair treatment at work	Current	Internal	A, B, C	High	High
Capability procedure	Current	Internal	A, B, C	High	High
Dignity at work	Current	Internal	A, B, C	High	High
Induction	New	Internal	A, B, C	High	High
Probation	New	Internal	A, B, C	High	High
Redundancy	New	Internal	A, B, C	High	High
Equal pay	New	Internal	A, B, C	High	High
Maternity/Paternity/Adoption	New	Internal	A, B	Medium	High
Relocation	New	Internal	A, B	Medium	High
Stress management	New	Internal	A, B, C	High	High

Appendix A

Relevance assessments of our functions and policies

Gender Relevance (High/ Medium/ Low)	Age Relevance (High/ Medium/ Low)	Sexual Orientation Relevance (High/ Medium/ Low)	Religion or Belief Relevance (High/ Medium/ Low)	Trans-gender Relevance (High/ Medium/ Low)	Schedule for EIA	Schedule for review
High	High	High	High	High	June 2009	2010/2011
High	High	High	High	High	June 2009	2010/2011
High	High	High	High	High	June 2009	2010/2011
High	High	High	High	High	June 2009	2010/2011
High	High	High	High	High	Sept 2009	2010/2011
High	High	High	High	High	June 2009	2010/2011
High	High	High	High	High	June 2009	2010/2011
High	High	High	High	High	Sept 2009	2010/2011
High	High	High	High	High	Sept 2009	2010/2011
High	High	High	High	High	Sept 2009	2010/2011
High	High	High	High	High	Sept 2009	2010/2011
High	High	High	High	High	Sept 2009	2010/2011
High	Medium	High	Medium	Medium	Sept 2009	2010/2011
High	High	Medium	Medium	High	Sept 2009	2010/2011
High	High	High	High	High	Sept 2009	2010/2011

Our equality scheme
2009–12

Policy and practices	Status of policy or practice	Internal or External policy recipients	Links to three strands of race duty	Race Relevance (High/Medium/Low)	Disability Relevance (High/Medium/Low)
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Equality in employment

Recruitment and selection	New	Internal and External	A, B, C	High	High
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Guide to reasonable adjustments	New	Internal and External	A, B	Low	High
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Performance management	Proposed	Internal	A, B, C	High	High
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Organisational change	Current and Proposed	Internal	A, B, C	High	High
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Estates review	In Development	Internal and External	A, B	Low	High
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ICT function	Current	Internal	A, B	Low	High
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Information management services	Current	Internal and External	A, B, C	High	High
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Appendix A

Relevance assessments of our functions and policies

Gender Relevance (High/ Medium/ Low)	Age Relevance (High/ Medium/ Low)	Sexual Orientation Relevance (High/ Medium/ Low)	Religion or Belief Relevance (High/ Medium/ Low)	Trans- gender Relevance (High/ Medium/ Low)	Schedule for EIA	Schedule for review
High	High	High	High	High	Sept 2009	2010/2011
Low	Med	Low	Low	Low	Sept 2009	2010/2011
High	High	High	High	High	Sept 2009	2010/2011
High	High	High	High	High	June 2009	2010/2011
Medium	Low	Low	Low	Low	Dec 2009	2011/2012
Low	Medium	Low	Low	Low	Sept 2009	2011/2012
High	High	High	High	High	Sept 2009	2011/2012

Contact us

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