



**Snowdonia National Park Authority
Strategic Equality Plan**

Strategic Equality Plan Contents

	Page(s)
Introduction	3
The Equality Act 2010	4 – 6
How we developed our Objectives	6 – 7
Equality Objectives	7 - 18
Equality Impact Assessments	18
Monitoring the Plan and Publishing Information	19
Contact Details	19
Appendix 1: Equality Policy	20 – 26
Appendix 2: Equality Impact Assessment Template	27 – 32

Introduction

Snowdonia National Park

Snowdonia National Park was designated in 1951 under the National Park and Access to the Countryside Act 1949.

The National Park covers 213,200 hectares of varied countryside including mountain, moorland, woodland and coast. About 26,000 people live in the National Park which receives an estimated 10.5 million visitor nights each year.

Approximately 65% of the residents of the National Park are Welsh speaking.

Snowdonia National Park Authority

Snowdonia National Park Authority was established by the Environment Act 1995 as a single purpose local authority. It has the following purposes as defined by the Act:

- to conserve and enhance the natural beauty, wildlife and cultural heritage;
and
- to promote opportunities for the understanding and enjoyment of the special qualities of the (National) Park by the public.

The Authority has responsibilities for planning, conservation, land management, access and recreation but not for elderly care, schools, highways, emptying bins and other Local Authority duties.

The Act goes on to say that in pursuing National Park Purposes the National Park Authority shall seek to foster the economic and social well being of local communities within the National Park and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic and social development within the area of the National Park.

Additionally under the Environment Act 1995 the Authority is the local planning authority for the whole of the National Park. The Authority is therefore responsible for the production of the Park Management Plan, Local Development Plan and for the determination of planning applications.

The Equality Act 2010

The Equality Act 2010 is about ensuring a fair deal for everyone and focuses on ending discrimination, advancing equality of opportunity and outcome and fostering good relations between different individuals and communities.

It replaces the previous 116 different equality statutes in one all encompassing statute. It simplifies and clarifies the role of public Authorities as leaders in achieving equality improvements for their citizens and communities. Specific duties developed by the Welsh Government provide detailed and challenging requirements for Authorities but an overall emphasis on 'due regard' leaves authorities with greater freedom to produce distinctive local solutions and greater accountability to their communities.

Who is protected under the Act?

The Act sets out a new prescribed list of protected characteristics which replace what have traditionally been referred to as Equality Strands. These groups are protected through the general and specific duties of the Act.

The new general duty covers the following protected characteristics:

- **Age**
- **Gender reassignment**
- **Sex**
- **Race – including ethnic or national origin, colour or nationality**
- **Disability**
- **Pregnancy and maternity**
- **Sexual orientation**
- **Religion or belief**

It also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

The Welsh Language

Even though the Welsh language is not considered a protected characteristic under the legislation, the Authority believes that the people of Wales should not suffer any discrimination because of either their use of the Welsh language or their wish to communicate through the medium of Welsh. This is especially relevant within Snowdonia National Park boundary, where 63% of the population are Welsh speakers.

In line with the commitment outlined in the Authority's Welsh Language Scheme, the Welsh language will be included as part of the equality impact assessment toolkit. Appendix 4 includes a copy of the equality impact assessment template. Using this template will ensure

that future strategies, policies, plans and procedures produced by the Authority does not discriminate against people who speak Welsh, rather it will look at ways it can promote the use of the Welsh language.

For full details on how the Authority ensures that the Welsh and English languages are treated equally, please see the Authority's Welsh Language Scheme.

The General Duty

Public authorities are required to have due regard to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act.
2. Advance equality of opportunity between people who share a relevant protected characteristic and those who do not.
3. Foster good relations between people who share a protected characteristic and those who do not.

Having due regard for advancing these equality aims involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics;
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people;
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

Specific Duties

In addition to the general duty, the Welsh Assembly Government has introduced specific duties for public authorities in Wales. These specific duties are outlined in the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

The specific duties in Wales cover:

- Objectives
- Strategic Equality Plans
- Engagement
- Assessing impact
- Equality information
- Employment information
- Pay differences
- Staff training
- Procurement
- Annual reporting
- Publishing
- Welsh Minister's reporting

- Review
- Accessibility

How we developed our Objectives

Consultation and Engagement

Crucial to the development of this Strategic Equality Plan and in particular the Equality Objectives within it, was the extensive consultation and engagement that was undertaken with the local community and in particular a wide array of groups representing each of the protected characteristics.

Organising and co-ordinating such a large consultation is both time consuming and costly, and as a small public authority resources are very limited. To enable the Authority to achieve its goals, grouping together and working in partnership with other public authorities in North Wales was required.

The Authority joined forces with all 6 north Wales Local Authorities, the Betsi Cadwalader University Health Board, North Wales Police, North Wales Fire and Rescue Service and the Welsh Ambulance NHS Trust under the collective banner of North Wales Public Sector Equality Network (hereafter referred to as 'the Network').

The Network has enabled the Authority to collaborate with public authority partners to develop and facilitate an innovative joint consultation exercise across north Wales. Not only has this led to shared resources and reduced costs in this economically challenging time, but it has benefited all the consultees (many of whom work in a voluntary capacity) as they have been able to take part in one north Wales wide consultation rather than in several individual authority consultations.

The Regional Stakeholder Event took place on Tuesday, 20th of September 2011 at the Conwy Business Centre in Llandudno Junction. Over 40 groups, organisations and charities representing all the protected characteristics were in attendance (see appendix 1 for a list of groups who took part in the consultation).

On the 7th of November 2013, the Network held another North Wales Stakeholder Engagement Event at the Conwy Business Centre in Llandudno Junction. The aim of the event was twofold – to report on progress thus far with regard to achieving the objectives and to seek feedback on how we move forward. There were 18 organisations represented on the day, which consisted of community groups, voluntary organisations, charitable groups, educational establishments etc., that work with or consist of various groups of people with protected characteristics.

In addition to the collaborative north Wales wide consultation, the Authority has also consulted with its own staff, members, local groups and forums to enable it to develop specific actions and outcomes which will contribute to achieving the shared objectives as well as highlighting specific local actions.

Information from Local and National Research

National research was important in providing a starting point for identifying inequalities in north Wales. An extensive search of the available evidence around inequalities was undertaken by the Network in order to examine and explore the detailed data which needs to be taken into consideration in the development of the shared objectives. Additionally, each public authority looked at its own information to identify whether national trends were reflected in their own areas.

Analysis of the available information in combination with the consultation exercise led to development of 6 high level objectives, which will be the 6 adopted objectives for North Wales.

Each objective has an accompanying set of action areas. Action areas give definition to the 6 objectives and provide the basis from which each partner has planned their contribution to the achievement of those objectives.

The Network has agreed that each partner whilst having signed up to the 6 high level objectives, will have the flexibility to choose to contribute to only those action areas that each has decided is a priority for their area and based on the services they provide (for a comprehensive list of all objectives and action areas, including which partners are contributing, please see the separate document 'Shared Equality Objectives').

Equality Objectives

The 6 adopted North Wales Equality Objectives are:

1. Reduce **Health** inequalities
2. Reduce unequal outcomes in **Education** to maximise individual potential
3. Reduce inequalities in **Employment and Pay**
4. Reduce inequalities in personal **Safety**
5. Reduce inequalities in **Representation and Voice**
6. Reduce inequalities in **Access** to information, services, buildings and the environment.

Due to the specific role and duties of the National Park Authority, we have very little, if any influence on some of these objectives and action areas. However, positive contributions can be made through individual work areas, which will contribute to delivering results across north Wales.

Set below are the equality objectives and action areas which the Authority can contribute to through projects, initiatives and actions. In addition, through local consultation and data research, additional priority areas have been identified in which action is required.

Objective One: Reduce **Health** inequalities

Action Area: The number of people in under representative groups choosing healthy lifestyles increases

Project / Initiative / Action	Timetable	How will this contribute to the action area?	Protected Characteristics Affected	Lead Officer
Mosaic Project Officer appointment coming to an end in March 2015. Evaluate project outcomes and ensure continued contact with the Community Champions and ensure they are given adequate support to carry on in their role.	March 2016	By attracting more people from BEM groups into accessing and enjoying the countryside, this will lead to greater health benefits. Research indicates that people from ethnic minority groups were less likely to take the recommended amount of physical exercise.	Race	Community Officer
Improve access to the countryside by continuing with the monthly walks programme for visually impaired people. Encourage more volunteers of all age ranges to take part.	March 2016	Evidence suggests that the more integration occurs, more barriers are overcome and the greater the acceptance.	Disability All	Sustainability and Community Officer

Project / Initiative / Action	Timetable	How will this contribute to the action area?	Protected Characteristics Affected	Lead Officer
Improve access to the countryside by continuing to arrange monthly walks for Hafal attendees – a walk in centre that provides support regarding serious mental health problems.	March 2016	Evidence suggests that fresh air and exercise can have a positive effect on people with certain mental health problems.	Disability	Community Officer
Grade footpaths for accessibility – look at the good practice established by the NRW project and LDNPA Miles without Stiles scheme on this.	March 2013 – March 2016	This will make it easier for people with physical disabilities and parents with young children to make informed choices on suitability of various paths for them.	Age and Disability	Access Officer Interpretation Officer
Together with the other two Welsh National Parks – develop a Mission Statement together with Priority Actions on how National Parks can best be utilised to improve the community's Health and Wellbeing.	March 2016	By developing and enhancing the activities of the National Park Authority in a structured way to further support improvements in public health and social wellbeing through interaction with the National Park	All	Principal Policy Officer Sustainability and Community Officer

Project / Initiative / Action	Timetable	How will this contribute to the action area?	Protected Characteristics Affected	Lead Officer
<p>Together with the other two Welsh National Parks support the Campaign for National Parks' Lottery Bid for a Mosaic succession project.</p>	<p>July 2015 – July 2018</p>	<p>If successful the new project aims to build on the success of the present Mosaic project. Using the same model of using Community Champions it will not be exclusive to black and ethnic minority people. Working in Community 1st areas it will promote the National Parks as resources to improve people's health and wellbeing.</p>	<p>Race All</p>	<p>Community Officer</p>

Objective Two: Reduce unequal outcomes in **Education** to maximise individual potential

Action Area: The educational attainment gap between different groups reduces

Project / Initiative / Action	Timetable	How will this contribute to the action area?	Protected Characteristics Affected	Lead Officer
<p>Enabling all children regardless of disability / additional needs to be able to attend day and / or recreational courses at Plas Tan y Bwlch with their school groups.</p> <p>This is done through comprehensive risk assessments involving the school and parents and putting in place local assistance regarding health requirements when required e.g. local GPs, air ambulance etc.</p>	Ongoing	Removing the barriers that children and young people face in order that they can learn about, experience and enjoy all aspects of the national park.	Disability Age	Education Officers
<p>Arrange and facilitate a residential course for Ty Meirion pupils, enabling them to experience water sports etc.</p> <p>This is done through comprehensive risk assessments and subsidised visits arranged with partners.</p>	Annual	Removing the barriers that children and young people face in order that they can experience various outdoor activities.	Disability Age	Head of Business

Objective Three: Reduce inequalities in **Employment and Pay**

Action Area: Inequalities within recruitment, retention, training and promotion processes are identified and addressed

Action Area: Any pay gaps between different protected characteristics are identified and addressed

Project / Initiative / Action	Timetable	How will this contribute to the action area?	Protected Characteristics Affected	Lead Officer
Monitor rates of individuals from under-represented groups who apply for vacant posts.	Annually	The data collected will inform any future changes to the Recruitment Policy to enable members from under-represented groups to apply and get jobs with the Authority.	All	Head of Personnel
Assess and monitor gender pay gap data on an annual basis.	Annually	The data collected will inform any future changes to the Recruitment Policy.	Sex	Head of Personnel

Objective Four: Reduce inequalities in personal **Safety**

Action Area: The reporting of hate crime and harassment increases and steps are taken to reduce incidents of hate crime and harassment

Project / Initiative / Action	Timetable	How will this contribute to the action area?	Protected Characteristics Affected	Lead Officer
Work in collaboration with Network partners to raise awareness of hate crime and reporting mechanisms, using Hate Crime Awareness Week to focus the publicity. Work lead by NW Police and Police and Crime Commissioner's Office.	March 2016	Raise awareness of hate crime and how to recognise it, along with highlighting the importance of reporting incidents.	All	Head of Administration and Customer Care

Objective Five: Reduce inequalities in **Representation and Voice**

Action Area: Decision making bodies become more representative of the communities they serve

Action Area: Consultation and Engagement is improved through strengthening links between the Public Sector and local and national groups representing people from all protected groups

Project / Initiative / Action	Timetable	How will this contribute to the action area?	Protected Characteristics Affected	Lead Officer
Further develop the Authority's volunteer warden programme, allowing people from all backgrounds and from protected characteristic groups to be part of the Authority's work.	March 2016	Volunteer work is a good way for people from under representative groups to get actively involved, without fearing that lack of experience or qualifications is a barrier.	All	Head of Wardens and Access
Further develop volunteering opportunities within Yr Ysgwrn project, from Friends of the Ysgwrn, volunteer guides and development of a Youth Forum.	Second stage of project	Volunteer work is a good way for people from under representative groups to get actively involved, without fearing that lack of experience or qualifications is a barrier.	All	Yr Ysgwrn Project Manager Audience Development Officer
Continue to work closely with the Snowdonia Society and other partners to develop specific volunteer project days during the year.	March 2016	Volunteer work is a good way for people from under representative groups to get actively involved, without fearing that lack of experience or qualifications is a barrier.	All	Head of Wardens and Access Head of Agriculture, Forestry and Conservation Head of Business

The Eryri Equality Forum to have an active input into the review of the Park Management Plan	Review commencing Spring 2015	By mainstreaming equality and social inclusion into the Authority's work, this will have a positive long term impact on the Authority's strategies and policies.	All	Principal Policy Officer (Park Management Plan)
The Eryri Equality Forum to have an active input into the review of the Eryri Local Development Plan	Summer 2015	By mainstreaming equality and social inclusion into the Authority's work, this will have a positive long term impact on the Authority's strategies and policies.	All	Head of Strategic Policy and Plans

Objective Six: Reduce inequalities in **Access** to information, services, buildings and the environment

Action Area: Access to information and communications and the customer experience improve

Action Area: Physical access to services, transport, the built environment and open spaces improve

Project / Initiative / Action	Timetable	How will this contribute to the action area?	Protected Characteristics Affected	Lead Officer
Actions outlined in the Recreation Strategy for providing a diverse range of opportunities that are easily accessible will be completed.	During lifetime of strategy (5 years)	Access to open spaces and a diverse range of recreational facilities will be improved.	All	Head of Wardens and Access
Engage and consult with the North and South Access Forums and relevant access groups from the development stage of any accessible footpaths projects.	Ongoing	This will ensure that accessibility issues will be considered and incorporated at an early stage of the project.	Disability	Head of Wardens and Access Access Officer
Update Snowdonia For All website pages. Include information on legacy of Mosaic Project on the website together with contact details for relevant National Park staff.	March 2016	Valuable information for disabled people or young children in prams on accessible facilities, paths and recreational opportunities within Snowdonia. This will enable people to plan ahead for their visit and get the most out of the area. This will encourage people from black and ethnic minorities groups to visit Snowdonia	Disability Race All	Interpretation Officer Access Officer

<p>Promoting the historic environment of the Park to local community groups and the wider public through talks, guided walks and SNP Archaeology Day school</p>	<p>March 2016</p>	<p>By raising awareness of the historical and cultural environment of the National Park, people who do not want to undertake physical leisure activities will be encouraged to go out and about and explore the National Park, therefore encouraging other groups out into the countryside.</p>	<p>All</p>	<p>Archaeologist</p>
<p>Formal SLA with Conwy CB Council to continue with regards to management of Rights of Way. Continue to develop partnership approach with Gwynedd Council to manage Rights of Way within the Park.</p>	<p>Ongoing</p>	<p>Managing rights of way to ensure they remain open, safe and well maintained, will encourage more users of all abilities to enjoy the benefits of walking / cycling in open countryside.</p>	<p>All</p>	<p>Head of Wardens and Access</p>
<p>Ensure further development and implementation of Snowdonia Rights of Way Database, and promote its availability to the public.</p>	<p>March 2016</p>	<p>Effective use of the database will ensure resources are used efficiently and effectively in maintaining rights of way, and gives an opportunity for the public to quickly and easily report problems they encounter so that action can be swiftly taken to resolve issues.</p>	<p>All</p>	<p>Head of Wardens and Access GIS Co-ordinator</p>

Education Officers visit schools and give interactive presentations on all aspects of the national park which introduces them to the outdoor classroom.	Ongoing	Raising awareness and informing children, especially for schools in urban and economically deprived areas who cannot easily access the countryside.	Age	Education Officers
Update Communication Strategy Ensuring that the Eryri Equality Forum has an active input into the process.	March 2016	Access to information and communication improves.	All	Head of Education and Communication

Equality Impact Assessments

The Authority is required by the legislation to make arrangements in order to assess the likely impact of proposed policies and practices on our ability to comply with the general duty, as well as the impact of any policy or practice that we have decided to review or any proposed revision to a policy or practice.

For each new policy or practice (or revision of an existing policy or practice) the authority will assess the likely impact for its effect on people who share protected characteristics by undertaking an initial screening assessment.

If the policy or practice is likely to have an impact, a full equality impact assessment will be undertaken and an assessment report will be produced. Each assessment report will include the following information:

- the purpose of the policy or practice being assessed whether that is a new policy or an existing policy that is being reviewed or revised;
- a summary of the steps taken to assess the likely impact of the proposed or revised policy or practice;
- a summary of the evidence considered as part of the assessment process;
- the results of the assessment; and
- any decisions taken following the assessment.

A new equality impact assessment form has been produced and training has been given to relevant staff on conducting full equality impact assessments. This process is now fully operational, and we will be able to report annually on the outcome of the assessments undertaken.

Monitoring the Plan and Publishing Information

The actions outlined in this plan which contributes to the fulfilment of the equality objectives will be monitored regularly. The results will be reported to the Performance and Resources Committee annually in July.

Each full Equality Impact Assessment undertaken on any new or revised policy or practice will be published by the Authority on its website. Additionally, a summary of all the Equality Impact Assessments undertaken will be reported to the Performance and Resources Committee annually in July.

We are also required by the regulations to report annually and make progress statements on the following:

- the steps that the authority has taken to identify and collect relevant information;
- in respect of the information that it holds, how the authority has used the information for the purposes of complying with the general duty and the duties of the regulations;
- the reasons for not collecting the relevant information that it identifies but does not hold;
- progress made towards achieving the fulfilment of each equality objective;
- a statement about the effectiveness of the arrangements for identifying and collecting relevant information , and the steps taken towards achieving the fulfilment of each objectives; and
- the information the authority is required to publish in relation to employment information.

This Strategic Equality Plan will be in place for 4 years, but will be reviewed and amended as necessary on an annual basis.

Further information on the details set out in this Strategic Equality Plan by writing or e-mailing:

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Appendix 1: Equality Policy

This document sets out the Policy Statement of the Authority. It is part of a suite of documents in relation to the General Duty:

Local Authorities and other public bodies are required to have due regard to the need to:

1. eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
2. advance equality of opportunity between people who share a relevant protected characteristic and those who do not
3. foster good relations between people who share a protected characteristic and those who do not;

Having due regard for advancing these equality aims involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

And the specific duties outlined in the *Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011*. The Authority will be required to develop and publish Equality Objectives and a Strategic Equality Plan (including Equality Impact Assessments) by no later than 2 April 2012.

Snowdonia National Park Authority is committed to eliminating discrimination and encouraging diversity amongst its workforce. It aims to have a workforce that will be representative of all sections of society and where each employee feels respected and able to give of their best.

In pursuance of this, the purpose of this policy is to provide equality and fairness for all in the Authority's employment and not to discriminate because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex and sexual orientation. The Authority opposes all forms of unlawful and unfair discrimination.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Authority.

The Authority is committed to:

- Creating an environment in which individual differences and the contributions of all its staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated. The Authority has a separate Dignity and Respect Policy.
- Training, development and progression opportunities are available to all staff.
- Equality in the workplace is good management practice.
- The Authority will review its employment practices and procedures to ensure fairness.
- Breaches of the Authority's Equality Policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by the Authority, its managers and staff and has been developed with the recognised Trade Unions.
- The policy will be monitored and reviewed annually.

The Law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of "protected characteristics" which are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (which includes colour, nationality and ethnic or national origins)
- Religion or belief
- Sex or sexual orientation

Discrimination after employment may also be unlawful, for example, refusing to give a reference for a reason related to one of the protected characteristics.

The Authority and staff should not discriminate against or harass a member of the public in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

Types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Third party harassment occurs where an employee is harassed and the harassment is related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity), by third parties such as clients or customers. For an employer to be liable:

- The harassment must have occurred on at least two previous occasions (although not necessarily by the same harasser or suffering the same type of harassment);
- The employer must be aware that the previous harassment has taken place; and
- The employer must have failed to take reasonable steps to prevent harassment from happening again.

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so.

However, an employee is not protected from victimisation if he or she acted maliciously or made or supported an untrue complaint.

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Equal Opportunities in Employment

The Authority will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Job descriptions and person specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for the candidates with a disability. Disability and personal or home commitments will not form the basis of employment decision except where these are such that the candidate cannot comply with a genuine occupational requirement.

The Authority will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the time at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the Authority considers it has good reasons, unrelated to any protected characteristic, for doing so. The Authority will comply with its obligations in relation to statutory requests for contract variations. The Authority will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

The Authority will monitor the ethnic, gender and age composition of its existing workforce and of applicants for jobs, and the number of people with disabilities within these groups.

The Authority cannot lawfully discriminate in the selection of employees for recruitment or promotion, but it may use appropriate lawful methods, including lawful positive action, to address the under-representation of any groups that it identifies as being under-represented in particular types of job.

Dignity at work

The Authority has a separate dignity and respect at work policy concerning issues of bullying and harassment on any ground, and how complaints of this type will be dealt with.

Customers, suppliers and other people not employed by the Authority

The Authority will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Authority.

Employees / workers should report any bullying or harassment by customers, suppliers, visitors or others to their manager who will take appropriate action.

Training

The Authority will provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

General awareness information / training will also be available for all existing and new employees to help them understand their rights and responsibilities under the dignity at work policy and what they can do to help create a working environment free of bullying and harassment.

Employee Responsibilities

Every employee is required to assist the Authority to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, the Authority for any act of unlawful discrimination. Employees who commit acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the Authority's disciplinary procedure.

Grievances

If an employee considers that they may have been unlawfully discriminated against they should use the Authority's grievance procedure to make a complaint. If the complaint involves bullying or harassment, the grievance procedure is modified as set out in the dignity and respect at work policy.

The Authority will take any complaint seriously and will seek to resolve any grievance that it upholds. Employees will not be penalised for raising a grievance, even if the grievance is not upheld, unless the complaint is both untrue and made in bad faith.

Monitoring

The purpose of monitoring is to enable the Authority to examine how its policy and action plan are working.

Table from ACAS 'Delivering equality and diversity' booklet.

	Legal position	Good practice pointers
Race and ethnicity	Legal requirement for public bodies to monitor ethnicity. Use the ethnic groupings set out in the 2011 Census standards as a minimum.	<ul style="list-style-type: none"> • Do your employees know why you are asking them about ethnicity? • Have you explained what you mean by 'ethnicity'?
Gender	Legal requirement for public bodies to monitor gender – male and female.	<ul style="list-style-type: none"> • Are they more of one sex in certain jobs? • Flexible working can help to promote gender equality.
Gender Identity	Not a legal requirement to monitor. Recommendation is not to monitor. Disclosure of a person's gender reassignment can be a criminal offence.	<ul style="list-style-type: none"> • If monitoring is carried out, confidentiality should be guaranteed.
Disability	Legal requirement for public bodies to monitor disability. You are required to make reasonable adjustments to help a disabled person give their best.	<ul style="list-style-type: none"> • Don't make assumptions about a person's capabilities – talk to them. • Maintain confidentiality – many disabled people do not want to disclose their disability. • In some cases you can discriminate in favour of a disabled person when recruiting (see EHRC guidance).
Sexual orientation	Not a legal requirement to monitor. ACAS research shows discrimination on the grounds of sexual orientation is common – see our website.	<ul style="list-style-type: none"> • Are there any unvoiced barriers that prevent gay and lesbian colleagues giving their best or accessing opportunities? • Make sure you don't inadvertently identify gay or lesbian people. • Make sure your workplace environment is inclusive of gay/lesbian people.
Religion and belief	Not a legal requirement to monitor. ACAS research shows discrimination on religious grounds does occur (see our website).	<ul style="list-style-type: none"> • Consider some awareness training in faiths and beliefs. • Review your dress policy – some employees may wish to manifest their faith or beliefs in the way they appear.
Age	Not a legal requirement to monitor.	<ul style="list-style-type: none"> • Monitor agreed age bands and not individual ages. • Focus on training and development opportunities.

The Authority needs to monitor its employees at every stage of their employment life: from recruitment right through to retirement. This means asking people:

- Who apply to work for the Authority
- Who are interviewed and recruited
- Who are promoted
- Who are trained and in what work areas
- Who take out grievances at work
- Who are disciplined and what for
- Who are absent or sick and for what reasons
- Who are dismissed
- Who leave the Authority.

Job applicants will be asked to complete a monitoring data sheet that can be separated from the application form. The information on these sheets will not be used for short-listing.

An accurate picture of the workforce is also needed and existing members of staff will be monitored. This information will be gathered anonymously.

All information will be treated as strictly confidential.

Appendix 2:

IMPACT ASSESSMENT SCREENING: Key Questions

1. What is being assessed and what is its main purpose?
Please note the name of the strategy, policy, plan, procedure or practice to be assessed and a brief narrative of its main purpose or aim.

2. Who is affected by this strategy, policy, plan, procedure or practice? Who is it intended to benefit and how?

3. Have those people who will be affected by this strategy, policy, plan, procedure or practice been consulted and given an opportunity to respond? If not, has it been promoted and explained to those people who will be affected?

4. Are there opportunities within the strategy, policy, plan, procedure or practice to promote equality and is there an opportunity to promote positive attitudes towards people who share protected characteristics and promote good relations between different groups and communities?

5. Could this strategy, policy, plan, procedure or practice affect negatively and disproportionately any of the groups below?

Young People	<input type="checkbox"/>	Females	<input type="checkbox"/>
Older People	<input type="checkbox"/>	Males	<input type="checkbox"/>
Disabled People	<input type="checkbox"/>	Gay / Lesbian / Bisexual People	<input type="checkbox"/>
People of Ethnic Minority	<input type="checkbox"/>	Transgender People	<input type="checkbox"/>
Pregnant women	<input type="checkbox"/>	People of a particular religion or belief	<input type="checkbox"/>
People who are married or in a civil partnership	<input type="checkbox"/>	People who speak Welsh	<input type="checkbox"/>

6. What data, information, research or evidence have you used to answer question 3?

If you have decided that the proposed strategy, policy, plan, procedure or practice is not relevant to any particular group, this process is now complete. Please sign and date below and send a copy to the Head of Administration and Customer Care.

Name (print): _____

Signature: _____

Date: _____

If you have found from the above screening process that the proposed strategy, policy, plan, procedure or practice has a negative and disproportionate impact on one or more groups, please complete a full equality impact assessment

EQUALITY IMPACT ASSESSMENT

Following the initial screening process you have identified that proposed strategy, policy, plan, procedure or practice may have a negative and disproportionate impact on one or more groups. Complete the table below to assess the impact fully.

	Positive Impact	Negative Impact	No Impact	Reason and Evidence
Young People				
Older People				
Disabled People				
People of Ethnic Minority				
Pregnant Women				
People who are married or in a civil partnership				

	Positive Impact	Negative Impact	No Impact	Reason and Evidence
Females				
Males				
Gay / Lesbian / Bisexual People				
Transgender People				
People of a particular Religion or Belief				
People who speak Welsh				

1. Is the negative impact intended or legal?

2. Have individuals and groups with the protected characteristics been involved in the process and consulted with? If not, what steps will be taken to consult with them?

3. What does the consultation / research / data indicate about the negative impact?

4. Specify measures that can be taken to remove or minimise the disproportionate or adverse affect identified.

Having considered the above questions and acted on them where appropriate to do so; adjust the policy to mitigate against adverse impact, continue with the policy but set out clear justification for doing so or stop and withdraw the policy.

Please sign and date below and send a copy to Head of Administration and Customer Care.

Name (print): _____

Signature: _____

Date: _____