

Equality schemes framework

Disability Equality Scheme and Gender Equality Scheme

for the Health and Safety Commission and
the Health and Safety Executive

December 2006

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Introduction

The Health and Safety Commission (HSC) and the Health and Safety Executive (HSE) are committed to eliminating discrimination and promoting equality in our policies and how we deliver services. Our Disability and Gender Equality Schemes, along with our Race Equality Scheme launched in 2005, are central to our approach to ensuring that risks to people's health and safety are properly regulated.

We have set clear priorities for the first year of the Disability and Gender Equality Schemes. We will focus on achieving a number of high impact priorities to improve equality. They are challenging, but we are confident of making progress.

Our Schemes will evolve over time. We will monitor progress with our stakeholders and change the Schemes as we need to, to ensure ongoing success.

We have adopted an integrated approach to equality, which integrates our Disability and Gender Equality Schemes and will incorporate our Race Equality Scheme in 2007. We are committed to all aspects of equality and will make sure our agenda embraces diversity in full, including religion, sexual orientation and age.

This publication sets out how we will meet the general and specific duties to promote disability and gender equality as required by the Disability Discrimination Act 2005¹ and Code of Practice, and by the Equality Act 2006² and Code of Practice.

We outline:

- the mission and purpose of the Health and Safety Commission (HSC) and Health and Safety Executive (HSE), collectively referred to as HSC/E;
- our approach to diversity and how that has influenced the development of our Schemes;
- how we consulted and involved people; and
- our approach to impact assessment and monitoring progress.

We then set out in more detail our:

- Disability Equality Scheme and Action Plan; duties under the Discrimination Act 1995, as amended by the Disability Discrimination Act 2005;
- Gender Equality Scheme and Action Plan; duties under the Sex Discrimination Act 1975, as amended by the Equality Act 2006.

The role of the HSC/E

The HSC is responsible for health and safety regulation in Great Britain. The HSE and local authorities are the enforcing authorities who work in support of the Commission.

Our mission is to protect people's health and safety by ensuring risks in the changing workplace are properly controlled.

We look after health and safety in factories, farms, hospitals and schools, nuclear installations and mines, offshore gas and oil installations, the safety of the gas grid and the movement of dangerous goods and substances, and many other aspects of the protection both of workers and the public.

We are committed to delivering key targets to improve health and safety outcomes in Britain through progressive improvement in controlling workplace risk. There is now a much stronger **focus on health** programmes, as well as more traditional risks.

More details of HSC/E's current activities can be found on our website at www.hse.gov.uk.

Our diversity commitment

The vision for diversity

Our vision is 'to gain recognition of health and safety as a cornerstone of a civilised society'. That society is a diverse one. To achieve our vision, we must **protect everyone's health and safety** in the workplace, whatever their race, gender, disability, age, religion or sexual orientation - indeed whatever their background and outlook on life. Our ability to improve health and safety depends on this - it is a business imperative.

To be successful, HSE needs to understand the diverse society it operates in; be clear about the impact of our policies and operations on that diverse society; and conduct our business with sensitivity and respect for people's different needs, vulnerabilities and perspectives on life.

We will do this best if we ourselves reflect that diverse society. Encouraging and valuing diversity among our own staff is key to our success and effectiveness. We want to be a fair and inclusive organisation, respecting what each person brings to our business and recognising the value they add.

Where we are

In 2005 we reviewed how we operate in an increasingly diverse society, to see where we could improve.

As a result, the HSE Board agreed the following eight key priorities for making the vision a reality.

Making the vision a reality: Eight key priorities

- 1 **Raise awareness** among staff about diversity and the need for further progress.
- 2 **Build** - and make better use of - **evidence** into our policies and operations.
- 3 **Design interventions** to take account of different needs among particular groups of workers.
- 4 **Reach out** to people with particular understanding of diversity to help us to improve our policies and delivery.
- 5 Improve the **diversity of our workforce**.
- 6 Continue to take positive action to improve **career progression** for underrepresented groups.
- 7 Encourage and support disability, women and race **staff networks**.
- 8 Reward good **behaviour** and tackle unacceptable behaviour.

Work on the eight key priorities over the last twelve months has informed the development of our Equality Schemes. The main achievements include:

- working jointly with the Disability Rights Commission (DRC) to develop **principles and guidance on disability and risk management**;
- piloting, then completing, an **impact assessment tool** designed to help foresee the potential impact of policies on diverse groups of people;
- developing a new **communications toolkit and translation standard** as part of the findings of the Central Office of Information (COI) report on HSE's communications with diverse groups;
- **supporting our staff networks** for disability, gender and race;
- **improving support for disabled staff** via our occupational health provider.

Appendix 1 gives the full text of the priorities and further details of progress on all eight key priorities.

Where we want to be

In three years time we want to have:

- **improved our communications**, so that everyone has **equal access to information** about workplace health and safety risk and its control;
- enhanced our understanding of our **audience's needs to improve policy development and service** delivery;
- evolved into an organisation **free from barriers** to the recruitment, progression and success of a diverse workforce, playing to the different strengths of all **our staff** to ensure that we provide a service that **reflects our society**.

How we are going to get there

We have identified a number of **priorities for action** in relation to disability and gender. The key priorities are summarised below.

More detailed information, including timescales, can be found in the Disability Equality Action Plan and Gender Equality Action Plan.

Forward look: Key priorities

Disability priorities for action

For everyone:

- launch a **Diversity Communications Toolkit**;
- develop and publish **risk assessment guidance**;
- promote a more **disability-positive health and safety culture**;
- promote the use of HSE's stress management standards³ and managing sickness management guidance⁴ in the **prevention of work-related health ill health** and return to work of sufferers;
- develop stronger links with **disability groups**;
- improve the **diversity of our advisory bodies**.

For our staff:

- improve **career development opportunities** for disabled staff at all levels;
- improve **information and communications technologies support** for staff with particular needs.

Gender priorities for action

For everyone:

- encourage more **involvement of women in health and safety decision-making**;
- improve the **diversity of our advisory bodies**;
- review and consolidate the international **research on gender sensitivity** in workplace health and safety;
- include **pregnancy-related risk assessment** in a Fit3 campaign (Fit for work, fit for life, fit for tomorrow) in 2007/8;
- review and further develop our **website on gender factors**.

For our staff:

- improve **career development opportunities** for women, particularly to increase representation at higher job bands;
- steer through the programme of pay reform in the current (2005-2008) three-year deal period to help close equal pay gaps.

Assessment of functions and policies

We have assessed our functions and policies for their relevance to the duties on disability and gender and have prioritised them for future action. We assessed both our public duties and those relating to our staff. Policy-makers, operational staff, facility management managers, staff networks and trade union representatives were involved. The outcomes of the assessments are detailed in the sections on the Disability and Gender Equality Schemes.

Consultation and involvement

We have consulted and involved our diverse internal and external audiences to help develop our Disability and Gender Equality Schemes. We have worked with the Disability Rights Commission, and have contacted the Equal Opportunities Commission. We have also contacted a number of disability groups.

Engaging our external stakeholders

We have well-established links with a wide range of stakeholders in the field of health and safety, but recognise that we have more to do to link with a full range of people, championing gender or disability-sensitive occupational health and safety agendas. We are committed to **extending our networks and**

relationships with a broad base of interested stakeholders; this will ensure they are involved in monitoring and reviewing our priority actions.

Engaging our staff

Internally, we have involved our trade unions and staff networks in discussion about meeting our duties as an employer. During the summer we consulted staff through local office briefing sessions about diversity and asked for their views on priorities for action.

We considered the responses of external consultees and staff carefully, and their feedback has influenced the priorities for action developed for the duties on disability and gender.

Employment data

HSE's workforce data is analysed by gender, race and disability. Our database also provides information on age, location, length of service, time in current post, salary, hours of work, and employment status (temporary/permanent etc). We also collect statistics about promotion and performance appraisal and leavers.

We recognise that there is some reluctance amongst staff to declare that they have a disability; this is a monitoring difficulty for the Equality Scheme. This is similar to the issues faced in monitoring the Race Equality Scheme. We make enquiries at recruitment and on appointment, and then do periodic follow-up surveys, but we have limited success in getting further declarations.

A new self-service e-HR (electronic human resources) service is being introduced during 2006/07, which will ask staff to supply personal details on-line. Staff will be encouraged to declare whether they have a disability (and their ethnic group). This could lead to an improvement in the number of staff declaring, but we will need to reassure staff about confidentiality issues (ie only designated people in human resources (HR) will be able to access the information).

Complaints

We have well-established formal systems for handling complaints about HSC/E and its staff.

We provide our staff with clear guidance about how they should conduct themselves when dealing with the public, dutyholder or other groups. Any complaints against staff relating to any form of harassment would

be independently investigated and appropriate action taken if the complaint were upheld.

Grievances

Internally, our HR guidance identifies all forms of harassment and discrimination (whether related to disability, gender or sexual orientation) as serious or gross misconduct. The guidance advises staff how to raise grievances informally or formally, with line managers, HR Division or via trade union representatives. We have contracted an external agency to provide an employee assistance programme that staff can approach in confidence about any issues of harassment or unacceptable behaviour.

HR monitors all formal grievance and discipline cases and keeps detailed records. There are very few formal grievance or discipline cases from which to identify trends or patterns. However, all cases are monitored for equality and discrimination issues.

Monitoring progress and evaluation

In 2005 we set up a Diversity Steering Group, chaired at Board level, to steer and drive diversity in HSC/E. The steering group, which includes representatives of our staff networks and trades unions, will monitor progress against our schemes. They will also initiate action where required, to make sure the priority actions are delivered.

We will also involve external stakeholders in the review of our progress. We plan to do this by establishing relationships with key interested groups.

Progress against the Schemes will be reported to both the HSE Board and the HSC every year.

Impact assessment

We have developed and recently launched a **Diversity Impact Assessment Tool**. This robust tool is intended to help policy-makers and those designing and delivering services ensure the **consistent integration of equality considerations** into our day-to-day business.

Our impact assessment process is two-stage: an initial screening to assess whether the proposed policy, service, project or procedure has potential **equality implications for different groups**; then, a full assessment with detailed evidence analysis, stakeholder engagement and consideration of alternative approaches.

This two-stage approach will also be used to **assess human resources policies** to meet the employer duties under the Equality Schemes.

We will actively promote the tool and monitor its use.

Procurement standard

The terms and conditions of our contracts require contractors to adhere to statutory **equality and anti-discrimination requirements**.

We are an active member of the Department for Work and Pensions' Commercial Policy Best Practice Team, which provides an integrated and consistent cross-departmental direction.

Where we have specific diversity requirements, these are built into our contracts. For example, our protective clothing contract requires our contractor to meet the **personal requirements of both male and female staff**.

We have improved our event management guidance to include terms about **ensuring access to buildings and providing suitable catering for diverse audiences**, whenever we are the hosts or co-hosts.

Annual report

Annual progress reports on Equality Schemes will be published on our website and summarised in HSC/E's annual reports.

Equality Schemes review

We will review progress on our Equality Schemes every twelve months. We will carry out a full evaluation of each Scheme in three years' time to help set a new agenda for action. As part of this process we will make sure that we involve stakeholders, our staff and trade unions.

Disability Equality Scheme

Definition of disability

We follow the Disability Rights Commission (DRC)* guidance on the definition of disability, which is drawn from the Disability Discrimination Act 1995 as amended by the Disability Discrimination Act 2005.

The Disability Discrimination Act says that a disability is a physical or mental impairment which has substantial and long-term adverse effect on your ability to carry out normal day-to-day activities.

Further details and information can be found at www.drc.gov.uk/your_rights/are_you_being_discriminated_ag/definition_of_disability.aspx; and

www.drc.org.uk/usingyourrights/disabilitydiscrimination/person.asp.

Forward look: Priorities for action

Following consultation and the review of policies and functions, the following priorities have been agreed:

For everyone:

- **launch the Diversity Communications Toolkit** which offers practical advice on how best to communicate with our diverse audience;
- **develop and publish risk assessment guidance** in partnership with the Disability Rights Commission;
- **issue revised information and guidance** to HSE field staff on providing health and safety advice to employers regarding the retention of disabled workers;
- **promote** the use of HSE's Management Standards for work-related stress;
- **develop and issue** advice for managers on how to help people at work suffering from mental health issues connected with work-related stress; and how to help those absent from work with such conditions;
- promote a more **disability-positive health and safety culture** by promoting the 'reasonable adjustment' principles contained in the guidance to the **Display Screen Equipment Regulations**,⁵
- **develop** networks with disability groups to secure involvement of disabled stakeholders in policy development and monitoring;
- work towards improving the diversity of our **advisory bodies**.

* The DRC is an independent body established in April 2000 by Act of Parliament to stop discrimination and promote equality of opportunity for disabled people.

For our staff:

- improve performance management to **support and promote the career development opportunities** of disabled staff at all levels;
- **review the vacancy-filling arrangements** to ensure that disabled staff are not disadvantaged;
- **consolidate improvements made in managing the performance appraisal system** to make sure disabled staff have equal opportunity to high performance awards;
- review and revise, where necessary, provision of and support for information and communications technologies for staff with particular needs.

Details of the part of HSC/E with responsibility for taking forward the priorities and timescales for action are given in the **Disability equality action plan**.

Involvement

An internal working group was set up to oversee and advise on the development of the Disability and Gender Equality Schemes. Members included our Board Champions for disability, women and race.

Representatives from Equal, our staff disability network, were part of the Equality Schemes Working Group and advised on the development of the Disability Equality Scheme. They took part in the assessment of internal functions, policies and services and were provided with statistical information. They were involved in the discussions about priorities.

Employment data

The key baseline data is:

- at April 2006, 167 (3.8%) of staff had declared they had a disability. This low percentage reduces the value of statistical analysis about internal HR issues (but we seek to collect information via other routes - such as our annual staff attitude survey);
- disabled staff tend to stay longer in the same job band compared with other staff (particularly at job band 4), which indicates slower career progression compared with other staff;
- disabled staff tend to be concentrated in three main disciplines: administration, general inspector and scientific. They are under-represented in more specialist disciplines, which attract higher rates of pay;
- however, the percentage of disabled staff gaining promotion to more senior job bands (1-3) is higher than for other staff; but is significantly lower for promotions to junior bands (4 and 5).

Internally, the key issue for HSE remains representation at all levels of the organisation.

Table 1 shows the representation of disabled staff at 1 April 2006 (the figures for disabled staff at Senior Civil Service (SCS) and the senior job band 1 are combined because of the low numbers).

Job band	Disabled		Total staff
	No	% of staff in band	
SCS	4	1.7	51
1			127
2	26	4.3	609
3	36	2.8	1298
4	17	3.1	548
5	19	3.3	579
6	55	6.4	856
Total	157	3.9	4068

Table 1: Disabled staff by job band (at 1 April 2006)

The disabled figures are based on self-declarations. We believe there is a significant level of under-declaration, which we will take further action on. The figures show that overall representation is low compared with levels of representation in Britain's population (nationally about 7.1% of the economically active population (those in employment or seeking employment) have a limiting long-term illness - 2001 Census). Within job bands the representation of disabled staff decreases as band increases, with the exception of band 2.

Reviewing and developing future Disability Equality Schemes

We will review workforce data about recruitment, promotion and performance appraisal, consider progress made against the action plan and information from our annual staff attitude survey.

We will consult and involve stakeholders in the review and development of future schemes, our individual staff networks and trade unions.

Duties under the Disability Discrimination Act 1995, as amended by the Disability Discrimination Act 2005, and the Code of Practice on the duty to promote disability equality⁶

General duty

The Disability Discrimination Act 1995, as amended by the Disability Discrimination Act 2005, places a

general duty on public authorities to promote disability equality. This means that, in carrying out their functions, HSC/E must have due regard to the need to:

- promote equality of opportunity between disabled persons and other persons;
- eliminate unlawful discrimination;
- eliminate harassment of disabled persons that is related to their disabilities;
- promote positive attitudes towards disabled persons;
- encourage participation by disabled persons in public life;
- take steps to take account of disabled persons' disabilities, even where that involves treating disabled people more favourably.

Specific duties

To help meet the general duty, HSC/E also have specific duties. These fall into two categories.

Covering policy development and service delivery

- To produce and publish a Disability Equality Scheme demonstrating how we intend to fulfil the general and specific duties and involve disabled people in the development of the Scheme. The Scheme must include an action plan setting out the key actions we will take to promote equality, assess functions and policies, or proposed policies relevant to the general duty.
- To assess and consult on the likely impact of proposed policies on the promotion of disability equality.
- To monitor policies for any adverse impact on the promotion of disability equality.
- To publish the results of these assessments, consultation and monitoring.
- To report annually on the progress of the action plan.
- To review the Disability Equality Scheme every three years.

Covering our role as an employer

- To gather information on our disabled staff in relation to:
 - applications for vacancies;
 - development; and retention.

Assessment of functions and policies

We have identified the following functions and policies as relevant to the general duty on disability and prioritised them for future action.

Functions and policies affecting all

High relevance to disability equality

- Publication and promotion of information regarding workplace risks etc, including website, leaflets and advice.
- Promotion of our messages through the media.
- Advice on occupational health and safety.
- Operational guidance (publications and instructions).
- Risk assessment.

Moderate relevance to disability equality

- Working with other departments and organisations.
- Consultation on new policy.
- Promotional initiatives and events.
- HSL research.
- Development of guidance, Codes of Practice and legislation.
- Legal interpretation.

Low relevance to disability equality

- Forensic service to HSE.
- Procurement.
- Permissioning and licensing.

Functions and policies affecting our staff

High relevance to disability equality

- Performance appraisal.
- Performance management.
- Provision and support internally of information technology and communication technologies and other support.

Moderate relevance to disability equality

- Staff training.
- External recruitment.
- Internal vacancy filling and promotion.
- Absence and ill health management.

Low relevance to disability equality

- Pay and conditions (excluding performance-related pay).
- Grievance procedures.
- Disciplinary procedures.
- Pensions and retirement.
- Exit monitoring.
- Travel and subsistence expenses.
- Trade union representation of HSE staff.
- Internal health and safety.

Disability equality action plan 2007-2008

Priorities

For everyone

	By whom?	When?
<ul style="list-style-type: none"> ■ To secure effective communication with disabled people by launching the new-model Communications Toolkit to key communications staff. 	Communications Directorate	Nov 2006
<ul style="list-style-type: none"> ■ To develop risk assessment guidance in partnership with the Disability Rights Commission. 	Policy Group	Mar 2007
<ul style="list-style-type: none"> ■ To issue revised information and guidance to HSE field staff on providing health and safety advice to employers regarding the retention of disabled workers. 	Policy Group	June 2007
<ul style="list-style-type: none"> ■ To promote use of the HSE's Management Standards for work-related stress. 	Policy Group Workshops Targeted support	Feb 2007 May 2007 - April 2008
<ul style="list-style-type: none"> ■ To develop and issue advice for managers on how to help people at work suffering from mental health issues connected with work-related stress and how to help those absent from work with such conditions. 	Policy Group	April 2007
<ul style="list-style-type: none"> ■ To promote a more disability-positive health and safety culture, by promoting the 'reasonable adjustment' principles contained in the guidance to the Display Screen Equipment Regulations. 	Policy Group	Jan/Feb 2008
<ul style="list-style-type: none"> ■ To develop networks with disability groups and secure involvement of disabled stakeholders in policy development and monitoring. 	Policy Group	Build and establish in 2007
<ul style="list-style-type: none"> ■ To work towards improving the diversity of our advisory bodies. 	Policy Group	2007/8

For our staff

<ul style="list-style-type: none"> ■ To improve performance management to support the career development of disabled staff at all levels. 	Human Resources Division	March 2008
<ul style="list-style-type: none"> ■ To review the vacancy filling arrangements to ensure that disabled staff are not disadvantaged. 	Human Resources Division	June 2007
<ul style="list-style-type: none"> ■ To consolidate improvements made to management of the performance appraisal system to ensure that disabled staff have equal opportunity to high performance awards. 	Human Resources Division	March 2007
<ul style="list-style-type: none"> ■ To review and revise, where necessary, provision of and support for information and communications technologies, within a new accessibility policy. 	Business Services Division	Dec 2006 and ongoing

Gender Equality Scheme

Forward look: Priorities for action

Following consultation and the review of policies and functions, the following priorities have been agreed:

For everyone:

- encourage more involvement **of women in health and safety decision-making** by working with others, such as the TUC, to persuade more women to volunteer to become safety representatives or representatives of employee safety;
- work towards improving the **diversity of our advisory bodies**;
- review and consolidate the international **research on gender sensitivity** in workplace health and safety;
- include **pregnancy-related risk assessment** in a Fit3 campaign in 2007/8;
- review and further develop our **website on gender factors**.

For our staff:

- improve performance management to **support and promote the career development opportunities** of women, particularly to increase representation at higher job bands;
- steer through the programme of **pay reform** in the current (2005-2008) three-year deal period to help close equal pay gaps.

Details of the part of HSC/E with responsibility for taking forward the priorities and timescales for action are given in the **Gender equality action plan**.

Employment data

The key baseline data is:

- women have been in the lower job bands (bands 4-6) for longer than men, and in the more senior job bands (bands 1-3) for less time;
- women tend to be in three disciplines: administration (52%), general inspector (20%) and scientific (9%). There are very few women in the specialist pay disciplines, some of which attract higher rates of pay;
- further, women are older than men in job bands 5 and 6, but younger in all the other job bands;
- relatively more women at job bands 0-4 joined HSE and more men at bands 5 and 6;
- at job bands 1-4 there was virtually no difference in the relative percentage of women promoted compared with men, but at bands 4 and 5 relatively more men were promoted;

- pay gaps in HSE are reducing, but there are still differences in the average pay of men and women.

Internally, the key issue remains representation of women at senior levels of the organisation. Table 2 shows the representation of women, at 1 April 2006.

Job band	Women		Total staff
	No	% of staff in band	
SCS	12	23.5	51
1	29	22.8	127
2	126	20.7	609
3	476	36.7	1298
4	278	50.7	548
5	405	69.9	579
6	621	72.5	856
Total	1947	47.9	4068

Table 2: Female staff by job band (at 1 April 2006)

Table 2 shows that there are virtually equal numbers of women and men in HSE, but women are concentrated in the lower job bands, and representation falls away steadily as job band increases to job band 1.

Consultation

An internal working group was set up to oversee and advise on development of the Disability and Gender Equality Schemes. Members included our Board Champions for disability, women and race.

We consulted those people and organisations who had an interest in diversity and health and safety.

Pay statement

HSE is committed to equal pay and eliminating unjustified pay gaps. Since 1999 we have been working to close pay gaps by increasing progression pay to enable staff to move to the top of their pay range more quickly. In 2005 we agreed a three-year pay deal with our trade unions that will eventually reduce the time it takes staff to reach the top of their pay ranges from 10 years to 8 years.

Reviewing and developing future Gender Equality Schemes

We will review workforce data about recruitment, promotion and performance appraisal, consider progress made against the action plan and information from our annual staff attitude survey.

We will consult and involve stakeholders in the review and development of future schemes, our individual staff networks and trade unions.

Duties under the Sex Discrimination Act 1975, as amended by the Equality Act 2006 and Code of Practice on the duty to promote gender equality

General duties

The Sex Discrimination Act 1975, as amended by the Equality Act 2006, places a general duty on public authorities to promote gender equality. This means that, in carrying out their functions, HSC/E must have due regard to the need to:

- eliminate unlawful discrimination and harassment; and
- promote equality of opportunity between women and men.

Transsexual people are protected from discrimination and harassment on the grounds of gender reassignment in employment and vocational training under existing sex discrimination legislation. Public authorities are legally required to take this into account when addressing that part of the gender duty, which requires the elimination of unlawful discrimination and harassment.

Specific duties

To help meet the general duty HSC/E also have specific duties.

- To prepare and publish a gender equality scheme showing how we will meet the general and specific duties and setting out our gender equality objectives.
- To consult employees and stakeholders (including trade unions).
- To gather and use information on how our policies and practices affect gender equality in the workforce and delivery of our services.
- To consider the need to include objectives to address the causes of any gender pay gap.
- To assess the impact of our current and proposed policies and practices on gender equality.
- To implement the actions set out in our scheme within three years, unless it is unreasonable or impracticable to do so.
- To report annually on the progress of the scheme.
- To review the gender equality scheme every three years.

Assessment of functions and policies

We have identified the following functions and policies as relevant to the general duty on gender and prioritised them for future action.

Functions and policies affecting all

High relevance to gender equality

- HSL research.

Moderate relevance to gender equality

- Working with other departments and organisations.
- Consultation on new policy.
- Promotional initiatives and events.
- Operational guidance (publications and instructions).
- Risk assessment.

Low relevance to gender equality

- Publication and promotion of information regarding workplace risks etc including website, leaflets and advice.
- Promotion of our messages through the media.
- Advice on occupational health and safety.
- Procurement.
- Permissioning and licensing.
- Development of guidance, Codes of Practice and legislation.
- Legal interpretation.

Functions and policies affecting our staff

High relevance to gender equality

- Performance appraisal.
- Performance management.

Moderate relevance to gender equality

- Internal vacancy filling and promotion.
- Pay and conditions (excluding performance-related pay).
- Absence and ill health management.

Low relevance to gender equality

- Staff training.
- External recruitment.
- Internal health and safety.
- Grievance procedures.
- Disciplinary procedures.
- Pensions and retirement.
- Exit monitoring.
- Travel and subsistence expenses.
- Trade union representation.
- Provision and support internally of information technology and communication technologies and other support.

Gender equality action plan 2007-2008

Priorities

By whom?

When?

For everyone:

- | | | |
|--|---|---------------------|
| <ul style="list-style-type: none"> ■ To encourage more involvement of women in health and safety decision-making by working with others such as the TUC to persuade more women to volunteer to become safety representatives or representatives of employee safety. | Policy Group | 2007/2008 work plan |
| <ul style="list-style-type: none"> ■ To work towards improving the diversity of our advisory bodies. | Policy Group | 2008 |
| <ul style="list-style-type: none"> ■ To include pregnancy-related risk assessment in a Fit3 campaign in 2007/8. | Operations
Communications
Directorate | 2007/2008 |
| <ul style="list-style-type: none"> ■ To review and further develop our website on gender factors. | Policy Group | 2007/2008 work plan |
| <ul style="list-style-type: none"> ■ To review and consolidate the international research on gender sensitivity in workplace health and safety. | Policy Group | 2007 |

For our staff:

- | | | |
|--|-----------------------------|-----------------------------|
| <ul style="list-style-type: none"> ■ To improve performance management to support career development of women at all levels, particularly to increase representation at higher job bands. | Human Resources
Division | On-going. Reviewed annually |
| <ul style="list-style-type: none"> ■ To steer through the programme of pay reform in the current three-year deal to help close equal pay gaps. | Human Resources
Division | On-going. Reviewed annually |

Appendix 1 Diversity progress against the eight key priorities in 2006

1 Raising awareness amongst all staff of the business benefits of diversity; the Board's Vision for diversity and the need for further progress in HSE.

- HSE Board members have **championed the diversity agenda** through chairing the Diversity Steering Group and the Women's, Race and Disability staff networks.
- We held a **major workshop** on disability, gender and age to communicate key research and best practice findings. **Keynote speakers** came from the Disability Rights Commission (DRC), the Trades Union Congress (TUC) Gender and Occupational Health and Safety (GOSH) forum, the Health and Safety Laboratory (HSL) and the European Agency for Health and Safety.
- We have prompted **dialogue and debate** through local office briefing sessions ('Exchange Briefings') on diversity and articles in our internal publications.
- We celebrated **Black History Month** by holding events jointly promoted by MAGNET, our Black and Ethnic Minority Staff Network, and our External Diversity Team.

2 Build and make better use of the evidence base in our policies and operations, for example on stress and ethnicity and on differential patterns of ill health among different ethnic groups.

- We have established a statistical evidence base relevant to workplace health and safety demographics. This is an **important resource** for our policy-makers and service-providers.
- We have commissioned our Health and Safety Laboratory to undertake literature **reviews** of existing evidence. We intend to use these reviews to inform policy development and our diversity strategy.

3 Design interventions to take account of different needs and impact on particular groups (such as older workers) and so help improve health and safety outcomes.

- We are working in partnership with the DRC to develop joint principles on a **disability-sensitive risk management** approach.
- We piloted our **Impact Assessment Tool** and, in response to the feedback, further refined the tool before launching it this year.
- We are working to ensure our **website and intranet continues to** meet high standards of **accessibility**. Our website remains in the top UK Government websites.

4 Reach out to people/organisations with particular understanding of diversity, to improve our policies and delivery (eg how best to influence ethnic minority owned/managed businesses) and to ensure our advice and information is widely accessible (eg for migrant workers).

- We asked the Central Office of Information (COI) to review how effective our communications are in reaching our diverse audience. From this we have built a **diversity communications toolkit** and **translation standard**. These provide cultural and disability awareness and also practical advice for communications teams and authors to help them identify and best engage their audiences.
- We contributed to a cross-government initiative, led by the Department for Trade and Industry (DTI) to bring together information on rights for **new and expectant mothers**. This was published in October 2006 as guidance for both employers and employees. It is also available on our website.
- Our injuries reduction programmers have worked with disabled people to help identify the impact of injury (particularly falls). Our noise and vibration programmers have worked with the National Institute for the Deaf to give information about the effect on hearing and with Raynaud's Syndrome organisations about vibration-related injuries and conditions.
- HSL is piloting a searchable database to find solutions. This will focus on issues such as reasonable adjustments for work-related disability and chronic occupational health problems.
- We are making sure that the most important issues are covered in our new and revised publications. For example:

Managing sickness absence and return to work: An employer's and manager's guide contains information about making workplace adjustments with examples and case studies.

Working safely in a multicultural food and drink industry,⁷ is available in several languages to meet the needs of the diverse workforce in that sector.

5 Diversity of the workforce: as part of the workforce strategy continue to improve the diversity of our workforce and increase the representation of underrepresented groups by ensuring that recruitment reaches out more widely and by promoting HSE's image as an organisation where people from diverse backgrounds can prosper and progress.

We have made some progress, but there is still much to do to make HSE more diverse.

- We continued to seek recruits from under-represented groups for both specialist and standard jobs by careful use of advertising media and selection processes. Some recruitment campaigns have been more successful than others.
- We encouraged the use of our flexible working arrangements to accommodate staff with domestic and caring responsibilities or lifestyle choices. There has been an increase from 11% to 17% in the number of staff who work part-time.
- We have improved support to staff with disabilities via our occupational health provider, including facilitating access to therapeutic intervention for staff where appropriate.

6 Career development: continue and develop positive action to enable under-represented groups to develop the skills to progress upward more quickly.

- There are improved rates of promotion for underrepresented groups from middle to senior job bands, but promotion rates are lower for staff at bands 5 and 6.
- We encouraged directorates to use more systematic arrangements to review the career development needs of individual staff, including using local career review groups to arrange internal job moves.
- We ensured the vacancy filling arrangements did not inadvertently discriminate against any group of staff by challenging vacancy adverts on unnecessary selection criteria and through training for panels.

7 Encourage and support the existing networks for women, disability and ethnic minorities, and the establishment of others.

To help take forward diversity over the last year we have:

- supported the establishment of a Women's Network;
- revitalised Equal, the disability network;
- encouraged MAGNET (minority action group network).

8 Reward good behaviour, and tackle unacceptable behaviour, wherever it occurs.

- Board members have published personal diversity objectives.
- Staff with line management responsibilities include objectives relating to supporting and developing their teams.
- Nominations for high performance awards should demonstrate how the person put forward has demonstrated HSE's values.
- Our HR guidance provides clear guidance on dealing with issues of unacceptable behaviour.

References

- 1 *The Disability Discrimination Act 1995* The Stationery Office 1995 ISBN 0 10545095 2
- 2 *The Equality Act 2006* The Stationery Office 2006 ISBN 0 10540306 7
- 3 *Making the stress Management Standards work: How to apply the Standards in your workplace* Leaflet MISC714 International Stress Management Association 2005 (single copy free or priced packs of 15 ISBN 0 7176 6157 1)
- 4 *Managing sickness absence and return to work: An employer's and manager's guide* HSG249 HSE Books 2004 ISBN 0 7176 2882 5
- 5 *Work with display screen equipment. Health and Safety (Display Screen Equipment) Regulations 1992 as amended by the Health and Safety (Miscellaneous Amendments) Regulations 2002. Guidance on Regulations L26* (Second edition) HSE Books 2003 ISBN 0 7176 2582 6
- 6 *The duty to promote disability equality: Statutory code of practice England and Wales* Disability Rights Commission 2005 ISBN 0 11 703605 6
- 7 *Working safely in a multicultural food and drink industry* Northwest Food Alliance publication available on line at www.nwfoodalliance.co.uk

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