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# Report to Partnership Pre Meeting 9 April 2015

#### **PUBLIC SECTOR EQUALITY DUTY**

## **Equalities**

#### INTRODUCTION

In November 2007 the Board approved the HITRANS Equalities Scheme which outlined our responsibilities and an Action Plan from 2007 to 2010. This is published on our website.

HITRANS, as a Regional Transport Partnership, has had a statutory requirement to comply with requirements associated with Race Equality, Disability Equality and Gender Equality legislation and also tackle discrimination on age, religious and sexuality grounds. These requirements have now been replaced by those in the Equality Act.

The Equality and Human Rights Commission produced guidance in 2012 on how public authorities can meet the requirements of the Equalities Act 2010 and the Equalities Act 2010 (Specific Duties) (Scotland) Regulations 2012. At the Partnership meeting on 26 April 2013 the Board approved two reports for publication on 30<sup>th</sup> April 2013. These were:

- Mainstreaming the Equality Duty
- Equality outcomes

#### Reporting requirements for the Public Sector Equality Duty

The specific duties were created by secondary legislation in the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012.

The specific duties include requirements to publish information and progress reports in 2015.

HITRANS are therefore required to publish the following reports:

- A mainstreaming report;
- Annual employee information together with details of the progress made in gathering and using the information to better meet the duty;
- A report on progress made towards achieving equality outcomes published in 2015;
   and

For each of these duties public authorities should report within two years of their last publication. So for HITRANS this means we are required to publish a progress report on each of these reports by 30 April 2015.

## **HITRANS 2015 PUBLICATION UPDATE**

The implementation of equalities policies is an ongoing process rather than simply the requirement to publish a specific scheme. Equal opportunities are at the heart of the HITRANS ethos and we do intend to meet our statutory duties in this regard. It has to be

recognised that we are also a very new authority with limited resources and the scope of any scheme should reflect this.

Two reports are required to be published by 30<sup>th</sup> April 2015.

Mainstreaming the Equality Duty. This report is to include the following; Show how equality becomes part of the structures, behaviours and culture of an authority Demonstrate how, in carrying out its functions, it is promoting equality Mainstreaming equality contributes to continuous improvement and better performance.

Equality outcomes. This report is to:

Define a set of equality outcomes which it considers will enable the authority to better perform the general equity duty.

Draft versions of these reports are enclosed in the Appendices, outlining the contents of the reports to be published.

#### Recommendation

1. The Board notes the contents of this report and approves the draft "Mainstreaming of Equality Duty" and the "Equality Outcomes" reports as a basis for publishing them by the 30<sup>th</sup> April 2015.

Risk	impact	Comment
RTS delivery	-	Supports the RTS focus on guaranteeing equal opportunities and, in particular, the observance of the equal opportunities requirements.
Policy	V	These Policy documents provide a framework for the Partnership to manage risk.
Financial	V	No financial implications.
Equality	V	These Policy documents are designed to apply fairly and equally to all staff and provide a statement of compliance with requirements of the Act.

**Report by:** Ranald Robertson **Designation:** Partnership Director

**Background Papers:** Appendix A and Appendix B

Date: 8<sup>th</sup> April 2015

### Appendix A – Mainstreaming of Equality Duty



#### MAINSTREAMING THE EQUALITY DUTY

#### **INTRODUCTION**

Transport is an area where inequalities in access and provision for different sectors of society can have significant effects. Transport is the glue that binds so many different activities for us all and if equal access to transport is not available then it can lead to a range of other manifestations of inequality. Some relevant issues are recorded below with particular relevance to the transport sector.

According to the National Travel Survey, in 2011, females made 5% more trips than males (981 per year compared to 935), this difference is highest in the 30-39 age group where females make 22% more trips than males. However, males travelled 24% further than females, averaging 7,573 miles a year compared with 6,105 miles respectively.

Since 1995/97 the average number of car driver trips by men has fallen by 18% and average distance travelled fell by 16%. This compares to an 11% increase in car driver trips and a 23% increase in distance travelled by women. However, men still drive nearly twice as many miles per year than women (4,480 miles compared to 2,433).

Travelling by car forms a large proportion all individuals' personal travel, in 2011 it ranges from 47% for those aged 17-20 years to 72% for 50-59 year olds, and these account for 61% and 85% of the distance travelled respectively. Males make more car driver trips overall than females (435 per year compared to 361); however this is not the case in all age groups. Females aged between 17 and 49, made more car driver trips than males, while males aged 50 and over made significantly more car driver trips than females

Cycling is most prevalent among men than women (23 trips person per year compared to 8 trips). However, cycling only makes up 2% and 1% respectively of their total trips. Women make more bus trips on average than men (74 trips per person per year compared to 54 trips).

The proportion of trips made by bus was highest among those aged 17-20, accounting for 15% of all trips in this age group. Bus use was higher for those aged 60+ than in middle age groups, particularly among females, reflecting the availability of concessionary travel for older passengers and differences in driving licence holding across age groups. Women of all ages used buses more than rail, but men aged 30-39 used rail more than buses, reflecting the more widespread use of rail among commuters.

In 2011, 49% of trips to and from school by primary school children (aged 5-10) were made on foot. The proportion of trips by car for these children was 43%. Among secondary school children (aged 11-16) in 2011, 38% of school trips were on foot and 22% were by car. For secondary school children, the proportion of trips by bus (including school bus/coaches) was 33% in 2011 and 3% were by bicycle.

Car travel accounts for the greatest proportion of trips and distance travelled in every income quintile group. Households in the highest income quintile travel just over 3 times further by car than the lowest income quintile.

Use of public transport is also related to income. From the lowest to highest income quintile, the average number of trips by bus decreases (100 bus trips per person per year in the lowest income quintile compared with 32 bus trips in the highest). However, rail use is highest in the top income quintile with just over 3 times more rail trips and 3 and half more rail miles than the lowest quintile.

According to the Scottish Household Survey in 2011, Forty six per cent of households in the 15% most deprived areas of Scotland as defined using the Scottish Index of Multiple Deprivation have at least one car available to them compared with around three-quarters (74%) in the rest of Scotland.

Just over two-thirds (67%) of adults hold a full driving licence with a higher proportion of males (76%) holding a licence as compared to females (60%). The percentage with a full licence peaks for females within the 35 and 44 age group (76%) and for males between the ages of 45 and 59 (86%). There are significant differences between driving licence possession amongst most age groups for males and females, however these are most pronounced in those aged 60 and over. Around 29% of females aged over 75 have a licence compared with 67% of males

People with a disability or long-term illness are less likely to hold a full driving licence compared to people who report no disability/long-term illness.

Adults from minority ethnic groups are markedly less likely to hold a driving licence) than white ethnic groups.

Adults with a disability or long-term illness are more likely to use a local bus service than those with no disability or long-term illness.

Women make more use of local bus services than men.

Pensioners are more likely to use local bus services than other adults.

## **EQUALITIES DUTIES**

The Equality and Human Rights Commission have now produced guidance on how public authorities can meet the requirements of the Equalities Act 2010 and the Equalities Act 2010 (Specific Duties) (Scotland) Regulations 2012.

The Equality Act 2010 defines "general equality duties" which are as follows;

- Eliminate unlawful discrimination, harassment and victimisation and other prohibitive
- Advance equality and opportunity between people who share a relevant protected characteristic and those who do not
- Foster good relations between people who share protected characteristic and those who do not.

The Act also sets out that:

- Meeting different needs includes (among other things) taking steps to take account of disabled peoples disabilities
- Fostering good relations means tackling prejudice and promoting understanding between people of different groups

 Meeting the general equality duty may involve treating some people more favourably than others.

#### **SPECIFIC DUTIES**

The specific duties are the steps required to deliver the general duties as outlined above. The general actions required are;

- A mainstream report (which includes employee information) to be published no later than 30<sup>th</sup> April 2015
  - This report is to include the following;
    - Show how equality becomes part of the structures, behaviours and culture of an authority
    - Demonstrate how, in carrying out its functions, it is promoting equality
    - Mainstreaming equality contributes to continuous improvement and better performance.
- Equality outcomes report, prepared using involvement and evidence to be published no later than 30 April 2015.
  - This report is to;
    - Define a set of equality outcomes which it considers will enable the authority to better perform the general equity duty.

#### **MEETING OUR DUTIES**

Identifying the functions and policies relevant to equality.

HITRANS is the Highlands and Islands Transport Partnership HITRANS is the statutory Regional Transport Partnership covering most of the Highlands and Islands (Highland Council; Moray Council; Orkney Islands Council; Comhairle nan Eilean Siar and parts of Argyll and Bute). HITRANS was brought into being under the terms of the Transport (Scotland) Act 2005 in December of that year.

HITRANS is currently a Model 1 partnership having the statutory duty to develop a Regional Transport Strategy for its area. At present, although HITRANS has other powers this remains its only duty under the 2005 Act and HITRANS has not moved towards seeking additional powers to allow it to move to a service delivery role. Consequently HITRANS remains a very small organisation with a total of only five staff.

The current establishment comprises:-

- Director
- Partnership Manager
- Partnership Manager
- Office Manager Inverness
- Office Manager Lairg
- Active Travel Officer
- Public Transport Information Officer
- Graduate Business Support Officer

HITRANS is assisted in carrying out its functions by the provision of Human Resources and legal services by Comhairle nan Eilean Siar and Finance Services by The Highland Council.

These services were agreed by resolution of the HITRANS Board and in effect form service agreements with the Councils concerned.

Since December 2005, HITRANS has concentrated on its primary duty to provide and implement a Regional Transport Strategy (RTS).

At present, HITRANS is responsible for funding projects through its revenue budget and through bidding for funds from the Scottish Government, European Union and organisations such as Sustrans. In 2014/15 the Revenue Budget was £0.722m. In addition to this budget external funding amounting to £1,217,766 was secured from the following funding sources:

EU Funding - £147,000

Sustrans Active Travel Partnership - £100,000

Community Links Funding - £605,000 (to be drawn down as required on delivery of projects). Scottish Government Bus Investment Fund - £365,766

### **HITRANS Regional Transport Strategy (RTS)**

The RTS contains a range of objectives, policies and proposals that are designed to promote equality of access to transport for all sectors of the community from the disabled and the socially excluded, as a result of multiple social deprivation, to those who do not use public transport for fear of personal security e.g. women. It also seeks to provide equality of opportunity to access transport no matter where one lives.

The overall objectives of the Strategy are

- Economy,
- Accessibility,
- Environment and
- Safety and Health

with the objective for Accessibility being particularly relevant to equality issues.

As required by Scottish Government, the Delivery Plan associated with our RTS is being reviewed to bring it in line with the current capabilities of HITRANS and this review will be published later this year.

#### **Equal Opportunities**

A core policy of the RTS (Policy 25) is to: "Encourage equal opportunities and, in particular, the observance of the equal opportunities requirements."

The RTS is available on our website www.HITRANS.gov.uk

## **Employment Duty**

Advice on human resource issues is provided to us by Comhairle nan Eilean Siar who have developed their own comprehensive Equality Scheme. Therefore any advice supplied is compliant with our equalities requirements.

As a result we have made significant progress on a number of fronts and have developed, approved, published and applied policies and procedures on:-

Capability

- Data Protection
- Disciplinary Procedures
- Equal Opportunities Statement and Policy
- Family Leave
- Flexible Working
- Grievance
- Sickness and Absence Procedure
- Violence and Aggression Policy
- Training
- Terms and conditions of Employment
- Stress Prevention Policy
- Smoke Free Policy
- Severance
- Retirement
- Relocation
- Recruitment
- Public Interest Disclosure
- Public interest (Whistle Blowing)
- Mobile and Landline Communications Policy
- Policy on Media Contact
- Performance Appraisal
- Information Management Policy
- Home Working
- Fraud and Corruption Policy
- Fire action plan
- Emergency Action
- Drug and Alcohol
- Diversity and Equality
- Anti Bribery
- Adverse Weather Guidance
- Accidents and Incidents at work
- Health and Safety
- Grievance Policy and Procedures
- Recruitment
- Risk Management Policy
- Code of Conduct

In applying equal opportunities in our recruitment procedures, we carry out monitoring of the candidates and have provided a web based application documentation that allows applications electronically and allows large print access. This allows us to identify any bias in the selection process and allows those with disabilities to apply more easily.

The building that we currently use for our offices has level access but we need to carry out a DDA compliance audit of our premises to ensure all issues have been considered.

## Assessing and consulting on the impact of our policies;

#### Assessment

The Regional Transport Strategy was developed and assessed in line with STAG (Scottish transport Assessment Guidance) principles with Summary Assessment Table presented in Appendix D of the strategy.

The STAG process examines the strategy in terms of Economy, Accessibility, Environment, and Safety and Health indicating the overall impact of the strategy in these areas. The process identified that improving public transport accessibility by improving the availability, facilities, and affordability of public transport as key issues.

#### Consultation

A comprehensive consultation was carried out as part of the development of our RTS as described in our Report of Consultation and is published on our web site.

Stakeholder consultation was carried out at three key stages of the development

Problem and issue identification – to ensure that all the relevant issues were identified. Objective setting and prioritisation – to ensure that there was agreement on priority of issues Draft Strategy – a wide spread consultation on the draft strategy with a comprehensive analysis of comments and how they were taken on board within the final strategy.

Throughout the process numerous organisations representing the interests outlined below were sought.

Health	Safety	Mobility	Commerce	Employment
Cycling	<b>Emergency Services</b>	Education	Bus	Heritage
Walking	Economic Dev.	Environment	Rail	Freight
Tourism	Road	Leisure	Education	
Young People	Air	Shopping	Elderly	

#### Monitoring policies for any adverse impact on equalities;

Built into the RTS is a monitoring plan associated with specific targets. A monitoring report is reported to our Board on an annual basis within our Annual Report.

Most of the monitoring measures relate to accessibility, which in terms of equality is an important issue but there are other issues related to equality that could also be monitored.

As previously mentioned there is a policy that requires an equality audit on all relevant interventions. This requires further definition.

All reports reported to our Board require comment to be made on equalities issues to ensure Board members are aware of any equalities issues.

# **Employment Duty**

We carry out monitoring of the candidates as part of our recruitment process and have provided a web based application documentation that will allow applications electronically and allow large print access.

In general the monitoring processes need to be reviewed to ensure equality issues are fully recognised and possibly examine a cost effective way providing access to information in various languages.

# Publish the results of assessments, consultation and monitoring:

The Mainstreaming the Equality Duty Report and Equalities Outcome Report will be published on our web site.

Proposals related to the Equalities Outcome report will be reported through our Annual Report. The Annual Report will include reference to equalities issues and proposals and will allow updating where required.

Our annual report is published on our web site. It includes a specific section on equalities.

The implementation of equalities policies is an ongoing process rather than simply the requirement to publish specific reports.

## Ensuring employees are aware of their duty to promote equality.

All our policies relating to employment and the strategy are available on our server. They are also subject to reports to the Board which again are available on our web site.

Employee policies are circulated for comment prior to finalisation to allow comments to be made.

# **Appendix B – Equalities Outcome Report**

# **Equalities Outcome Report**

To ensure that equality issues are fully addressed, the following list has been prepared identifying potential outcomes acknowledged during the initial analysis of our functions and working environment and subsequently how these outcomes will be achieved and by whom. This list is based on our Action Plan which was developed in 2007 with updates on progress on the outcomes identified and introducing new outcomes where relevant.

# **Policy Related**

Proposed Outcome	Action	Action	Plan	Accountability	Comments
		Timescale	•		
To provide a forum for consultation on HITRANS policy	After consulting with Partner Council Equalities Officers it was agreed that Councils would report back to HITRANS on transport equality issues raised in their Forums. This is facilitated through the Permanent Advisors Group.	Ongoing		Director / Advisors	All Council Equalities officers consulted and engaged in discussion as to how best to integrate HITRANS actions with those of individual Councils. It was agreed that a regional forum was likely to be ineffective due to the size of the area and that each Council should consider transport agencies through their individual forums and report back through the PAs any issues identified. Equalities Item included on Agenda of all PA's Meetings as a result.
An equality audit procedure for proposed initiatives and projects	Develop and implement a procedure.	During 201	5	Director / Partnership Managers	Not yet fully developed but will be a feature in our forthcoming RTS refresh.

Proposed Outcome	Action	Action Plan Timescale	Accountability	Comments
A monitoring process that specifically identifies equality issues	Identify equality issues and relative monitoring requirements	Ongoing	Director	Monitoring reported in the Annual Report
Define proposals for addressing equality issues	Include proposals in our annual business plan	Ongoing	Director	Proposals included in Annual Business Plan
Monitor and report progress on equity issues	Include a report on progress in our Annual Report	Ongoing	Director	Progress reported in our Annual report
All documents produced by HITRANS to be accessible to all sectors of the community	Make available a translation / Braille facility for any published documents as necessary.  Provide large text/speech facilities for documents upon request.	Ongoing work,	Director / Office Manager (Dalcross)	No requests for translations of Braille or large scale text/speech facilities received to date.
Promote improved accessibility for those dependent on public transport	Support will be encouraged in the improvement of all aspects of bus services (services, vehicle quality, fares, infrastructure, bus rapid transit, and integration) as a means of reducing congestion and enhancing accessibility.	Ongoing work outlined in RTS Delivery Plan	Director / Partnership Managers	Loss of Capital budget has reduced capability to take action on this policy. Significant improvements have been progressed through our BIF projects which are improving accessibility of bus services and information.  Our focus in this area will be refined in the RTS refresh.
Improved public transport affordability	HITRANS will support intervention where affordability is recognised by the Partnership as a barrier to the use of public transport.	Ongoing	Director / Partnership Managers	Removal of capital funding has limited capability to take action on this policy. HITRANS still supports this area through our Business Plan programme and

Proposed Outcome	Action	Action Plan Timescale	Accountability	Comments
				we have supported the case for more affordable transport services through this and delivered improvement through our successful bids for external resources.
Improved public transport accessibility for deprived communities	HITRANS will seek to ensure that communities with poor access to employment by Public Transport and low car ownership / high deprivation will be the subject of targeted measures to address this.	Ongoing	Director / Partnership Managers	HITRANS has developed an accessibility tool to assist each member Council in monitoring the level of access to public transport across their area and provided training to Council employees on its use.  HITRANS has developed a car share web portal for the region.  HITRANS worked with partners at Highland Council and Robert Gordon University to support an innovative taxi share pilot in a rural community in the Highland area.
Improved accessibility for rural peripheral communities	In selecting interventions as part of the RTS, HITRANS will seek to pay particular regard to the need to reduce problems caused by peripherality in remote rural, island and other areas of the region that are less well served by Public Transport.	Ongoing	Director / Partnership Managers	Accessibility is one of the measures monitored by the RTS Monitoring and evaluation framework when fully developed

Proposed Outcome	Action	Action Plan Timescale	Accountability	Comments
Improved accessibility for those with no access to a car	Where improvements in accessibility are found to be required the RTS will seek to promote delivery by enhancing conditions for pedestrians, cyclists and public transport users (including community transport / DRT.)	Ongoing	Director / Partnership Managers	Removal of capital funding has limited capability to take action on this policy.  HITRANS supports this area through our Business Plan programme.  Active Travel Audits completed for all settlements designated in the RTS as Regional Centres.  HITRAMS BIF projects are supporting this area of delivery.  Bus Investment Fund opportunities will continue to be investigated.
Equal opportunities audit of all interventions	All interventions will be subject to an equal opportunities audit to ensure that they promote equal opportunities in accordance with the law.	Ongoing	Director / Partnership Managers	Removal of capital funding has limited capability to take action on this policy.  HITRANS will work with those tasked with delivering RTS Delivery Plan Interventions to ensure Equal Opportunities Audit takes place in advance of delivery.
Improved access to Public Transport for those with mobility problems.	HITRANS will seek to ensure that people who have difficulties in using conventional public transport due to disability will be the	Ongoing	Director / Partnership Managers	HITRANS officers work closely with health, Council and voluntary sector to improve integration of specialist transport services

Proposed Outcome	Action	Action Plan Timescale	Accountability	Comments
	subject of targeted measures to address this.			
Improved access to health facilities by Public Transport for patients, visitors and employees.	HITRANS and its constituent authorities work in partnership with Health Boards to improve access to health services.	Ongoing	Director / Partnership Managers	As above
Enhanced security particularly for women who are discouraged from using public transport by personal security concerns.	There will be a presumption in favour of schemes that enhance personal security, especially for pedestrians, cyclists, and public transport users.	Ongoing	Partnership Managers	Removal of capital funding has limited capability to take action on this policy. In the past HITRANS has funded improved lighting and CCTV cameras to support this agenda.  HITRANS BIF projects will improve the environment at a number of bus stops with provision of shelters, lighting and accurate information.
Quality audit of all interventions by HITRANS to ensure needs of all aspects of the community are addressed.	All projects and interventions will be subject to a quality audit to ensure they maximise opportunities to meet all RTS objectives. The quality audit will ensure that the needs of all groups are given due consideration in the assessment and design of RTS measures.	Ongoing	Director / Partnership Managers	Removal of capital funding has limited capability to assess and design RTS projects.  No specific actions being progressed at present
Ensure equalities issues are considered in project justification/ prioritisation	Include equalities section in project prioritisation for future funding consideration of	Ongoing	Director / Partnership Managers	Part of the project initiation process since Jan 10

Proposed Outcome	Action	Action Plan	Accountability	Comments
		Timescale		
	projects.			
Ensure equalities progress is reported to the board annually	Include a section in annual progress report on equalities	Ongoing through Annual Report	Director / Partnership Managers	Included as part of Annual Report
Ensure equalities issues are integral to our future planning	Include section on equalities in the annual business plan	Ongoing	Director / Partnership Managers	Equalities item on all agendas of Advisors Meetings and Equalities Impacts considered within all Partnership meeting reports.
HITRANS communications encourage equalities	Audit HITRANS publications to ensure equal access by all	Ongoing	Director / Partnership Managers	No negative comment received on HITRANS publications.
Promote access to HITRANS for all sectors of the community	Participate in events designed to promote equal opportunities	Ongoing	All staff	
Ensure that in HITRANS communications all aspects of society are treated equally	Audit HITRANS publications to ensure that the image portrayed gives equal emphasis to men and women, includes images of ethnic minorities and includes images of people with disabilities as integral with society.	Ongoing	All staff	

# Office Related

Proposed Outcome	Action	Timescale	Success Indicators/ Measures	Accountability	Comments
To have an appropriate operational Equalities Scheme	Identifying the functions and policies relevant to equality. Consult with the general public, Local Authorities & Board Members regarding the Equality Scheme and action plan to ensure all equality objectives are appropriate and relevant	Ongoing	Draft Scheme to be submitted to Equal Opportunities Commission, following which, Consultation arranged, responses to be collated and reported in the form of a comprehensive scheme to Equal Opportunities Commission	Director / Office Manager (Dalcross)	Scheme submitted to the Commission December 2007  Reporting annually within Annual report
Ensuring employees are aware of their duty to promote equality	Create induction programmes for new staff once polices approved by the Partnership board	Ongoing	Induction programme to include session on equality and diversity	Director	Induction programme in place for new staff
Ensuring employees are aware of their duty to promote equality	Consult with HITRANS staff on the Equalities scheme	Ongoing	Scheme approved by the Partnership Board in November 2007.	Director	Scheme approved by Partnership Board and available on website.
Monitoring policies for any adverse impact on equalities	Ensure equality is included in contracts and procurement policies, and that they are monitored	Ongoing	Equality referenced in procurement policies	Director	Equality Statement implemented and included in all tender and procurement documents
Publish the results of monitoring	To have a fully searchable Database to monitor and assess.	Ongoing	Analyse data and publish within Annual Report	Director	Annual report published to website including RTS Monitoring.

Proposed Outcome	Action	Timescale	Success Indicators/ Measures	Accountability	Comments
Ensure equalities issues are actively considered within the workplace	HITRANS Equal Opportunities Policy to be approved by the Partnership Board	Ongoing	Ongoing assessment of the policy and monitoring of any complaints	Director / HR Support	Policy provided by CNES HR Support.
To ensure no gender discrimination with regards to dependants staff may have	To offer Maternity, Paternity & Adoption Leave	Ongoing	HITRANS Maternity, Paternity and Adoption policies to be approved by the Board	Director / HR Support	Policy provided by CNES HR Support.
To have an equalities based recruitment & selection process	Design the application form to demonstrate gender / racial / disability anonymity	Ongoing	HITRANS Recruitment Policy to be approved by the Partnership Board	Director / HR Support	Policy provided by CNES HR Support.
To ensure that the HITRANS emergency action plans take in to account equality issues	Fire Action plan implemented to ensure the safety of those less mobile or disabled	Ongoing	HITRANS Fire Action Plan Policy in place with regular staff training.	All staff	Fire Action Plan approved by Graham and Sibbald (landlord's agents) and implemented
Monitoring policies for any adverse impact on equalities	Review all Office Policies & Procedures to ensure equality is included	Ongoing	Ensure any amended policies are approved by the Board	Director	