



Recruitment & Workforce Diversity Annual Report

January – December 2021

Diversity & Inclusion Team

Devon & Somerset
Fire & Rescue Service

March 2022



Recruitment & Workforce Diversity Annual Report

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Document Control

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Sign-Off List

Name	Position
S Scott	Director of Finance, People and Estates
M Sobey	Co Head of People Services

Distribution List

People Strategy & Inclusion monitoring group
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1. Introduction

Section 149 of the Equality Act 2010 provides for the general public sector equality duty. This requires public authorities to have due regard to the need to:

- eliminate discrimination, harassment and victimisation;
- advance equality of opportunity between people who share a protected characteristic and those who do not;
- foster good relations between people who share a protected characteristic and those who do not.

The duty requires Public bodies to publish equality information pertaining to the makeup of its workforce on an annual basis and covers all the protected characteristics including gender, disability, ethnic group, religion and sexual orientation.

The analysis within this report covers Gender, Disability, Ethnicity, Sexual Orientation and Religion for the following:

- Current staff composition, new starters, promotions, unpaid leave and leavers
- Applicants for jobs (uniformed, non-uniformed, Support, Control) advertised in the data period

For guidance on the Equality Act 2010 please see www.gov.uk/equality-act-2010-guidance and www.equalityhumanrights.com.

DSFRS procurement guidance sets out expectations to our potential providers and publishes this report to adhere to these requirements and provide an example.

LEVEL 1 – MINIMUM STANDARDS Firms of 5 or more employees		LEVEL 2 – MINIMUM STANDARDS Firms of 50 or more employees		LEVEL 3 – MINIMUM STANDARDS Firms of 150 or more employees	
1	Provide a written equality policy which covers at least: recruitment, selection, training, promotion, discipline & dismissal, and (a) victimisation, discrimination & harassment, making it clear that these are disciplinary offences within the firm; (b) identification of the senior position with responsibility for the policy and its effective implementation; (c) communication of the policy to staff.	5	Written instructions to managers and supervisors on equality in recruitment selection, training, promotion, discipline & dismissal of staff and other relevant HR policies such as Pregnancy & maternity, work-life balance policies etc. These can be instructions for general opportunities in employment.	9	Regular consultation on equality issues within the workforce
2	Where a contractor is carrying out the functions of DSFRS the contractor must meet the same standards as DSFRS, including the undertaking the Specific Duties, regardless of the size of the contractor.	6	Training in equality, diversity and inclusion for managers and staff.	10	Regular diversity monitoring of selection transfer, training, promotion, discipline and dismissal – and bullying and harassment
3	Effective implementation of the policy in the firm's recruitment practice, to include open recruitment methods such as the use of job centres, careers service or press advertisements Regular monitoring of the number of job applicants from different groups (covering the protected characteristics)	7	Monitoring of: - <ul style="list-style-type: none"> • The numbers of job applicants for employment from different groups. • The numbers of employees from different groups, by grade and section. 	11	Mention in the firms recruitment advertisements and publicity literature of its arrangements for offering equal opportunities. Publish Equality monitoring information
4	Regular Reviews of the policy and commitment to meet the appropriate level of the standard following any recruitment which increases the size of the organisation.	8	If monitoring reveals under-representation of particular groups, action to check that criteria 1-3, & 6-7 are being used effectively in the organisation and to have an action plan in place.	12	If monitoring (as in criteria 7 and 10) indicates under-representation of any group take action to check the criteria 1-3, 5, 6, 9 and 11 are being used effectively within the firm and if not, take appropriate advice. Take appropriate action (including positive action as a result of that advice)



2. Methodology

This report has the purpose to identify any potential equality issues within recruitment, retention and promotion.

Diversity data for applicants is captured in the 'Talentlink' Recruitment system and data for new starters, promotions/transfers and leavers is recorded in the 'Workforce' personnel system. Data is extracted for the purposes of regular monitoring and scrutiny. Reports can only be created by certain members of the People & Culture team who are cleared for access to this confidential data. Written reports are always in anonymous format and where it is possible to identify an individual, data will be generalised to a format where this is no longer possible.

Diversity monitoring in order to monitor progress of under-represented groups through the various stages is undertaken for all Firefighter recruitment processes in relation to several characteristics. Monitoring this data is not mandatory. Other recruitment workflows are not currently actively monitored in relation to protected characteristics for the stages in between application and starting employment.

Gathering Diversity information from staff is done at the start of employment by extracting data from the 'Talentlink' recruitment system and recording those details on the 'Workforce' system. Throughout employment with the Service, staff can change or add data by using an "app," which allows all employees to check and amend their details very easily, with reminders sent every 6 months to update.

Benchmark figures for 2020/21 are taken from the data used to support the Communities and [Local Government Association](#) returns which were last updated October 2021.

Data is correct as of 7/1/2022. Only valid data has been analysed. No data gaps have been identified. Some vacancies were still open for applications at the time of data extraction.

The word 'On Call' has been used within the data tables. This is our group of 'On Call' staff who respond to a station when incidents occur. They are usually self-employed or have a primary employer who releases them for the time it takes to resolve the incident.

'Wholetime' are our group of fulltime Firefighters, working 42 hours per week.

'Minority ethnic group' means all ethnic groups, including people of colour, other than UK white, including Irish, European, Australian etc.

'People of Colour' (PoC) means Black, Asian, mixed and 'other'.

The recruitment system uses 4 classifications for vacancies;

- 1 On Call
- 2 Wholetime
- 3 Promotion/Transfer/Development
- 4 Support, which includes Control



3. Summary of key observations

The key findings identified in this set of data are:

- For a second year in a row the pandemic has influenced recruitment of external people into operational roles, especially in the first part of 2021, as recruitment events and assessments were unable to take place or had significantly reduced capacity. On Call had 97 new starters (89 in 2020), compared to 170 in 2019 and 138 in 2018. Wholetime recruitment was less affected.
- There was another reduction in female On Call new starters, which with 10 was 4 less than the previous year. Together with 6 new female Wholetime staff starting in the same period and 18 women leaving operational roles (12 On Call and 6 Wholetime), our female representation dipped following the highest recorded in 2020.
- Both in the On Call and Wholetime groups, the female turnover is 17.1%. In Wholetime that is twice the level of male turnover (8.3%) and in On Call nearly one and a half times (12.1%).
- The attraction rate from female applicants for Support vacancies near enough reflects the community.
- The female application percentages of 14.1% for Wholetime and 17.7% for On Call are higher than the representation in the workforce (6%) and higher than in 2020 (10.8% and 16.6%).
- Since 2018, percentages of female applicants in the On Call group have increased significantly, 7.4% to 17.7% but in 2021 this has not led to an increase in new female starters in that group (15.5% in 2020, 10.3% in 2021).
- The numbers of applicants with a minority ethnic background are higher than our community (5-6%) for all externally advertised vacancies other than On Call. However, percentages of new starters in this category are typically less than half the application rate.
- No people of colour were offered an On Call Firefighter position, Professional/Support or Control role despite application rates of 1.2%, 5.5% and 4.3%. For the Professional/Support group this is the second year no people of colour have been appointed.
- The representation of people of colour in the service (0.9%) is nearly 3 times less than in the community (2.6%).
- Application rates from LGB (anything else than Heterosexual) are higher than the community and identification of staff as LGB, with 2.6% identifying within this category, closely reflects the community average of 2.2%.
- Female representation in the senior management team dropped from 21% to 19%.

Actions and plan

In line with the DSFRS Plan, a People Strategy has been implemented and is continuously monitored. Various initiatives are under way and planned to increase the diversity of the workforce in line with the DSFRS plan. Good practice within recruitment, including positive action, is shared and implemented across the Service. Inclusion of ethnic minority staff has become more visible through our active



Multicultural Staff Support Network which drives initiatives and accountability in view of the events in society in relation to racism. The Service continues to monitor the impact of initiatives, including possible racism, through Equality and People Impact assessments. The People Strategy will be reviewed and updated in 2022.

New recruitment processes for operational staff are in place with a particular emphasis on eliminating bias including several anonymous stages at the start. Current progression processes and development pathways, including promotion, are under constant review with new eligibility requirements being considered to create a more level playing field between staff groups and be more inclusive to Support Staff.

Positive action initiatives in relation to development in the form of Action Learning Sets and a Sponsoring programme continue, with completed sets and sponsoring relationships showing good outcomes.

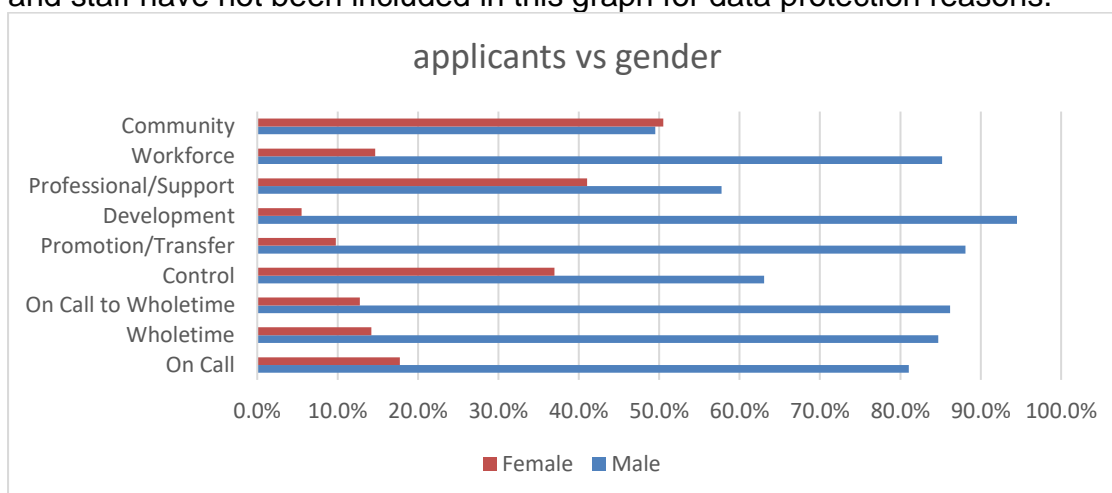
Any positive action work is and will continue to be supported through working closely with the Asian Fire Service Association and the Employer Network of Equality and Inclusion. The Service achieved the Silver Standard in the Talent, Inclusion & Diversity Evaluation of the latter.

4. Recruitment

4.1 general recruitment

In 2021 a total of 3274 individuals applied through the recruitment system for 218 advertised vacancies, of which 164 vacancies were advertised externally. This is nearly 3 times the number of applicants of 2020 and the difference is mainly due to the opening up of the Wholetime process for external candidates (1592) and the increased number of Professional/Support vacancies which were advertised (150% increase in vacancies and applicants).

The graph below shows the vacancy type against applicant gender and the gender percentages for the workforce and the Community. The few transgender applicants and staff have not been included in this graph for data protection reasons.



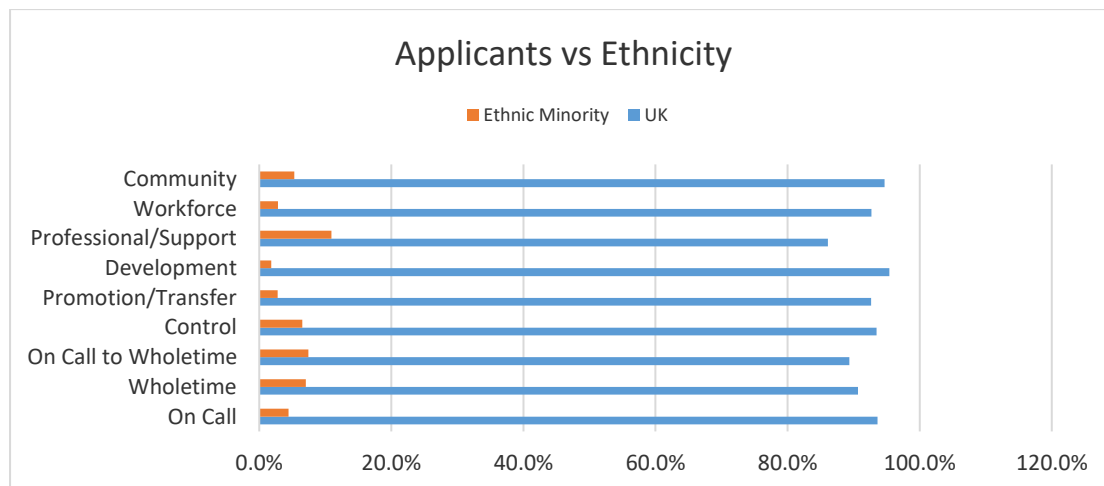
The graph highlights that the Professional/Support and Control application gender balance is very near the gender balance in the working age community.

It also shows a continuing underrepresentation in female applicants in Wholetime and On Call groups. However, the application percentages of 13-14% and 17.7% are higher than in the representation in the workforce (6%) and 1-2% higher than in 2020 (10.8% and 16.6%).

Percentages of female applicants for internal operational vacancies remain low as can be expected in an operational workforce with low female representation.

Since 2018, percentages of female applicants in the On Call group have increased significantly, 7.4% to 17.7% but in 2021 this has not led to an increase in new female starters in that group (15.5% in 2020, 10.3% in 2021). In the Wholetime group, female applicant percentages have increased to around 13%. New starter percentages are at 9%.

The next graph shows the vacancy type against applicant ethnicity and the ethnicity percentages for the workforce and the Community.



The graph shows that for 4 of our 7 vacancy categories, the minority ethnic group applications are above the representation in the Devon & Somerset community (on average 5-6%) i.e. Control 6.5%, Professional/Support 10.9%, On Call to Wholetime 7.4% and Wholetime 7%. The percentage of ethnic minority applicants for Support vacancies is more reflective of representation in urban areas (Exeter 10-11%, Plymouth 7-8%) where most of those vacancies are based. Ethnic minority [representation in the Southwest](#) was 8.2% in 2011.

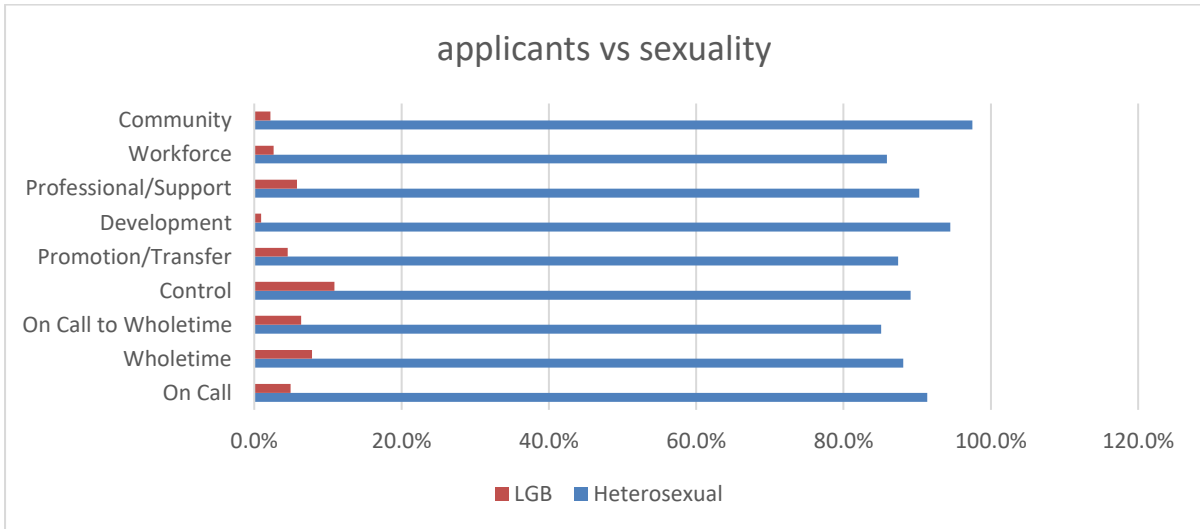
No people of colour were offered an On Call Firefighter position, Professional/Support or Control role despite application rates of 1.2%, 5.5% and 4.3%.

In the Promotion/transfer group, which involves mainly internal/Fire Service applicants, the percentage of ethnic minority applicants (2.8%) is the same as the



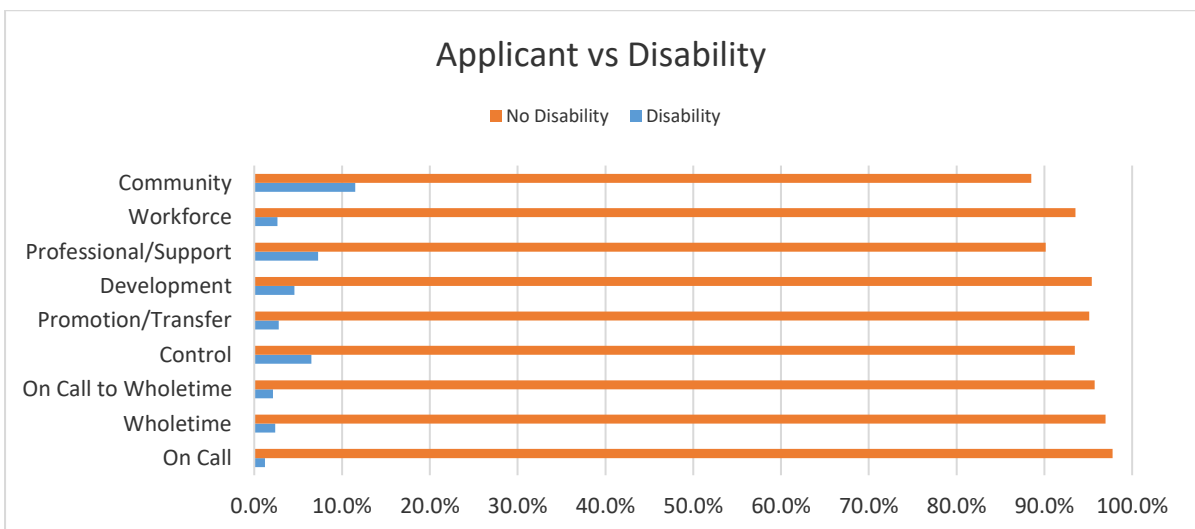
representation in the workforce as a whole. 1.8% of those promoted either temporary or permanent identified as having a minority ethnic background. In this group people of colour had a 0.8% representation, with the workforce at 0.9%, but no people of colour were promoted.

The next graph shows the vacancy type against applicant sexual orientation and the sexual orientation percentages for the workforce and the Community.



From the graph it is apparent that the application rates from LGB individuals in all vacancy groups, except 'Development' are a lot higher than the community (2.2% in 2018). Even the Workforce percentage is similar to that of the community and hiring percentages indicate a healthy balance (3.8%). This is despite the 'non-disclosure' rates in the various groups.

The next graph show the vacancy type against applicant disability status.



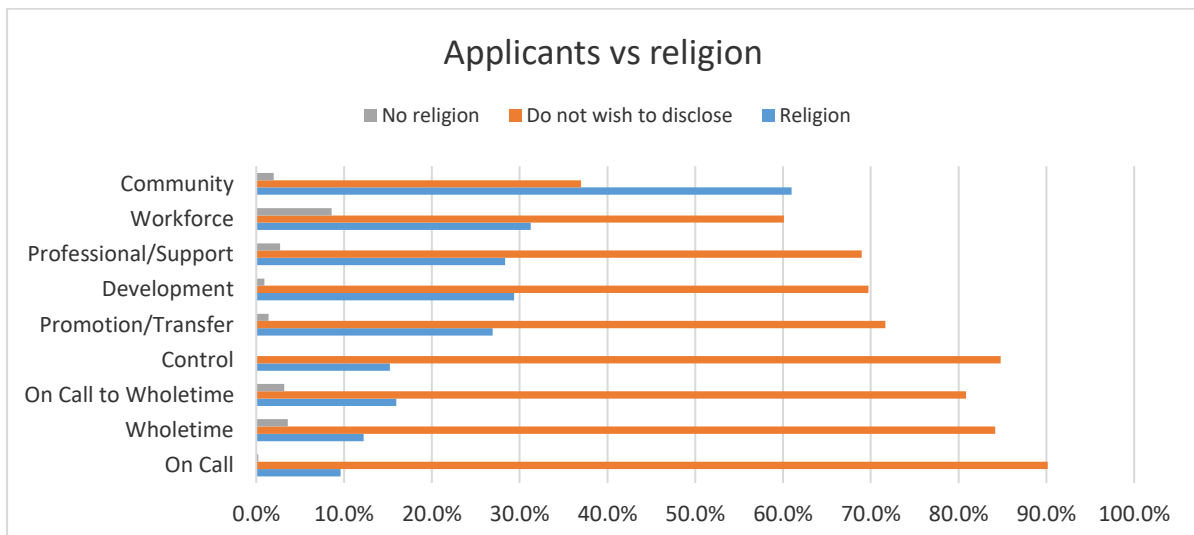
According to the ONS Labour market status A08, in the community 11.5% of people of working age live with some sort of disability and are economically active. There

are more disabled women than men in the UK. People from white ethnic groups are almost twice as likely as people of colour to have a limiting long-standing illness or disability.

Disabled people are less likely to be in employment. In April 2021 [research](#) was published, which indicated that 52.3% of disabled people were in employment, down from 54.1% a year previously. The employment rate for people who are not disabled was 81.1%, down from 82.2%. The unemployment rate for disabled people was 8.4% in October-December 2020, up from 6.9% a year previously. This compared to an unemployment rate of 4.6% for people who are not disabled.

Considering the workforce consists of 2.6% people with recorded disabilities, the percentage of 'Development' applicants, which are mainly internal, was 4.6%. This may indicate that those with a disability may be slightly more inclined to seek a development opportunity.

The below graph shows the vacancy type against applicant religion.



The main observation in relation to the religion figures is how many applicants (80-90%) and staff (69%) indicate they have no religion or don't disclose it. This makes it difficult to say anything around equal opportunity in access to or taking up of employment on the basis of religion.

Non-disclosure rates	applicants	new starters
Disability	1.3%	1.7%
Ethnicity	2.6%	2.9%
Sexual orientation	4.4%	6.8%
Religion	2.6%	4.6%

It is clear from the table above that the non-disclosure rates are low. This is a good indication that people are equally comfortable disclosing their characteristics, including sexuality.



4.2 Wholetime recruitment

Wholetime Firefighter recruitment took place from our On Call staff and from external applicants. The latter recruitment opened again for the first time since 2017. Most operational management positions, which were advertised, were also open to external competent Fire & Rescue personnel.

Opportunities for On Call staff members to take up a Wholetime position were also provided through the promotion process.

Two hundred and twenty-six external women applied for the position Wholetime Firefighter, 14.2% of all applicants. Of the On Call staff who applied for a Wholetime Firefighter position, 12 were female (12.8%). These percentages are more than twice as high as the female representation in either the Wholetime or On Call staff group.

Sixty-six people started a Wholetime contract. Of these starters 9.1% were female.

Three percent of the new starters in this group identified as belonging to a minority ethnic group (including 1.5% people of colour), despite 7.1% of the applicants recording as a member of a minority ethnic group (including 3.2% people of colour). 5% of new starters indicated they consider themselves as having a disability and 6% of new starters identify as LGB, both well above staff representation.

4.3 On Call recruitment

Seventy-two women applied for positions at On Call stations which were recruiting. The total applicants in 2021 was 406, slightly less than 2020 and the female representation was 17.7%, which is 1.1% higher than 2020 and 3.6% higher than in 2019 (14.1%). 10.3% of new starters were female, 5% less than in 2020, and all On Call recruits start at Firefighter level.

4.9% of applicants recorded as LGB, 4.4% as being a member of a minority ethnic group and 1.2% indicated they considered themselves to have a disability. For the new starters the percentages were respectively 1%, 1% and 0%.

The numbers of undisclosed diversity data in applicants (1-3%) and in new starters (0-3%) is low and there is not much difference between recording rates of the different characteristics.

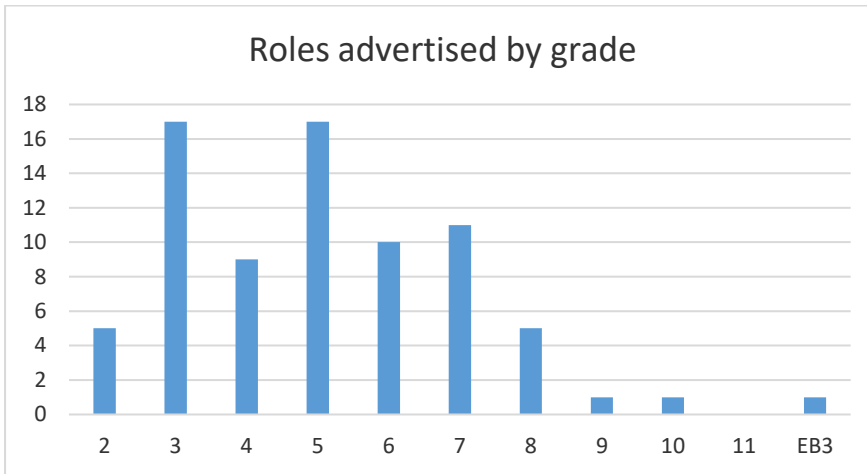
4.4 Support Staff recruitment

In 2021 741 people applied for 78 advertised positions. Fifty jobs were advertised as permanent and 26 as temporary opportunities. A further 2 were casual or variable hours contracts.

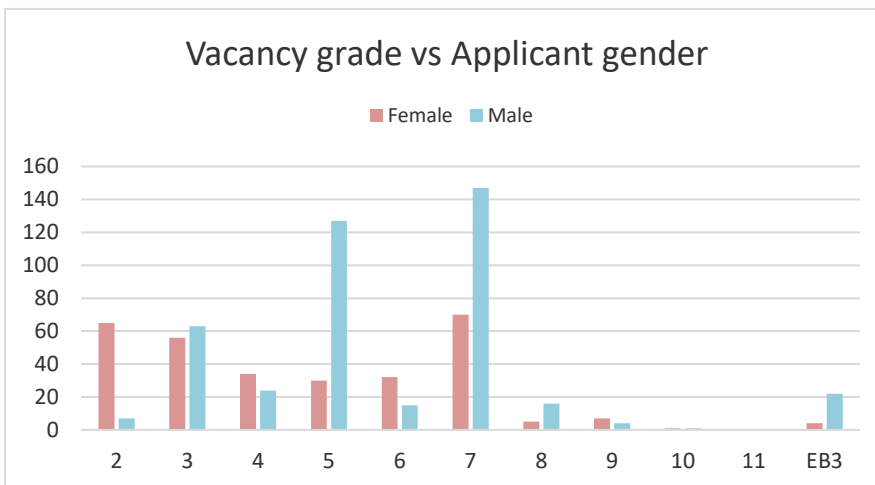
The attraction rate for Support vacancies from female applicants (41%) is slightly below the percentage of women of working age in employment (50.5%), and less than 2020 (47%). This may be because of the amount and type of Support Staff vacancies advertised in 2020. On the other hand, 47% of the new starters were female with most of them starting in supervisory roles.



The graph below shows the number of jobs advertised per grade.



Almost all roles with grades 2 and 3 are either apprenticeships or of an administrative nature, with grades 4-9 being more subject specific and requiring specific knowledge and/or experience. Grade 10 and above are of strategic level and EB grade roles are within the Executive Board.



Grade 3 and 9 jobs attracted fairly similar amounts of male and female applicants, grade 2, 4 and 6 vacancies had more female applicants than male and grade 5, 7, 8 and EB level had more than twice the number of male applicants than female.

Of the 48 jobs advertised within grades 2-5, 8 had all or virtually all female applicants and 10 had all or nearly all male applicants.

The amount of LGB applicants in this group (5.8%) is higher than in 2019, and more than twice the representation in the workforce and the community. 5.9% of new starters identify as LGB.

Of the applicants, 10.9% identified as belonging to minority ethnic group, which is reflective of communities like Exeter and Plymouth and well above the Southwest



region (8.2%) and Devon & Somerset (5-6%). 5.1% indicated they considered themselves to have a disability.

Out of 81 applicants who identify as a member of a minority ethnic group (including 41 people of colour) 4 people got hired who identified as 'White Irish/other'. No people of colour started employment in this group in 2021.

Applicants with a disability had a 7.3% representation and 4.4% of new starters indicated they considered themselves to have a disability.

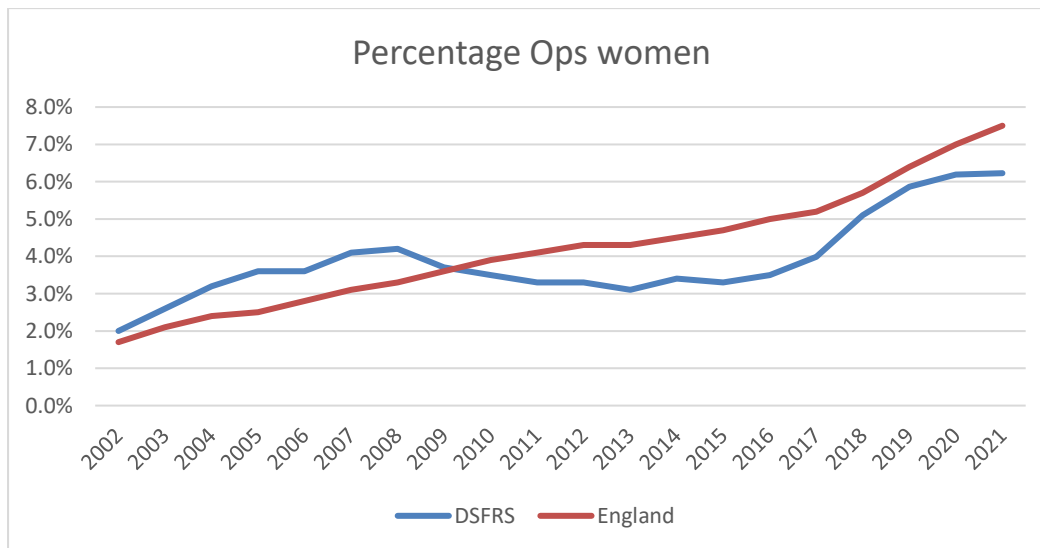
4.5 Control recruitment

All, of three, Control room positions were advertised as temporary and there were 46 applicants. 37% of those were female, 10.9% identified as LGB and 6.5% as a member of a minority ethnic group.

One out of five new starters were female. Other diversity details will not be published due to personal data protection considerations.

5 Workforce diversity profile

Overall, in DSFRS the female representation is 14.7% of the workforce at the end of the period, up from 13.9% at the start. Within the operational categories this proportion was 6.2% for the On Call group and an increase from 6.2% to 6.3% for the Wholetime staff. Nationally, these percentages are 6.5% (On Call) and 8.0% (Wholetime). We have 31 stations without any women on the team.



The proportion of female staff in the Support staff group increased slightly to 47% and in the Control staff group it decreased from 75% to 72.5%.

Not considering the 4.5% of individuals who have chosen not to state their ethnic background, currently the Service's workforce consists of 2.8% ethnic minority staff, slightly up from the beginning of the period when it was 2.7%. The Control staff

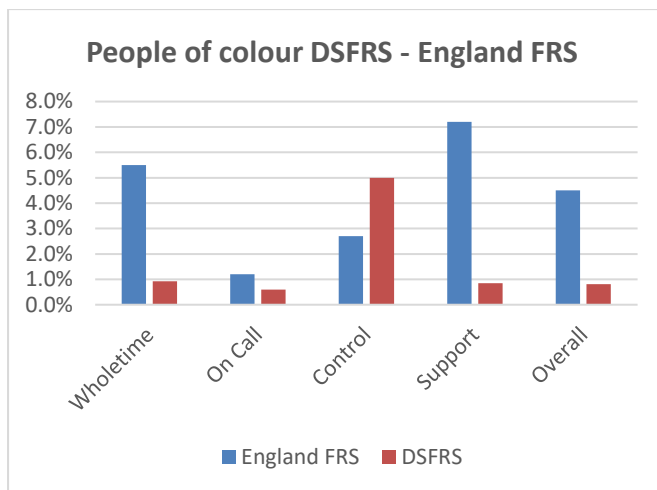


group is most diverse with regards to minority ethnic representation with 7.5% and 0% 'not stated'. The Support Staff group is the next highest with 4.6% at the end of the period, but with 'not stated' of 5.7%. The English Fire & Rescue Service average of 'not stated' is 9% whilst DSFRS is only half that.

It needs to be noted that the 'ethnic minority' category in the [national FRS figures](#) (table FIRE1104) does not include 'White Other' (groups like eastern Europeans, White South Africans, Australians etc), whilst the DSFRS figures do *include* those groups in the term 'ethnic minority' as they, despite their skin colour, have different cultural backgrounds and on many occasions have English as a second language.

Compared to the English Fire & Rescue Service average of 5.9% (this includes staff who have not stated ethnicity), DSFRS has a much lower diversity when it comes to people of colour. This needs to be considered in view of the community ethnic makeup of the region, which is in general lower than other parts of the country.

For a better comparison, excluding all 'white' groups, the representation of People of Colour (Black, Asian, mixed, other) in the Service is 0.8%. The community percentage in most areas is 1.5-2.5%, but more in urban areas (Exeter 7%, Plymouth 3.8%). In the Southwest, on average, that percentage is 4.6%.



The identification as LGBT (anything other than Heterosexual), with 2.6% identifying within this category, closely reflects the community average of 2.2%. In addition, the 'prefer not to say' rate has reduced to 7.2%. 'Not stated' (where no data has been provided) has further reduced to 4.3%.

Besides on average 3.8% of individuals who have chosen not to state whether they have a disability (visible or invisible), currently 2.6% of the Service's workforce has declared a disability. This is far below the average of 11% within the community.

As expected, considering the physical nature of the role, only 1.8-2.9% of operational staff indicated that they consider themselves to have a disability. Within the Control and Support staff groups percentages are higher at 4.6-5%.



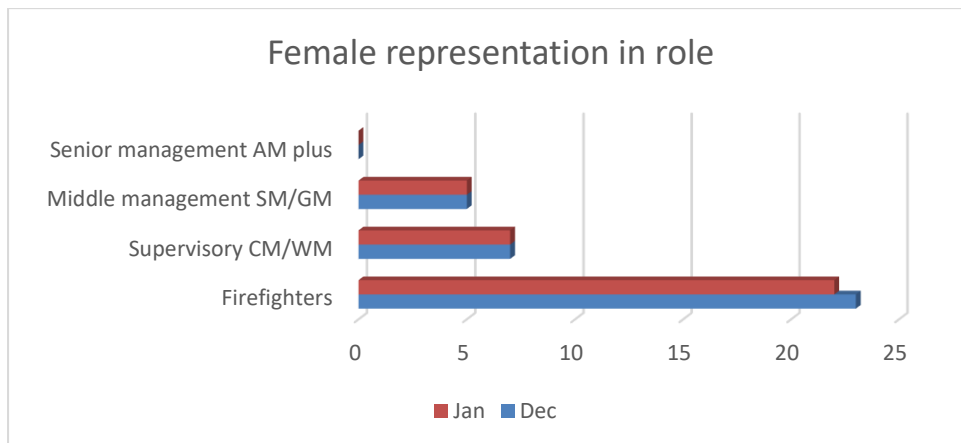
Executive Board and senior management team

In 2021 the Executive Board (EB) existed of the Chief Fire Officer, the Deputy Chief Fire Officer, two Assistant Chief Fire Officers (Director of Service Delivery and Director of Service Improvement), the Director of Finance, People and Estates and the Director of Governance & Digital Services. Of these 6 posts, only one was occupied by a woman for part of the year. Due to the size of the group and data protection regulation, no other diversity characteristics can be released.

The senior management team consists of EB and managers with an Area Manager role or Grade 10 and above. At the beginning of the period the representation of women in this group was 20.8%. During the period 1 woman left posts at Grade 10 and above and two men left, which decreased the percentage of women to 19%. Other diversity parameters showed no significant change.

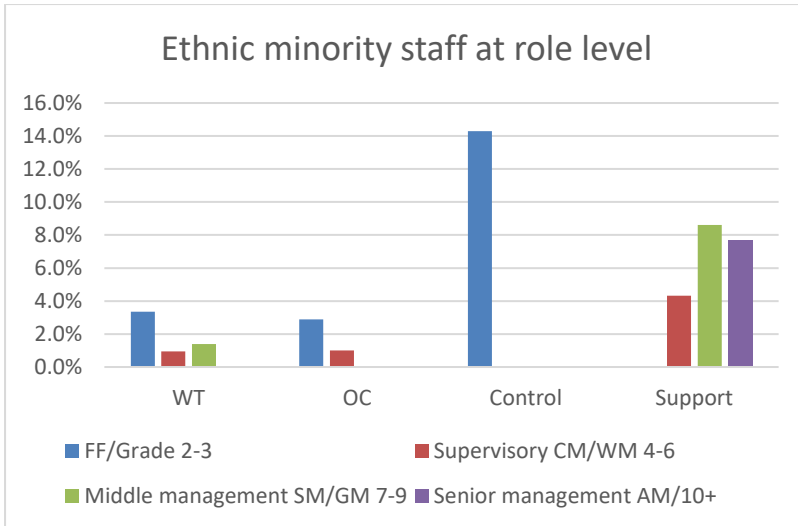
Diversity in other (management) levels

Due to the overall small representation of women in the operational roles, the distribution at different levels shows a declining trend from entry role of Firefighter up to senior management roles. This trend is a result of the Service having no direct entry into uniformed management roles and progression to higher management roles can only be achieved through development time and time in role.



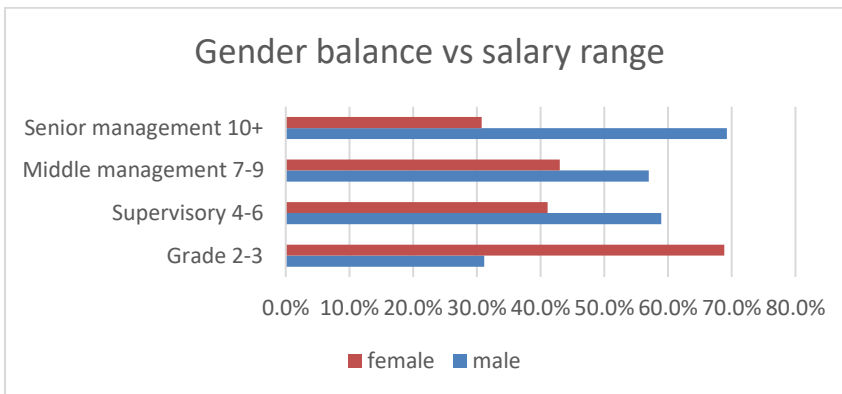
A similar explanation can be used for the distribution of staff with an ethnic minority background in operational posts. Virtually all people of colour are at Firefighter level with none in operational middle management roles.

A different pattern emerges in the Support staff group where there is direct entry to every level and a more even distribution can be found with most staff with an ethnic minority background in middle and senior management.



As entry to Support roles can be at any level, the analysis in this section will only focus on Support roles.

In many organisations it is found that women hold most of the roles at lower grades and men hold relatively more management positions. A similar distribution is found here.



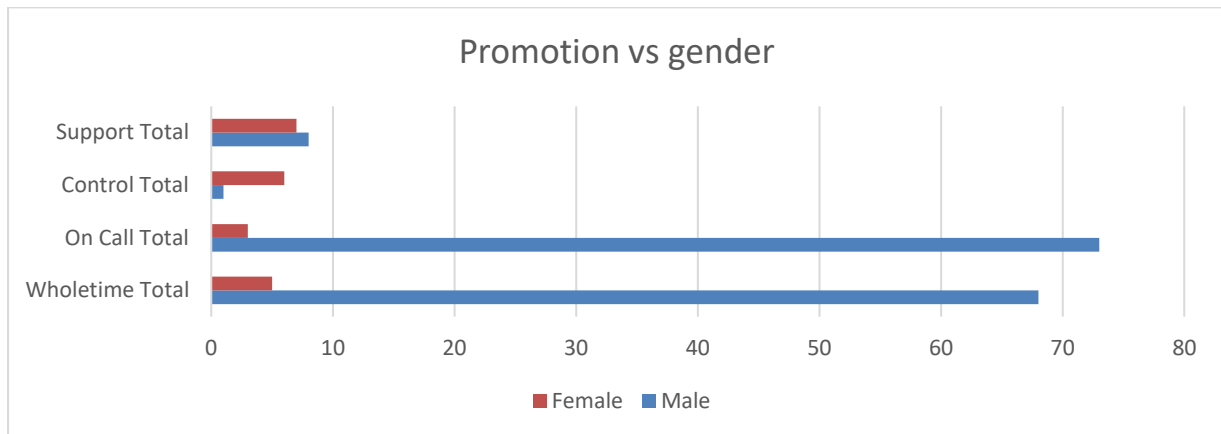
6 Promotion/Transfer

Promotion, whether temporary or permanent, is a regular occurrence within the uniformed roles and part of a career in an organisation with a rank/role structure like the Fire Service. This is much less so within Control and Support roles where the diversity and number of available roles is limiting.

Fifty-seven vacancies were advertised as 'Promotion/Transfer'. These are opportunities for staff to gain a promotion, get access to development in preparation for a promotion or to change job role and/or location. Considering this only relates to staff, the diversity data should at least reflect the staff composition data.

There was a total of 171 promotions in this period across the Service of which 12.3% concerned female staff, 1.8% staff who identified as a minority ethnic group, 1.8% as LGBT and 2.9% who considered themselves to have a disability.

In comparison to the female representation in the group (6.2%), the number of women gaining promotion in the On Call staff group (3.9%), is low. This may indicate the existence of some barriers to progression. For the Wholetime female staff group the promotion rate (6.8%) reflects the representation rate (6.3%).



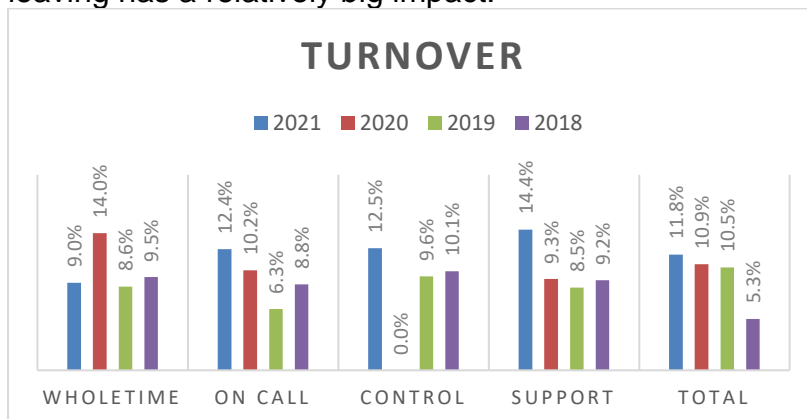
In the Support group, most women were promoted in and into the supervisory level.

'White Other' is the largest minority ethnic group to gain promotion with 1.2% of those being promoted identifying as such. No people of colour were promoted either temporary or permanent in any of the staff groups. This is the same as 2020.

7 Leavers

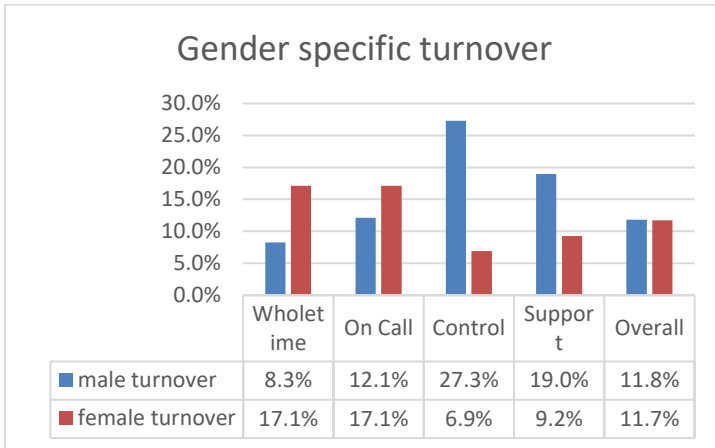
In this period there were 248 leavers; more than last year when 211 people left the Service. The main reason for leaving is voluntary retirement.

The resulting turnover rate is 11.8% over all staff categories, with On Call and Wholetime Staff turnover rates 12.4.% and 9% respectively. Support Staff was 14.4% and Control 12.5%. The latter 2 staff groups are smaller and a few individuals leaving has a relatively big impact.





Male and female turnover is overall balanced, but there are big differences between the staff groups, with female turnover in the operational roles much higher than male turnover, the reverse is true for Support and Control staff. This may indicate retention issues specific to the last 2 years, including changes to the Firefighter Pension Scheme and challenges around the pandemic, as retention levels were around 9.6% in 2019 for both genders within operational staff.



Of the 50 Wholetime leavers, 38% retired and 28% completed their fixed term contract.

In On Call, only 19% left with the reason of retirement. All but 11, of 140, chose to leave voluntarily. After retirement, the biggest group of leavers are for work/life reasons (27), followed by career break (16) and 'personal' (15).

In Support the main reason for leaving is voluntary retirement (13%) followed by resigning for career progression (9.4%). The biggest group of leavers did not state a reason.

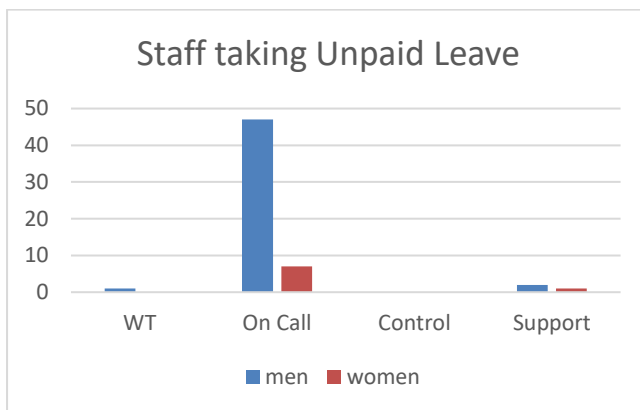
8 Unpaid Leave and Career Breaks

The purpose of the Career Break Scheme is to allow employees to request an opportunity to leave their employment on a medium to long-term basis (normally between six months and 2 years), with the intention of returning to the same or a similar post afterwards. Longer periods may be approved in exceptional circumstances. Shorter periods may be considered as Special Leave. The employee will be considered to have resigned from their post during the career break which means that these figures will appear in the Leavers data.

DSFRS will consider requests for special leave in any circumstances not covered by policies. This might include extending the entitlements for maternity, adoption, paternity, parental or compassionate leave; leave to cover periods of care; leave to cover attendance at rehabilitation centres, or unpaid leave of less than 6 months for the purposes of a career break. The individual normally returns to their previous post/role.

Unpaid Leave and Career Breaks are a regularly used option by the On Call staff Group when they experience periods when they are not able to provide the availability required within their contract due to a (temporary) change in primary employment or personal circumstances. The length of the periods is usually longer in nature. The difference in uptake between men and women could be explained by the fact there are overall more men than women in this staff group.

On Call staff account for 47 occurrences of unpaid leave with an average duration of 116 days, compared to 3 in total by the other staff groups with an average around 60 days. Of the 47 occurrences, 16 were taken as Career Break i.e. more than 6 months



9 Discipline and Grievance cases

In this 12 month period 29 discipline cases were initiated of which 28 concerned men and 28 UK/white. Cases have increased from last period as a result of introduction of a new discipline process, performance management and a capability procedure.

All 13 grievance cases were raised by UK/white individuals, including 2 women. The number of cases has remained constant since 2018.

In total 1 member of staff, male and UK/white, was dismissed for reasons of performance or conduct.



Appendix A Equality duty

The equality duty consists of a general equality duty, supported by specific duties which are imposed by secondary legislation. In summary, those subject to the equality duty must, in the exercise of their functions, have due regard to the need to:

General Duties

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

These are sometimes referred to as the three aims or arms of the general equality duty.

Specific Duties (England)

1. Public authorities to publish information **annually** to demonstrate compliance with the general equality duty.
2. Public authorities to prepare and publish one or more equality objectives it thinks it should achieve to meet the general equality duty. To be done at least every four years.