



**Consumer
Focus**

Campaigning for a fair deal

Single Equality Scheme 2011/2013

March 2011

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1 Foreword

I am very pleased to be able to introduce Consumer Focus's Single Equality Scheme (SES) and associated action plan, which takes effect from 6 April 2011. It will, I believe, be an important document in the remaining period of the organisation's life, influencing our day-to-day work and guiding us as we help shape the future for consumer support and advocacy after our proposed abolition.

All public bodies are quite rightly required to have such a scheme, but there can be few for whom it matters so much as Consumer Focus.

We exist to make sure that all consumers get a fair deal, and we have a statutory duty to advance the interests of disadvantaged people. Consumer Focus and our predecessor bodies have a distinguished record in terms of representing the needs of consumers who are less able to act in their own interests, whether through their own circumstances or the nature of markets and public services.

I am proud of our influence on topics from fuel poverty to payday lending and digital inclusion to JobcentrePlus, as well as how we pick up equality issues within our analysis of areas affecting all consumers. Our Extra Help Unit provides a lifeline service to vulnerable energy and postal consumers, while the Scottish Accessible Information Forum enables disabled people to make informed choices and lead independent lives. But we must not be complacent and this document sets out some tangible ways in which we intend to improve in the two years we have left.

We will embed our new thinking on disadvantage and the work we have been piloting in Consumer Focus Wales on equality issues for policy work. I believe we can break new ground here, acting as an exemplar for others and leaving a legacy for future organisations that will continue our work. We have already revised our corporate planning and project management systems, so we prompt more discussion about equality issues in our annual workplan and when scoping and designing individual projects.

This is a living document and we would welcome all feedback on it and approaches which will help us deliver greater equality for consumers. It is not an add-on to our work, nor a piece of bureaucracy. Rather, it is fundamental to who we are and what we stand for.

Mike O'Connor
Chief Executive
Consumer Focus

2 About Consumer Focus

Consumer Focus is the consumer champion for England, Wales, Scotland and (for postal consumers) Northern Ireland. We operate across the whole of the economy, persuading businesses and public services to put consumers at the heart of what they do.

Consumer Focus gives a strong voice to consumers on the issues that matter to them and works to secure a fair deal on their behalf.

We work with consumers and a range of organisations to tackle the problems customers face and to achieve creative solutions that make a difference to people's lives.

The government has proposed that Consumer Focus should be abolished and some of its responsibilities passed to Citizens Advice and Citizens Advice Scotland – this is scheduled to happen in April 2013, subject to consultation and legislation.

3 Introduction

This is Consumer Focus's first Single Equality Scheme (SES). Through this scheme, we aim to reaffirm and strengthen our commitment to equality and diversity issues as a fundamental component of the work we do. Alongside this, we remain committed to providing an inclusive work environment that values everyone fairly.

This SES sets out our commitments to ensure that our work reflects the diverse needs and experiences of all consumers in the UK. It is a framework that will help us fulfil our obligation to the public sector equality duties.

It will cover the equality duties (race, gender and disability) of legislation in place before April 2011, as well as the new strands (age, gender reassignment, marriage & civil partnerships, religion or belief, pregnancy & maternity and sexual orientation) as set out in the Equality Act 2010, which takes effect in April 2011.

Parallel to and complementing our Equality and Diversity duties, the Consumers, Estate Agents and Redress Act 2007 identifies particular provisions which guide our work, including regard for consumers who are one or more of the following:

- disabled or chronically sick
- of pensionable age
- with low incomes
- residing in rural and remote areas

We accept that all consumers can be disadvantaged at particular times in their life, as a result of personal circumstance which they face, situations they find themselves in, or characteristics of the markets they are in.

This Scheme reflects our realistic ambitions for the future and is an important step forward in demonstrating a commitment to promoting equality and diversity in all that we do.

4 Background: Previous equality duties

Prior to the implementation of the Equality Act 2010, there were three equality duties set out in law, covering Race, Gender and Disability.

- ✓ The Race Relations (Amendment) Act 2000 placed a duty on public authorities to have due regard to the need to:
 - eliminate unlawful racial discrimination
 - promote equality of opportunity
 - promote good relations between people of different racial groups.

- ✓ The gender equality duty was introduced in the Equality Act 2006 requiring public bodies to have due regard to the need to:
 - eliminate unlawful sex discrimination and harassment (including for transsexual people)
 - promote equality of opportunity between men and women.

- ✓ The Disability Discrimination Act 2005 placed a duty on all public authorities to have due regard to the need to:
 - promote equality of opportunity between disabled persons and other persons
 - eliminate discrimination that is unlawful under the Act
 - 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 persons more favourably than other persons.

5 Equality Act 2010: Overview of the equality duty

The Equality Act 2010 introduces a number of measures to strengthen and simplify equality law, including placing a new single Equality Duty on public bodies.

Protected characteristics:

The new duty covers the following eight characteristics:

- ✓ age
- ✓ disability
- ✓ gender reassignment
- ✓ pregnancy and maternity
- ✓ race
- ✓ religion or belief
- ✓ gender
- ✓ sexual orientation
- ✓ marriage and civil partnership

The previous duties covered race, disability and gender. Some aspects of the previous gender duty covered gender reassignment, but the new duty now gives full coverage to this group.

Set out in the Act itself, public bodies will have due regard to the need to:

- **eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited under the Act**
- **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**

6 Context: Equality and diversity in what we do

Equality and diversity considerations impact on Consumer Focus in two key ways: in the substantive work that we do (that is, how we select the issues we work on, how we develop our thinking on those issues, and how we articulate and make available our thinking); and in how we operate as an organisation (our culture, values, processes, etc.).

Consumer Focus as a consumer champion

At Consumer Focus we believe that a crucial part of our work is to listen. We therefore ask a wide range of people and groups for their views about our work, to make sure we take different views into account. Engagement with stakeholders is an important part of gathering evidence on what issues need to be tackled and where we should focus our resources. It is important to us to foster strong relationships with our stakeholders and to recognise the value of their input in defining our priorities.

One of the key ways for Consumer Focus to embed equality considerations into our work is to assess the effect that a policy proposal or decision would have on different groups of people. The information gathered when developing policy proposals or providing services must be analysed to decide whether they could affect groups or communities differently and whether the differences amount to adverse impact or unlawful discrimination. This process enables actions to be taken to eliminate or mitigate any potentially unfavourable effect and, where the effect may be positive, to ensure opportunities for better delivery of outcomes which will promote equality are not missed.

We also take steps to ensure that our work is available and accessible to everyone who is interested in it. Our publications are available in braille, large print and audio CD with additional arrangements for the deaf, hard of hearing or speech impaired on request, and we aim to ensure that all meetings are fully accessible.

Key steps we have already taken over the last period to strengthen our equality and diversity practices include:

- completed an extensive review of how to build equality and diversity considerations into our policy analysis – piloted by Consumer Focus Wales and now being rolled out organisation-wide
- updated all current planning documentation to provide prompts for the consideration of equality and diversity issues, so that these help shape the selection and design of individual policy projects
- delivered equality and diversity training to all staff and Board members
- commissioned reports on defining disadvantage and sustainability as part of a programme to integrate consideration of these components into our work
- reviewed key performance indicators to increase the focus on monitoring our impact on disadvantaged consumers
- begun a review of the corporate style guide against accessibility best practices to identify and implement necessary changes
- implemented a publication practice and guidelines for the Welsh language scheme
- delivered 11 half-day events for advice providers and frontline staff across Great Britain to promote and encourage consumer empowerment through greater use of the free information, support and advice which Consumer Focus provides.

Case study: Consumer Focus Wales workplanning

In developing its 2011/12 annual plan, Consumer Focus Wales put in place an extensive and groundbreaking programme of engagement with some of the most vulnerable and disadvantaged communities in Wales, working with Participation Cymru. Staff received training in facilitation before running 15 events around Wales, each focused on a different group of people. They included: people with learning disabilities, older people, gypsy travellers, recovering alcoholics and drug users, refugees, disabled people, and people living in one of the poorest communities in Europe. This input from people typically ignored by policymakers and official bodies will shape Consumer Focus Wales's priorities for the year ahead.

Consumer Focus as an employer

Consumer Focus strives to be an 'employer of choice,' where people choose to work because we offer equal and inspiring opportunities to everyone. Accordingly, we aim to help and encourage all employees to develop to their full potential so that their talents are fully utilised to maximise efficiency and deliver more impact for less.

We believe that every employee is entitled to a working environment which promotes dignity and respect to all and where no form of intimidation, bullying or harassment is tolerated.

The Consumer Focus Board agrees our Single Equality Scheme. The Board's Human Resources Committee, the Senior Management Team and our Human Resources Department each have a continuous responsibility to monitor and improve our equality and diversity practices. This includes ensuring that there are equal opportunities for all our current staff to overcome any disadvantage and encourage participation, and when we are recruiting, to encourage more applications from groups that are under-represented in Consumer Focus generally or in specific areas of the organisation. Our action plan in section twelve outlines some of the steps we intend to take in the near term to strengthen our efforts in this regard.

Key areas where we already monitor and focus our equality and diversity practices include:

- recruitment, selection, learning & development, promotion, discipline & dismissal
- zero tolerance of bullying and harassment
- communication of equality and diversity practices to all staff members including targeted training on equality and diversity, and bullying and harassment
- monitoring of data on job applications, successful applications, grievances, promotion, dismissal, etc.
- HR policy reviews and implementation of changes
- accessibility of our offices – access to and within our current and future buildings
- salary data analysis to identify any gender pay gap and ensure equal pay for work of equal value.

7 How we developed our Single Equality Scheme

This SES covers all our equality duties and is designed to be able to demonstrate progress and impact.

We recognise the important role that our staff and stakeholders play in the development and implementation of our SES. We engaged staff in the evolution of the scheme prior to publication and seek their ongoing commitment to its implementation, monitoring and development.

Our Northern Ireland national office has its own Equality Scheme and Disability Action Plan. It also completes annual reports for the Equality Commission in Northern Ireland. This scheme complements the Northern Ireland scheme and Disability Action Plan already in place.

In preparing this document and consulting on it, we have of course recognised that it is likely to be in place for just two years, before Consumer Focus is abolished. The consultation is therefore narrower, and the document more focused, than would otherwise have been the case, though this does not in any way diminish the value of this Scheme and Action Plan or our commitment to equality.

8 About our Action Plan

Our Action Plan sets out the actions we are taking – or proposing to take – to deliver our agenda. This scheme is focused on the achievement of tangible outcomes of direct relevance to who we are and what we do, taking into account our responsibilities to all of our stakeholders.

We have identified seven corporate outcomes which apply across Consumer Focus. Some of the things that we will do, for example equality, diversity and cultural awareness training, apply to all business areas of Consumer Focus. Others are specific actions related to the work undertaken in the different areas. All actions are set out in the Corporate Action Plan in section twelve below.

9 Our seven corporate diversity outcomes

Our SES focuses on achieving the following seven corporate diversity outcomes:

1. Equality and diversity are fully integrated into our strategies, services, policies and plans ensuring that our behaviours match our vision
2. Our evidence base provides insight into the diversity of consumers' attitudes, needs and experiences and allows us to focus our resources on areas of greatest disadvantage and inequality
3. Diversity is owned throughout the organisation and all staff know Consumer Focus's equality and diversity duties and how they must behave as Consumer Focus representatives

4. Our services, buildings, publications, documents and web publications are as accessible as possible
5. We establish new ways of educating and empowering consumers to increase equality by placing power in the hands of all consumers, not just those who are already able to act in their own interests
6. Our activities are informed by discussion with, and the involvement of, relevant and diverse stakeholders
7. All of our staff have equal opportunity in all areas of their employment and are treated fairly and with respect.

10 Monitoring

Monitoring and evaluation are essential in assessing our performance both internally and externally.

We will collect information on all strands including race, disability, gender, gender reassignment, sexual orientation, religion or belief, age, pregnancy/maternity and socio-economic. We use this information to check on a regular basis that we are providing fair employment and services for all, and we will make this available to others so that they can be confident in our commitment and action here. Where any inequality is identified we will take action to address it.

We also intend to benchmark our performance using relevant and valid external data sources. We will be reviewing our policies and procedures to ensure that equality and fairness considerations are included. So for example our guidance notes that accompany our working planning procedures will make reference to our obligations under this scheme and our commitment to treat everyone fairly.

The public sector duty also requires a commitment to the review of all current and future policies to ensure they do not have discriminatory impacts (not just to ensure that equality and fairness considerations are included) and where appropriate to conduct equality impact assessments (EIAs).

11 Reporting on progress

We will incorporate diversity reporting into our normal business reporting structure including our quarterly balanced scorecard. Progress reports on our scheme action plan will be provided quarterly to the Senior Management Team and every six months to the Board. These reports should be independently verified and also provided to staff and stakeholders. Consumer Focus will produce and publish a report on progress against the scheme in April 2012.

12 Action Plan

Outcome 1: Equality and diversity are integral to all our strategies, services, policies and plans ensuring that our behaviour matches our vision.

OBJECTIVE	ACTIVITIES	SUCCESS MEASURE	OWNER	Race	Disability	Gender	Gender Reassignment	Sexual Orientation	Religion/Belief	Age	Pregnancy/Maternity
<p>Equality and diversity issues are considered throughout the governance, corporate planning and project management processes</p>	<p>Current planning documentation process is updated with prompts to document the consideration of equality and diversity issues.</p> <p>Collect meaningful disaggregated data in respect of the project, including the consideration and feasibility of boosting specific data sets in respect of protected groups if appropriate.</p> <p>All projects and research reports contain an equality analysis.</p>	<p>Equality and diversity considerations can be shown to have been considered throughout the corporate planning and project management processes and are reflected in all new proposals.</p>	<p>Deputy Chief Executive</p> <p>Head of Secretariat</p> <p>All Staff</p>	■	■	■	■	■	■	■	■

<p>A new framework is implemented for considering issues of disadvantage and sustainability across all our work so that our thinking consistently and robustly identifies detriment and potential solutions to reduce inequality</p>	<p>Generate a set of draft principles regarding the Consumer Focus corporate approach to sustainability and disadvantage.</p> <p>Embed consideration of sustainability and disadvantage issues in all new policy proposals.</p>	<p>Disadvantage and sustainability considerations can be shown to have been considered throughout the corporate planning and project management processes and are reflected in all new proposals.</p>	<p>Head of Disadvantage and Sustainability Directors</p>	■	■	■	■	■	■	■	■
<p>All human resources policies, practices and procedures and are consistent with legislative requirements and best practice relating to workforce equality and diversity</p>	<p>Staff will be consulted on proposed new policies and included in the evaluation of current HR policy and practice. Conduct equality and diversity impact assessments (EDIAs) Equality and diversity issues will be incorporated into all HR functions and will be reviewed regularly.</p>	<p>All HR policies and practices reflect equality and diversity best practices. Evidence of EDIAs having been conducted.</p>	<p>HR</p>	■	■	■	■	■	■	■	■
<p>All current and future policies have no discriminatory impacts</p>	<p>Where relevant, conduct equality and diversity impact assessments (EDIAs).</p>	<p>Evidence of EDIAs having been conducted</p>	<p>Directors</p>	■	■	■	■	■	■	■	■
<p>Procurement is used to promote equality and diversity best practices in third and private sectors.</p>	<p>Integrate equality and diversity into the tender evaluation criteria for consideration of prospective contractors.</p>	<p>Equality and diversity considerations are used when tendering and selecting prospective contractors.</p>	<p>Director of Finance and Operations.</p>	■	■	■	■	■	■	■	■

Outcome 2: Our evidence base provides insight into the diversity of consumers' attitudes, needs and experiences and allows us to focus our resources on areas of greatest disadvantage and inequality.

OBJECTIVE	ACTIVITIES	SUCCESS MEASURE	OWNER	Race	Disability	Gender	Gender Reassignment	Sexual Orientation	Religion/Belief	Age	Pregnancy/Maternity
<p>A clear evidence base is established for our work, in terms of how we both choose our agenda and inform our analysis of issues.</p>	<p>Identify and promote ways of improving our evidence base by ensuring data collection and research is inclusive of people from different equality group.</p> <p>Ensure an inclusive approach to the commissioning of market analysis and research by considering consumer equality and diversity issues</p>	<p>Evidence base inclusive of people from different equality groups.</p> <p>Ability to demonstrate our compliance with the Equality Act 2010.</p>	<p>Principal Researcher Directors</p>	■	■	■	■	■	■	■	■

Outcome 3: Diversity is owned throughout the organisation and all staff know Consumer Focus’s equality and diversity duties and how they must behave as Consumer Focus representatives.

OBJECTIVE	ACTIVITIES	SUCCESS MEASURE	OWNER	Race	Disability	Gender	Gender Reassignment	Sexual Orientation	Religion/Belief	Age	Pregnancy/Maternity
All staff, management and Board are trained in equality and diversity matters	<p>The Human Resources Department will identify any training needs in this area, actively take part, and encourage staff to take up the diversity training that is available.</p> <p>All employees will undergo training in equality and diversity best practices.</p> <p>Ongoing communications from SMT and HR.</p>	<p>All staff have received training and/or guidance.</p> <p>Training is rated as successful using standard post-training questionnaires.</p> <p>Consideration of equality and diversity issues is reflected throughout our work and evident in all proposals brought forward.</p>	HR	■	■	■	■	■	■	■	■
All staff feel confident in how equality and diversity relates to policy work and how to embed and promote it through the corporate planning and project management processes	All staff involved in advocacy and policy develop are trained so that they can mainstream equality understanding into their issue identification and work planning processes.	Training is provided to all staff whose role may require them to delivery policy and advocacy projects.	Directors	■	■	■	■	■	■	■	■

Outcome 4: Our services, buildings, publications, documents and web publishing are as accessible as possible.

OBJECTIVE	ACTIVITIES	SUCCESS MEASURE	OWNER	Race	Disability	Gender	Gender Reassignment	Sexual Orientation	Religion/Belief	Age	Pregnancy/Maternity
All our publications, documents and web publications are accessible to all	<p>Mainstream equality considerations into communications processes e.g., accessibility, font sizes, alternative formats, website/communications</p> <p>Provide Welsh language publications in line with Consumer Focus’s guidelines for Welsh Language Scheme.</p> <p>Promote and ensure the appropriateness of language in all our publication and documents.</p>	<p>Accessible publications, documents and web publications.</p> <p>Requests for alternate formats are accommodated.</p>	Head of Communications		■						
The Consumer Focus website is accessible and inclusive.	Undertake an annual check of the accessibility of our corporate website.	An accessible and inclusive website.	Head of Communications		■						

<p>All internal and external events are accessible and all reasonable adjustments are made to accommodate stakeholders</p>	<p>Include a standard access statement for events in all meeting invites to external visitors</p> <p>Ask delegates at all internal and external events to evaluate accessibility. Review information after each event to ensure that we are meeting delegate needs.</p>	<p>Accessible internal and external events</p>	<p>All staff</p>		■						
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Outcome 5: We establish new ways of educating and empowering consumers to increase equality by placing power in the hands of all consumers, not just those who are already able to act in their own interests.

OBJECTIVE	ACTIVITIES	SUCCESS MEASURE	OWNER	Race	Disability	Gender	Gender Reassignment	Sexual Orientation	Religion/Belief	Age	Pregnancy/Maternity
Consumers have access to information and tools to take action for themselves	Consumer Focus Labs to identify and build specific online tools for use by consumers Develop and distribute consumer rights cards in Scotland and Wales	Minimum of 3 online tools released per fiscal year Consumer rights cards are distributed to consumers	CF Labs Consumer Focus Scotland/Wales	■	■	■	■	■	■	■	■
Advice providers are informed by Consumer Focus with information to promote consumer empowerment	Provide information and events for advice providers and frontline staff across Great Britain to promote and encourage consumer empowerment using the free information, support and advice which Consumer Focus provides	Consumers increase the usage of free information and support provided by Consumer Focus	Policy Leads	■	■	■	■	■	■	■	■

Outcome 6: Our activities are informed by discussion with, and the engagement of, relevant and diverse stakeholders

OBJECTIVE	ACTIVITIES	SUCCESS MEASURE	OWNER	Race	Disability	Gender	Gender Reassignment	Sexual Orientation	Religion/Belief	Age	Pregnancy/Maternity
The voices of the most vulnerable and marginalised consumers are given weight and consideration	Widen out the identification of issues, in particular in consultation with equality groups and their representatives	Our activities will be more robust to scrutiny and challenge.	Directors	■	■	■	■	■	■	■	■
Strong stakeholder engagement and representative participation in our work	Consult and involve stakeholders – including people from different protected groups – via a formal 90-day consultation in the development of our Annual Plan.	Our Annual Plan reflects equality considerations and identifies opportunities to promote equality	Directors	■	■	■	■	■	■	■	■

Outcome 7: All of our staff have equal opportunity in all areas of their employment and are treated fairly and with respect.

OBJECTIVE	ACTIVITIES	SUCCESS MEASURE	OWNER	Race	Disability	Gender	Gender Reassignment	Sexual Orientation	Religion/Belief	Age	Pregnancy/Maternity
Improved staff diversity declaration rates	Complete an internal publicity campaign to improve declaration rates Work to improve staff perceptions of why they should declare	Achieve a declaration rate of 80% by 2012.	HR	■	■		■	■	■	■	
Harassment, discrimination and bullying are not tolerated, and are actively eradicated	Support mechanisms will be in place for staff who report discrimination, harassment and bullying. Bullying and harassment training provided to staff and management.	More than 80% of staff express confidence (by internal survey) in management's ability to identify and tackle discrimination, harassment and bullying in all areas of employment.	HR	■	■	■	■	■	■	■	■
No significant gender pay gap (<5% considered insignificant)	Salary data is collected and reviewed to identify any significant pay gap with any necessary steps or positive action, taken to eliminate. Gender pay data is made transparent by publication	No significant gender pay gap	HR			■					

13 Alternative Formats

If you require this publication in braille, large print or on audio CD please contact us. For the deaf, hard of hearing or speech impaired, contact Consumer Focus via Text Relay:

From a textphone, call 18001 020 7799 7900

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