



HMI Prisons

Race, Disability
and Gender Equality Scheme

Foreword by Anne Owers, HM Chief Inspector of Prisons

I am pleased to introduce HMI Prisons' first Three Strand Equality Scheme setting out our objectives to work towards race, disability and gender equality within our own organisation and with those we inspect.

In our inspection programmes we inspect against a set of core criteria, *Expectations*, which have been referenced against international human rights standards. The criteria are designed to allow assessment against this Inspectorate's four tests of a healthy prison – safety, respect, purposeful activity and resettlement and four tests of a healthy immigration detention facility – safety, respect, purposeful activity and preparation for release. Within inspections we use the criteria as the basis to look at not only the overall picture but also the differential experiences of minority groups within prisons and removal centres.

Within our own organisation we have a diversity group which I chair and at which each team within the Inspectorate is represented to ensure that diversity issues are a core consideration in the work we undertake. Staff development days regularly include training in different aspects of diversity and we have recently carried out an anonymous survey of all staff to gauge their views on our approach to being a diverse organisation. Although this scheme focuses on race, gender and disability, our interest in diversity goes wider than those three areas and the revised *Expectations* for prisons we published in September 2006 included new inspection criteria for sexual orientation, religion and age as well as for race, disability and gender. Revised expectations for immigration detention facilities that include new diversity inspection criteria will be published in May 2007.

This scheme though brings together our ongoing work towards race, disability and gender equality and will be built upon on an annual basis.

Anne Owers
HM Chief Inspector of Prisons

Role of HM Inspectorate of Prisons

Her Majesty's Inspectorate of Prisons for England and Wales is an independent inspectorate which reports on conditions for and treatment of those in prison, young offender institutions and places of immigration detention.

HM Chief Inspector of Prisons is appointed by the Home Secretary, from outside the Prison Service, for a term of five years. The Chief Inspector reports directly to the Home Secretary on the treatment and conditions for prisoners in England and Wales, immigration detainees in the United Kingdom, and other matters as directed by the Home Secretary. HM Chief Inspector has the right to report direct to the Home Secretary on any matter within her remit which she thinks appropriate to draw to the Home Secretary's attention.

In determining the inspection programme, HM Chief Inspector will use her judgement and expertise in deciding what to inspect, how inspections should be carried out, what the findings should be and whether an inspection is to be announced or unannounced. HM Chief Inspector's remit includes thematic inspection of issues cutting across individual establishments.

HM Chief Inspector is not part of the policy-making function of the Home Office. But she and the inspectors have a valuable contribution to make using their knowledge and experience to support the development of good practice and sound policies.

The Inspectorate also has statutory responsibility to inspect all immigration removal centres and holding facilities and now also regularly inspects the Military Corrective Training Centre in Colchester. In addition, HM Chief Inspector of Prisons is invited to inspect prisons in Northern Ireland, the Channel Islands, the Isle of Man and some other Commonwealth countries and dependent territories.

The Inspectorate's work for the year is set out in a business plan. This is agreed between the Home Secretary and HM Chief Inspector and is published on the website. The Inspectorate works closely with the other criminal justice inspectorates, undertaking joint inspections, and also works with other inspection partners, including Ofsted, the Healthcare Commission, the Dental Practice Division of the NHS Business Services Agency and the Royal Pharmaceutical Society of Great Britain.

Developing the Scheme

HMI Prisons has 41 salaried staff, and eight fee paid staff. All staff come from a range of backgrounds. Many of the salaried staff are on secondment from HM Prison Service, primary care trusts or probation areas and each is subject to their parent organisation's terms and conditions. Others are recruited directly using Home Office procedures and are subject to mainstream civil service conditions.

Most of our work takes place in the places of detention that we inspect. We produce and publish our own inspection criteria, referenced against international human rights standards. Stakeholders within and outside the inspected service are invited to comment on them. These criteria were reissued in September 2006 following extensive consultation and included a

greater emphasis on diversity. We ask for feedback after every inspection and undertake a stakeholder survey on an annual basis.

We are responsible for our own approach to diversity. Our race equality and disability equality schemes have been published on the Inspectorate's website, and we have a diversity group chaired by HM Chief Inspector which meets quarterly. The race, disability and gender scheme which follows builds on the race and disability schemes already in place.

HMI Prisons' sole **function** is the inspection of conditions in prison and immigration detention and the treatment of prisoners and detainees. This function is relevant to the general duty in that part of our task is to determine the extent to which different groups in prisons, immigration removal centres and other places of custody experience fair and respectful treatment. However, the responsibility for these outcomes belongs to the Prison Service, the Border and Immigration Agency or other providers of custody, and HMI Prisons has no regulatory powers. Our responsibilities therefore relate indirectly to functions held by other public bodies, and our general duty is discharged by means of the equality proofing of our methodologies for inspection and review, ensuring that they are fit for the purpose of exposing poor practice and promoting good practice in the areas of race, disability and gender.

In contrast HMI Prisons' **policies and services** concern the recruitment, induction, training and management of the staff who carry out this work. Our general duty in this context is to ensure that these policies conform to equal opportunities legislation and specifically avoid discrimination and promote good relations among staff from different groups and with diverse needs.

RACE EQUALITY ACTION PLAN

Outcome	Actions	Who will be involved	Timescales
<p>Black and minority ethnic prisoners are proportionately represented in all prisoner surveys and the results of comparative analysis of 38 key questions are published in inspection reports</p>	<p>Keep survey return rates from black and minority ethnic prisoners under review to ensure sample sizes are suitable for robust statistical analysis</p> <p>Samples of prisoners asked to complete the survey are representative of the prisoner/detainee population</p> <p>A pattern of lower return rates by black and minority ethnic prisoners is responded to</p> <p>Translated surveys and access to a telephone translation service are available on all inspections</p>	<p>Research and development team, team leaders and inspectors</p>	<p>Ongoing</p>
<p>The methodology for conducting prisoner groups as part of the inspection process is free from bias</p>	<p>All staff use the agreed methodology for facilitating prisoner groups following training</p> <p>An impact assessment of the ethnicity of the group facilitator for black and minority ethnic prisoner groups is carried out and the results published in the annual review of the three strand equality scheme</p>	<p>All staff involved in facilitating prisoner groups. Impact assessment to be undertaken by diversity lead inspector</p>	<p>Ongoing. Impact assessment to be completed for review of scheme in March 2008</p>

<p>HMI Prisons' internal procedures and functions promote race equality and aims to have a representative group of staff that reflects the population we inspect</p>	<p>Conduct internal monitoring of all selection exercises to ensure that black and minority ethnic staff make up a representative proportion at all levels. Results of selection monitoring to be published annually</p> <p>Staff are informed about support networks during induction and encouraged to make contact</p> <p>Hold exit interviews with our staff when they leave the organisation to determine their views about their individual treatment.</p>	<p>Head of admin</p>	<p>Ongoing. Annual review to take place in March each year.</p>
<p>The treatment of and conditions for black and minority ethnic prisoners with mental health problems is raised for discussion and recommendations for improvement made</p>	<p>Publish a thematic review</p> <p>Incorporate any findings from the thematic review specific to black and minority ethnic prisoners into inspection methodology and update mental health expectations for use in future inspections, following consultation with internal and external stakeholders</p>	<p>Head of thematics and head of healthcare inspection, researchers and healthcare inspectors</p>	<p>Publish thematic review by September 2007. Inspection methodology and updated mental health expectations to be ready in March 2008</p>
<p>Keep the usefulness of inspection reports to internal and external stakeholders under review</p>	<p>Consult the CRE/CEHR and other stakeholders on the usefulness of our reports within an annual stakeholder survey</p>	<p>Research and development team</p>	<p>Annual survey takes place in November 2007</p>
<p>The impact of inspections on outcomes for black and minority</p>	<p>The proportion of race recommendations that are a) accepted and b) are met in subsequent inspections</p>	<p>Research and development team</p>	<p>Publication of annual report in February 2008 and review of</p>

<p>ethnic prisoners is known by the number of report recommendations that relate to race that are a) accepted and b) acted upon.</p>	<p>are routinely recorded and reported upon in the HMCIP annual report and the annual review of the three strand equality scheme</p> <p>The proportion of race recommendations that are a) accepted and b) met in subsequent inspections are compared with recommendations made in other areas and any significant difference between the two highlighted</p>		<p>three strand equality scheme in March 2008</p>
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DISABILITY ACTION PLAN

Outcome	Actions	Owner	Timescales
<p>The impact of inspections on outcomes for prisoners with disabilities is known by the number of report recommendations that relate to disability that are a) accepted and b) acted upon</p>	<p>The proportion of disability recommendations that are a) accepted and b) are met in subsequent inspections are routinely recorded and reported upon in the HMCIP annual report and the annual review of the three strand equality scheme</p> <p>The proportion of disability recommendations that are a) accepted and b) met in subsequent inspections are compared with recommendations made in other areas and any significant difference between the two highlighted</p>	<p>Research and development team</p>	<p>Publication of annual report in February 2008 and review of three strand equality scheme in March 2008</p>

<p>The treatment of and conditions for prisoners with mental health problems is raised for discussion and recommendations for improvement made</p>	<p>Publish a thematic review</p> <p>Incorporate the findings from the thematic review into inspection methodology and update mental health expectations for use in future inspections following consultation with internal and external stakeholders</p>	<p>Head of thematics and head of healthcare inspection, researchers and healthcare inspectors</p>	<p>Publish thematic review by September 2007.</p> <p>Inspection methodology and updated mental health expectations to be ready in March 2008</p>
<p>Conduct comparative analyses of key aspects of the treatment and conditions of prisoners and detainees with disabilities</p>	<p>A question about disability has been added to the anonymous prisoner and detainee questionnaires used as an integral part of inspections. This will allow comparative analysis of the self reported experiences of prisoners and detainees with disabilities to take place against the experiences of those without disabilities</p>	<p>Research and development team</p>	<p>Results to be reported in annual review of scheme in March 2008</p>
<p>Prison Service disability liaison officers are given the opportunity to consider the findings emerging from the new disability expectations</p>	<p>Arrange a forum for disability liaison officers to review and make recommendations on emerging findings from inspection of new disability expectations</p>	<p>Lead diversity inspector and Inspectorate's diversity group</p>	<p>Forum to take place by October 2007</p>
<p>Keep the usefulness of inspection reports to internal and external stakeholders under review</p>	<p>Consult the DRC and other stakeholders on the usefulness of our reports within an annual stakeholder survey</p>	<p>Research and development team</p>	<p>Annual survey to take place in November 2007</p>

<p>HMI Prisons' internal procedures and functions promote disability equality and aims to have a representative group of staff that reflects the population we inspect</p>	<p>Conduct internal monitoring of all selection exercises to ensure that staff with disabilities make up a representative proportion at all levels. Results of selection monitoring to be published annually</p> <p>Staff are informed about support networks during induction and encouraged to make contact</p> <p>Hold exit interviews with our staff when they leave the organisation to determine their views about their individual treatment</p>	<p>Head of admin and line managers</p>	<p>Ongoing. Annual review to take place in March each year</p>
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GENDER ACTION PLAN

Outcome	Actions	Owner	Timescales
<p>The impact of inspections on outcomes for women prisoners is known by the number of report recommendations that relate specifically to women that are a) accepted and b) acted upon.</p>	<p>The proportion of recommendations specific to women prisoners that are a) accepted and b) are met in subsequent inspections are routinely recorded and reported upon in the HMCIP annual report and the annual review of the three strand equality scheme</p> <p>The proportion of recommendations that are specific to women prisoners that are a) accepted and b) met in subsequent inspections are compared with recommendations made in other areas and any significant difference between the two highlighted</p>	<p>Research and development team</p>	<p>Publication of annual report in February 2008 and review of three strand equality scheme in March 2008</p>

<p>The Inspectorate has a specialist team that inspects all women's establishments, liaises with the relevant bodies in the Prison Service and National Offender Management Service, and keeps under review all policies and practices relating to women</p>	<p>Prisons holding women are expected to have in place policies that are gender specific where relevant – for example in relation to self-harm, drugs, bullying, security and resettlement.</p> <p>The National Offender Management Service is encouraged to have in place a senior champion for women's issues, to drive forward gender-specific policies and procedures</p> <p>Each annual report contains a section on women, outlining progress made and required</p>	<p>O inspection team</p>	<p>Throughout the year</p> <p>Annual report in February 2008</p>
<p>The treatment of and conditions for women prisoners with mental health needs are raised for discussion and recommendations for improvement made</p>	<p>Publish a thematic review of mental health needs of prisoners, drawing out any differential experience of women prisoners by September 2007</p> <p>Incorporate any findings specific to women prisoners into expectations for use in future inspections following consultation with internal and external stakeholders</p>	<p>Head of thematics and head of healthcare inspection, researchers and healthcare inspectors</p>	<p>Publish thematic review by September 2007</p> <p>Inspection methodology and updated mental health expectations to be ready in March 2008</p>
<p>The inspectorate informs itself of differential experiences of transsexuals in prisons takes the necessary steps to report on this in inspection reports</p>	<p>Review the reported experiences of prisoners who identify themselves as transsexual in the prisoner survey and establish any themes emerging</p> <p>Consider the need to incorporate any emerging</p>	<p>Research and development team and Inspectorate's diversity group</p>	<p>Review responses to the survey over a 12 month period and consider results in March 2008</p>

	themes into expectations, liaising with internal and external stakeholders		
HMI Prisons' internal procedures and functions promote gender equality and aims to have a representative group of staff that reflects the population we inspect	<p>Conduct internal monitoring of all selection exercises to ensure that the gender balance of staff make up a representative proportion at all levels. Results of selection monitoring to be published annually</p> <p>Staff are informed about support networks during induction and encouraged to make contact</p> <p>Hold exit interviews with our staff when they leave the organisation to determine their views about their individual treatment</p>	Head of admin and line managers	Ongoing. Annual review to take place in March each year
Keep the usefulness of inspection reports to internal and external stakeholders under review	Consult the EOC/CEHR and other stakeholders on the usefulness of our reports within an annual stakeholder survey	Research and development team	Annual survey to take place in November 2007

The Legislation

The Race Relations (Amendment) Act 2000

Introduction

The Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2000 – referred to as the Act throughout this annex – places a general duty on public authorities to promote race equality. Under the new duty, and through all relevant functions, public authorities are required 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 Home Office is subject to the Act and published a revised Race Equality Scheme in May 2005.

Context

The Race Relations Act 1976 provides the legislative base for anti-racist policies within Britain. The 1976 Act was significantly strengthened as a result of recommendations that came out of the Macpherson Report on the Stephen Lawrence murder inquiry. The Race Relations (Amendment) Act 2000 amended the 1976 Act so as to:

- a. Prohibit race discrimination in public functions not previously covered by the 1976 Act.
- b. Place a general duty on specified public authorities to have due regard to the need to promote race equality.
- c. Give the Home Secretary powers to impose specific duties on public authorities that are subject to the general duty, and to add to the list of bodies to which the general duty applies.

A 'racial group' in the 2000 Act is a group of people defined by colour, ethnicity, race, nationality, national or ethnic origins. The new anti-discrimination provisions and the general duty for public authorities listed in the 2000 Act came into effect on 2 April 2001.

Schedule 1A to the 1976 Act, as amended, lists the bodies and other persons subject to the general duty.

There have also been several advances in race equality law through the European Community, including:

- Article 13 of the Treaty of Amsterdam which conferred upon member states the ability to 'take action to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation'
- Council Directive 2000/43/EC, which implements the principle of equal treatment between people irrespective of racial or ethnic origin. It was adopted by EU member states in 2000

- Race Relations Act 1976 (Amendment) Regulations 2003 which redefined indirect discrimination, introduced a new definition of harassment (applicable to both employers and employees), redefined the burden of proof and its application to institutional liability, and removed those exceptions that are contrary to the principle of equal treatment for all.

Specific duties

The specific requirements in relation to our Race Equality Scheme are as follows:

- a. The preparation and publication of a scheme which sets out how we intend to meet its obligations under the general duty and other specific duties which have been set and are relevant to it.
- b. An assessment of our functions and policies which we feel are relevant to the general duty (which must be reviewed at least every three years).
- c. Our arrangements for assessing and consulting on the impact that any policies it is proposing are likely to have on the promotion of race equality.
- d. Our arrangements for monitoring its policies for any adverse impact on the promotion of race equality.
- e. Our arrangements for publishing the results of our:
 - i. Assessment under (b).
 - ii. Consultations under (c).
 - iii. Monitoring under (d).
- f. Our arrangements for ensuring that those from minority ethnic communities have access to information and to services that it provides.
- g. Our arrangements for the training of its staff on issues relevant to the general duty and the specific duties.

Employment duties

There are also the following specific duties relating to employment issues.

Certain public authorities subject to the general duty are required to have in place arrangements for monitoring the ethnicity of:

- i. Staff in post.
 - ii. Applicants for jobs, promotion and training.
- b. If such a body has more than 150 full-time employees it is required to have in place arrangements for monitoring the ethnicity of staff who:
 - i. Receive training.
 - ii. Benefit or suffer detriment as a result of performance appraisal.
 - iii. Are involved in grievance procedures.
 - iv. Are the subject of disciplinary procedures.

- v. Are dismissed or leave for other reasons.
- c. As a public authority subject to these employment duties we must publish annually the results of the above ethnicity monitoring.

The Disability Discrimination Act 2005

The Disability Discrimination Act 2005 (DDA) places a general duty on public authorities to promote disability equality. The Home Office is subject to the DDA and produced a Disability Equality Scheme which was published on 4 December 2006.

Legislative context

The Disability Discrimination Act (DDA) 1995 has been amended by the Disability Discrimination Act 2005 so that it now places a duty on all public bodies to promote disability equality. We recognise that the DDA 1995 was an important step towards achieving equality for disabled people, but disability equality has not had the same statutory emphasis or history as sex or race discrimination (the Sex Discrimination Act and Race Relations Act are both over 30 years old). The Government commissioned a Disability Rights Task Force which reported in 1999 ('Towards Inclusion: Civil Rights for Disabled People') and recommended a number of amendments to the DDA 1995. This resulted in the DDA Amendment Regulations (2003), which came into force on 1 October 2004.

This new positive duty marks another important stage as it requires public bodies to be proactive in promoting equality for disabled people, rather than simply to make reasonable adjustments for their staff and service users in order not to discriminate. The duty requires a root and branch overhaul of policy-making procedures within public authorities as well as demanding much greater openness.

Duties under the Disability Discrimination Act 2005 (DDA)

General duty

The Disability Discrimination Act 2005 places a **general** duty on all public sector authorities, including Government departments and agencies, to promote equality for disabled people. It represents a significant change in the way public authorities organise their services to improve the lives of disabled people. All public authorities must, in carrying out their functions, 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: and
- take steps to take account the disabled persons' disabilities, even where that involves treating disabled people more favourably than other people.

The general duty to promote disability equality places positive responsibilities on authorities to work proactively towards a more equal society by mainstreaming disability equality into the ways in which they carry out their functions. It builds on the duties already implemented under the DDA, including the duty to make 'reasonable adjustments' to ensure that disabled people can access employment and occupation, education, goods, facilities, services, functions and premises.

The general duty requires public authorities to give due weight to the need to promote disability equality in relation to policy and practice including inspection, planning, policy making, service delivery, regulation, enforcement and employment.

'Due regard' means that authorities should always consider the need to promote disability equality in proportion to its relevance. It requires more than simply giving consideration to disability equality. It will not always be possible for authorities to adopt the course of action which will best promote disability equality but public authorities must ensure that they have due regard to the requirement to promote disability equality alongside other competing requirements.

Areas exempt from general duty

The DDA excludes the following certain actions of public authorities from being subject to the general duty:

- a judicial act (whether done by a court, tribunal or other person);
- any act done on the instructions or on behalf of a person acting in a judicial capacity;
- any act of, relating to, or making or approving of an Act of Parliament, an or an Order in council; and
- where a public authority is exercising a statutory power and has no discretion as to whether or how to exercise that power, or no discretion as to how to perform its duty.

Specific duties

The DDA 2005 places **specific** duties on the Home Office as a public authority. They are set out in the Disability Discrimination (Public Authorities) (Statutory Duties) Regulations 2005. The Regulations are intended to assist public authorities in meeting the general duty. In particular, they set out what public authorities should do to plan, deliver and evaluate action to eliminate discrimination, promote equality, and report on the activity which they undertake.

The specific disability equality duties require the Home Office to:

- a) publish and implement a Disability Equality Scheme, setting out how it intends to fulfil its general and specific duties;
- b) involve disabled people in producing the scheme and developing an action plan;
- c) set out how the Home Office will assess the impact of existing and proposed activities on disabled people;
- d) produce an action plan for implementing the duty to promote disability equality for the next three years;
- e) set out how the Home Office will gather evidence on progress towards disability equality, including in relation to the:
 - recruitment, retention and development of disabled staff, and
 - extent to which the Home Office services and functions meet the needs of disabled people;
- f) set out how the Home Office will use the information it collects, to review the effectiveness of the action plan, and to produce future Disability Equality Schemes; and
- g) report on progress every year and review and make appropriate revisions to this scheme at least every three years.

We are also required to:

- within three years of the Scheme being published, take the steps set out in the action plan (unless it is unreasonable or impractical to do so) and put into effect the arrangements for gathering and making use of information;
- make information and services accessible to the public
- train our staff in the disability equality duties; and
- monitor the way the Home Office works as an employer to identify how our employment practices affect staff in the Home Office, including disabled staff.

The Gender Equality Duty

The Gender Equality Duty (GED) came into force in April 2007. It requires public authorities to promote equality between women and men and eliminate unlawful sex discrimination and harassment. This means the public sector has to develop policies, design services and have employment practices with the different needs of women and men in mind. The duty covers all the functions of a public authority, such as policy-making, public services, and employment.

Instead of relying on individuals to make complaints about sex discrimination, the duty places the legal responsibility on public authorities to demonstrate that they treat men and women fairly. Thirty years after the introduction of the Sex Discrimination Act (SDA), there is still widespread discrimination. The rights of individuals do not oblige organisations to promote equality. The GED will bring about real change in the culture of public organisations and the onus will be on organisations to promote equality, rather than just on individuals to take cases. It does not replace the right of individuals to take cases against a public authority.

The Equality Act 2006

The Equality Act 2006 includes within it a new positive duty on public bodies to promote gender equality. Under the new duty, and through all relevant functions, public authorities are required to have due regard to the need to:

- eliminate discrimination and harassment that is unlawful under the Sex Discrimination Act and discrimination that is unlawful under the Equal Pay Act
- promote equality of opportunity between men and women.

Legislative context

The Equality Act 2006 amends the Sex Discrimination Act 1975 to place a statutory duty on all public authorities, when carrying out their functions, to have due regard to the need:

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

Women and men, including transsexual people, may experience different forms of disadvantage depending on their age, ethnicity, colour, religion/belief, sexual orientation,

marital or civil partnership status, and disability status. In order to understand and address questions of gender equality, we may need to consider such complexity and whether particular groups of women or men are experiencing particular disadvantages.

This new duty marks another step forward, as it requires us to be proactive in promoting equality for women, men and transsexual people, rather than simply to make adjustments for our staff and service users in order not to discriminate. The duty requires a root and branch overhaul of our policy-making procedures, as well as demanding much greater openness.

Unlawful discrimination in the Sex Discrimination Act and Equality Act means:

- a. Direct or indirect discrimination against women and men, in employment and education; in goods, facilities and services and in the exercise of public functions.
- b. Harassment, sexual harassment and discrimination on the grounds of pregnancy and maternity leave.
- c. Discrimination on the grounds of gender reassignment in employment and vocational training.
- d. Direct and indirect discrimination in the employment field on the grounds that a person is married or has a civil partner.
- e. Victimisation on the basis of gender.

1. In employment and vocational training, the Sex Discrimination Act also protects individuals who are discriminated against because they:

- intend to undergo gender reassignment
- are currently undergoing gender reassignment
- have already undergone gender reassignment.

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

Specific duties

The specific requirements in relation to our Gender Equality Scheme are as follows:

- a. Publish a Gender Equality Scheme, by 6 April 2007, identifying gender equality goals and showing the actions we will take to implement them.
- b. Consult our employees and stakeholders as appropriate in drawing up our gender equality scheme.
- c. Monitor progress and publish annual reports on progress.
- d. Review the scheme at least every three years.
- e. Develop and publish a policy on developing equal pay arrangements between women and men – including measures to promote equal pay and ensure fair promotion and development opportunities to tackle occupational segregation – which we will review at regular intervals (for example every three years).

- f. Conduct and publish gender impact assessments, consulting appropriate stakeholders, covering all major proposed developments in employment, policy and services.
- g. Develop and publish an arrangement for identifying developments that justify conducting a formal gender impact assessment.