

Food Standards Agency

Equality and Diversity Objectives: April 2012

Contents:

Introduction
Background
FSA Diversity Policy Statement
Public Sector Equality Duty
Equality and Diversity Objectives
Monitoring and Measuring Progress
Continued Actions

Appendix 1:
FSA Equality and Diversity Objectives and Supporting Actions

1. Introduction

1.1 The Food Standards Agency (FSA) is committed to creating and maintaining an inclusive environment. Promoting equal opportunity and valuing diversity help to make the FSA more effective in understanding its varied and diverse consumer base, and ultimately in achieving its strategic objective of safer food for the nation.

1.2 This report supplements the FSA Diversity Report published in January 2012 (see http://www.food.gov.uk/aboutus/how_we_work/equality) and

- summarises the FSA's strategic direction in respect of equality and diversity;
- provides information about how the FSA has met and will seek to continue to meet the equality duties at a strategic level;
- sets out the FSA's equality priorities and measurable objectives from 2012; and
- sets out arrangements for monitoring, measuring and reporting progress.

2. Background

2.1 The FSA is a non-ministerial government department set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food.

2.2 The FSA is the central competent authority responsible for food safety and food and feed hygiene across the United Kingdom. It works with other enforcement bodies to enforce food safety rules and has staff who work in GB meat plants to check that the requirements of the regulations are being met. In Northern Ireland the Department of Agriculture and Rural Development carries-out meat inspection controls on behalf of the Agency. The FSA also commissions research and carries-out surveillance related to food safety. In Scotland and Northern Ireland, the FSA has responsibility for nutrition and in Northern Ireland, Scotland and Wales, has responsibility for food labelling including allergen labelling.

2.3 The six outcomes the FSA aims to deliver are:

- ✓ foods produced or sold in the UK are safe to eat;
- ✓ imported food is safe to eat;
- ✓ food producers and caterers give priority to consumer interests in relation to food;
- ✓ consumers have the information and understanding they need to make informed choices about where and what they eat;
- ✓ regulation is effective, risk-based and proportionate, is clear about the responsibilities of food business operators, and protects consumers and their interests from fraud and other risks;

- ✓ enforcement is effective, consistent, risk-based and proportionate and is focused on improving public health.

2.4 These outcomes are supported by the FSA's core principles of:

- putting the consumer first;
- openness and transparency;
- science and evidence-based;
- acting independently;
- enforcing food law fairly.

3. FSA Diversity Policy Statement

3.1 The FSA's Diversity Policy Statement, published in May 2010, sets out the FSA's commitment to providing equality of opportunity and eliminating all forms of discrimination, harassment and bullying. The FSA is committed to promoting a good and harmonious working environment in which everyone is treated with respect and will not tolerate discrimination, bullying and harassment of any kind. The FSA will take any complaint seriously. Individuals will not be penalised for raising a complaint in good faith, even if the complaint is not upheld.

3.2 All FSA employees and individuals working under contract arrangements are required to assist the FSA to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination, harassment and bullying.

4. Public Sector Equality Duty

4.1 The public sector equality duty was created by the Equality Act and replaces the former race, disability and gender equality duties. The duty came into force on 5 April 2011 and covers age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation (known as protected characteristics).

4.2 The general duty requires that the FSA has due regard to:

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

4.3 The general public sector equality duty seeks to mainstream and integrate consideration of equality and good relations into day to day business. It requires equality considerations to be reflected in the design of policies and the delivery of services, including internal policies, and for these to be kept

under review. Whilst compliance with the duty is a legal obligation, it equally makes good business sense – for example, in terms of the development of a supportive working environment and the provision of services to meet the diverse needs of users.

4.4 The specific public sector duties are aimed at assisting public authorities in the better performance of the general public sector duty. In January 2012, as required by the specific duties, the FSA published its Diversity Report (available on the FSA website - see paragraph 1.2 above) which includes information regarding the FSA's workforce profile, in addition to its work and commitment to promoting diversity in a number of key areas, including learning and development, recruitment and engagement with external stakeholders. This information will be updated and published annually.

5. Equality and Diversity Objectives

5.1 The specific duties also require public bodies to prepare and publish at least one specific and measurable equality objective to help the organisation better perform the general equality duty, focusing on immediate priorities and outcomes to be achieved. The FSA objectives and supporting actions are set out at Appendix 1. These objectives and subsequent outcomes will help the FSA secure improvements in service delivery and the employment of its staff. In addition to these specific objectives, the FSA will continue to promote and extend diversity in a number of other ways some of which are summarised in section 7 below.

Consultation and engagement

5.2 The development of the FSA's equality objectives has been informed by the evidence gathered and analysis undertaken to produce the FSA's Diversity Report and through consultation across the organisation. The equality objectives have been shaped by views and comments from FSA staff, via

- FSA Staff Group;
- Continuous Improvement Group;
- Anti-Bullying and Harassment work programme;
- FSA's recognised Trade Unions; and
- Executive Management Board.

Reductions in reports of workplace bullying and harassment

5.3 In 2011 the FSA commissioned an independent survey and follow-up research aimed at better understanding the scale and the experience of staff in meat operations in respect of harassment and bullying. Bullying and harassment is not something which any individual should have to experience and it is also not something that any individual should stand by and watch. Whilst staff recognise that the FSA is addressing the issue, there is more that can be

done. The FSA's equality and diversity objectives reflect this ongoing commitment and build upon previous work in this area, which has included:

- the placement of at least one anti-bullying poster in each FSA office in each plant. The posters convey a strong message and give details of how to obtain further information if staff feel threatened at work; and
- a Code of Conduct which has been widely distributed and applies to all staff working in the operational environment, and includes FSA staff, contract staff as well as Food Business Operators and their own staff;
- *Guidance on dealing with situations of conflict* distributed to all meat operations staff; and
- the publication of case studies including support for lone workers, FSA success in the courts and in tackling obstruction.

(Note: all of the above are available to all FSA staff on the FSA's intranet).

Findings from the 2011 People Survey reported a slight decrease in staff reporting personal experience of harassment or bullying at work from 22% in 2010 to 19% in 2011. The FSA is aiming to see this trend continue with a year on year reduction in this area.

Comprehensive workforce data

5.4 Following the workforce analysis undertaken to produce the FSA's Diversity Report in January 2012, the FSA committed to completing a more detailed analysis of its workforce profile, including an analysis by grade in respect of age and declarations of disability, ethnicity, sexual orientation and religion and belief. This analysis will help the FSA identify any under-representation within the workforce, and will subsequently assist the FSA in determining areas where positive action might usefully be explored to support an increase in representation. This is an area of work that has been prioritised following consultation with the Trade Unions and staff. This work will be supported in the longer term by the implementation of a communications strategy encouraging all staff to review and, where necessary, update existing personal data. Current declaration rates, together with future targets are shown in the table below:

	Declaration rates: April 2012	Declaration rates; Target April 2015
Ethnicity	94%	98%
Disability	95%	98%
Religion or belief	23%	50%
Sexual orientation	23%	50%

The above are just two of the proposed actions that will help the FSA in establishing comprehensive workforce data and subsequently identifying barriers to equality and measuring progress towards an inclusive working environment.

Procurement

5.5 The FSA is keen to ensure that those suppliers who contract with the FSA demonstrate that reasonable and practicable steps are taken to facilitate equal access and treatment in employment and service delivery. To support this, the Procurement Team will ensure that all potential suppliers are aware of the provisions within the FSA's Diversity Policy Statement and that diversity requirements feature in the tendering stage of the procurement process through to the conditions of contract.

Behaviour and culture change

5.6 To further support a culture which embraces and fosters good relations promoting an environment where equality and diversity are embedded within the day to day activities of all staff, the FSA is proposing a number of ongoing actions aimed at raising awareness. These include: the production and roll-out of training material focusing on equality analysis and diversity considerations in recruitment and selection; and use of the FSA's intranet to raise the profile of equality and diversity. A further action supporting this objective and one which has also been informed by discussions with the Trade Unions is the commitment to review the results of the 2011/12 performance review round. The FSA introduced a new Performance Review Scheme in April 2011 in which assessments are based upon evidence of performance, demonstration of competencies and achievement of objectives. Training has been delivered to all team leaders with the aim of securing quality and consistency of scoring and the prevention of bias and discrimination.

5.7 Progress towards this objective will be reflected in the results of the annual People Survey. The third People Survey was completed in 2011 and results showed a small improvement compared with previous years. It was encouraging that more FSA staff completed the survey in 2011 – the response rate was up to 82%. Similarly, the FSA's engagement index also showed an increase of 3 percentage points to 51%. (This is only 4 percentage points below the Civil Service benchmark). Taking into account the survey results in 2010, the findings showed small improvements in positive scores across most of the themes and the FSA aims for this trend to continue in future years. The findings from the Survey will be taken into account in progressing the FSA's Organisational Improvement Programme (OIP). The OIP is an important tool in the delivery of the improvements required in the FSA that will ensure the delivery of strategic priorities and improve working lives. In the longer term and with the support of the outcomes delivered by the OIP, by April 2015, the FSA would expect to see its employee engagement index equal or exceed the Civil Service Benchmark.

6. Monitoring and Measuring Progress

6.1 Progress in implementing and achieving the FSA's equality objectives will be monitored and reported. Update reports will be provided to the Executive Management Board and Trade Unions and published on Foodweb, the FSA's

internal intranet, to ensure that they are accessible to all staff.

6.2 In measuring progress, the FSA will benchmark against the wider Civil Service; progress towards Cabinet Office targets in respect of women, disability and ethnicity in the Senior Civil Service; and the findings from the People Survey. It will also use the information gathered during the completion of equality analysis undertaken in respect of HR and other FSA policies / practices.

6.3 Progress will be reported within the FSA's Diversity Report which will be published annually.

7. Continued Actions

7.1 In addition to the specific and measurable objectives outlined above and set out in more detail at Appendix 1, the FSA will continue to embed a number of additional diversity initiatives, including:

- the Flexible Working Patterns Policy, launched in February 2012, extended the opportunity to request a flexible working pattern to all staff. The FSA offers a range of flexible working options allowing staff to meet their work-life balance requirements. However, due to the operational delivery requirements and pressures faced by some roles across the FSA, it is recognised that flexible working options are not always practical for all staff;
- the establishment and promotion of a Childcare Voucher Salary Sacrifice Scheme;
- continued progression of the FSA's harmonisation programme to embed a single approach to HR management, introduce a single set of new HR policies and procedures; and to more closely align the terms and conditions of employment. A key objective of the FSA harmonisation programme is to ensure that staff are treated in a fair, equitable, and consistent manner. Over the past 12 months the FSA has addressed some of the differences through the introduction of new HR policies, including Diversity Policy Statement and more recently the Flexible Working Patterns Policy. An Equality Impact Analysis is conducted on each new and revised HR policy. This harmonisation project is working within a timeline that runs from 2011 to 2015 and changes will need to be made through a process of engagement with staff and the recognised trade unions. For example, the Policy Advisory Group comprising of representatives from across the FSA will help to shape future HR policies, guided by template policies provided by Civil Service Employee Policy (CSEP);
- the continued development of learning and development programmes to support diversity, both in terms of content and in ensuring equal and fair access to learning opportunities;
- taking an active part in the re-refresh of the Professional Skills for Government Competency Framework for the Civil Service. The framework

encompasses a wide range of values and behaviours, and supports principles of fairness of opportunity;

- the ongoing development and expansion of the FSA's dedicated Diversity pages on its intranet which seeks to support openness and transparency in respect of the FSA's approach to diversity and workforce data. The Diversity pages will continue to be populated with diversity data and guidance for staff and managers;
- the completion and publication of equality analysis reports, particularly in respect of the ongoing policy development and the HR harmonisation programme.

The FSA undertakes Impact Assessments (IA), or in Scotland the Business and Regulatory Impact Assessments (BRIAs), for every policy proposal (legislative and non-legislative). IAs and BRIAs consider all possible benefits and risks of those proposals whilst also taking on board social issues such as health and equality, sustainability aspects, costs to specific sectors as well as enforcement and implementation issues. IAs and BRIAs are used across Government Departments as a standardised policy-making tool and require policy makers to consider any impacts on protected groups under the Equality Act. The FSA has recently updated its guidance on completing impact assessments to incorporate a checklist including completing equality impact assessments. In addition, the FSA is planning to update its guidance regarding consultation and this will outline methods of engagement to ensure that minority groups are fully involved where appropriate. Equality Impact Assessments relating to external facing FSA policies are published on the FSA's website linked from Impact Assessments at: www.food.gov.uk.

- maintenance of the Two Ticks positive about disabled people scheme; and
- continued commitment to undertaking equal pay audits and to investigate any disparities.

7.2 In addition to the initiatives outlined above focusing on the development of and inclusiveness within the workforce, the FSA will continue to engage (either directly or through associated organisations) with consumers from minority groups and / or who are more vulnerable and disadvantaged to ensure their views and concerns are heard and taken into account. In planning how, when and with whom engagement takes place, the needs of consumers with protected characteristics will be considered in parallel with the policy that is being developed. This is to ensure that where policy development or regulatory changes are taking place any disproportionate or adverse effect on consumers with protected characteristics are examined as part of the consumer engagement development phase and tailored engagement with those consumers or representatives is conducted. For example, previously the FSA has engaged directly with Muslim and African Caribbean populations when researching risks associated with consuming sheep and goat products. Currently, the FSA is working alongside community representatives to determine the most effective way of communicating messages regarding the

potential carcinogenic effects of consuming the Betel (Areca) nut which is traditionally consumed by members of the South East Asian community. Additionally, the FSA is currently planning to engage with consumers using its Citizens Forum mechanism to explore consumer views on two specific areas, firstly the expansion of the Food Hygiene Rating Scheme (FHRS) and secondly in respect of the review of Official Controls Delivery in the UK. The Citizens' Forums currently provide an effective method for the FSA to capture consumer views, opinions and develop insight especially around complex food safety issues where there is likely to be limited base knowledge or, indeed, where consumers have no awareness of the topic at all. The FSA is keen that in this work any potentially vulnerable or disadvantaged consumers are identified so that the FSA may tailor make a consumer engagement approach for these key work areas.

7.3 For a number of years the FSA in Scotland has carried out work with 'seldom heard' groups and their representatives. The purpose of their consumer engagement events is to listen and engage with individual consumers to gain an insight into their views, attitudes and different needs and in doing so, as recommended by the Advisory Committee on Consumer Engagement, the FSA in Scotland has formed partnerships with organisations connected to different sections of the community. The cases studies below provide further information regarding the work that has been undertaken both in Scotland and the wider FSA.

Case Study: Engaging with the deaf community

There are around 9,000,000 deaf or hard of hearing individuals in the UK, 688,000 of whom are severely to profoundly deaf. Around 55,000 people use British Sign Language (BSL) as their first or preferred language. BSL was recognised as a language in its own right in March 2003.

In 2010 the FSA in Scotland focused efforts on engaging with members of the deaf community in Scotland. This group was chosen following discussion with representatives of Deaf Connections – a Glasgow based organisation which provides support services to the deaf community in the West of Scotland. The discussion highlighted issues not previously considered, such as the difficulties presented in reading written English to an individual whose first language is BSL.

The FSA's objectives in this work were:

- to listen to and engage meaningfully with deaf people in order to gain an insight into their attitudes, opinions and feelings;
- to build effective relationships with organisations already in contact with deaf people;
- to allow their views, attitudes and specific needs to be taken into account and to help shape future communication strategies/campaigns;
- though recognising the limitations of this, to increase awareness of and improve penetration of the FSA and its key messages.

The FSA in Scotland gathered groups of 9 - 15 people in 3 separate locations across Scotland, so the groups were small enough to allow everyone the opportunity to express their views but large enough to provide diversity of opinions. The services of BSL signers and note-takers were used to facilitate the events. The groups were very enthusiastic and delighted that their views were seen as important.

Discussions highlighted some confusion over “use by” and “best before” dates, which had been noted in discussions with other groups, and a desire for some food safety advice being presented in a format more accessible to the deaf community. Leaflets and information on websites were not seen as the best way to engage with or to get information across to the deaf community, instead suggestions for webclips and / or DVDs with BSL were given.

Following these events the FSA in Scotland continued to engage with Deaf Connections, particularly in the lead up to Food Safety Week 2011, and through FSA funding for Food Safety Week partners they were able to help the FSA in Scotland get their food hygiene messages out to people in the deaf community by producing an accessible BSL version of Food Safety Week’s ‘Kitchen Confidential’ DVD. They showed this at a number of health information and healthy eating events as well as quiz nights for deaf people in the Glasgow Deaf Centre. The BSL version has also been uploaded onto their website for wider circulation.

Deaf Connections were also in the process of refurbishing their community kitchen to deliver cookery, healthy eating and food hygiene courses for people in the deaf community and through FSA in Scotland funding they were able to complete this refurbishment, in addition to staff and volunteers undertaking food hygiene training in advance of the community café opening. A hand hygiene training kit was also purchased which will be used for food preparation demonstration events and healthy eating cookery classes. Fridge thermometers will also be distributed by Deaf Connections home care service to service users who will be given advice on their use. This will give staff an opportunity to advise on The 4C’s of Food Hygiene.

Case Study: Hygiene, Healthy Eating and Activity Projects in Schools (HHEAPS) Pilot for Special Educational Needs (SEN) Schools

The Hygiene, Healthy Eating and Activity in Primary Schools (HHEAPS) initiative has developed over 5 years from 2 pilot projects with Aberdeen Football club into a highly respected and successful resource delivering food hygiene, healthy eating and activity messages to P4-6 pupils.

The concept of using role models such as sports coaches proved to be a powerful one and following the pilots key partnerships were established with Scottish Rugby, Scottish Football Association, Tennis Scotland and the Active Schools network. By March 2011 just under 54,000 pupils in more than 900 schools all across Scotland had taken part in the HHEAPS programme.

The FSA’s objectives for this work are to:

- continue use of positive role models to link with classroom activities & promote children’s awareness of food hygiene, healthy eating and fitness;
- continued alignment with both FSA and Scottish Government strategic outcomes and priorities;
- build on established partnerships and develop the HHEAPS resource to extend its reach across Scotland;
- improve the knowledge of food hygiene and nutrition in approximately 15,000 children each year throughout Scotland;
- develop and pilot a Special Educational Needs (SEN) version of HHEAPS during 2011-12.

HHEAPS is designed to be delivered over a continuous 6 week period with each classroom

activity lasting approximately 1 hour. There are 6 activity sessions to complete (3 food hygiene and 3 healthy eating), to maintain linkage, the first coaching session should immediately follow completion of classroom Activity 1 (& so on).

It was clear that there was also a demand for a SEN version which was highlighted in teacher's feedback forms in addition to feedback from Teacher's Panels (one of the FSA in Scotland's other school related projects which allows engagement with teachers face to face to evaluate resources and initiatives).

A SEN version of the *Mission Book* has now been created following feedback on 2 previous versions from SEN teachers. The book is now in A3 format as opposed to A4, with more pictures and limited text and is accompanied by more hands on practical activities. To help develop suitable materials and activities representatives from the FSA in Scotland visited an Autism Unit in Glasgow to meet some of the children and have a look at some of the teaching materials and resources they currently use.

One of the FSA in Scotland's current partners Tennis Scotland will be working with the FSA on the SEN pilot through their Disability Tennis Development Manager. Tennis Scotland had already sent out 36 Special Equipment Packs to schools in Scotland and working with Glasgow's Active Schools co-ordinator they have identified 8 SEN Schools to take part in the 6 week pilot programme. The pilot was due to start mid February but due to school timetables this has been rearranged for April 2012. All the resources have been sent out to Tennis Scotland and they will disseminate to schools taking part and deliver the coaching sessions during the pilot.

Feedback from all schools and teacher's involved will be gathered and used to make any further amendments to the *Mission Book*, teacher's guide and coaches cards. Feedback on the resources accompanying the *Mission Book* will also be gathered and it is hoped that a final version can then be agreed and rolled out to SEN schools across Scotland in 2012-2013.

Case Study: Working effectively with minority ethnic food businesses

"Working effectively with minority ethnic food businesses" is a bespoke, one day training course for Local Authority food law enforcement officers which was developed by the FSA in 2008. The aim of the course is to help these officers develop a better understanding, awareness and confidence in working with diverse community groups with different religious, cultural and dietary practices and forging effective business relationships to ensure compliance.

The training course is held on an annual basis, and in addition is complemented by a handbook, available on the FSA's website, which is designed to be a practical day-to-day resource for Local Authority food law enforcement officers. (This handbook is currently under review and is being updated to reflect feedback received in respect of additional guidance requests).

7.4 Together with the specific objectives and actions set out in Appendix 1 the actions and initiatives outlined above will help the FSA to create and maintain an inclusive environment and enhance understanding of its varied and diverse consumer base.

Appendix 1:

FSA Equality and Diversity Objectives and Supporting Actions

The general duty requires that the FSA has due regard to:

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

The Objectives and supporting actions set out below seek to assist the FSA in meeting and demonstrating these requirements.

Progress will be monitored and reported. The FSA will continue to consult and engage on the ongoing relevance of these objectives and actions and the inclusion of additional priorities.

Objective 1: The reduction of staff reporting incidents of harassment and bullying at work, supporting a culture where staff can develop to their full potential and differences are embraced.

Outcome: A year on year reduction of staff reporting, via the People Survey, personal experience of harassment and bullying at work.

<i>Actions</i>	<i>Date</i>	<i>Lead Responsibility</i>
Launch of Anti-Bullying and Harassment Adviser Network as a support option for staff.	April 2012	Chair of the Anti-Bullying and Harassment Working Group
Provision of clear leadership on tackling harassment and bullying issues within teams to be provided to team leaders within the new Operational management structure.	From April 2012	Chair of the Anti-Bullying and Harassment Working Group
The production of a special edition of <i>The Inspector</i> focusing on bullying and harassment.	May 2012	Chair of the Anti-Bullying and Harassment Working Group
Development and launch of a dedicated compulsory e-learning module.	September 2012	Chair of the Anti-Bullying and Harassment Working Group
Extend the external independent research commissioned in 2011 to assess cultural acceptance and root causes of harassment and bullying.	December 2012	Chair of the Anti-Bullying and Harassment Working Group
Further external independent questionnaire issued to staff in Operations to measure progress against the 2011 results.	Summer 2013	Chair of the Anti-Bullying and Harassment Working Group

Objective 2: To improve declaration rates with the aim of establishing more comprehensive workforce data to assist in identifying and addressing barriers to equality and measuring progress towards an inclusive working environment.

Outcome: By April 2015, declaration rates to have increased to: 98% in respect of ethnicity and disability; and 50% in respect of religion or belief and sexual orientation

<i>Actions</i>	<i>Date</i>	<i>Lead responsibility</i>
(i) Expand the workforce analysis undertaken within the FSA Diversity Report (January 2012) to analyse in more detail the FSA workforce profile by grade and key protected characteristics (ii) with the aim of identifying under-represented minority groups and exploring areas for potential positive action initiatives.	(i) September 2012 (ii) Summer 2013	HR Employee Relations and Policy Manager
Review the collection and recording of diversity and equality information to improve equality and diversity monitoring.	September 2012	HR Systems and Reward Manager
In line with the specific duties of the public sector equality duty, to produce and publish the FSA's Diversity Report providing information relating to those who share a relevant protected characteristic who are FSA employees and others affected by its policies and practices.	January 2013 and annually thereafter	HR Employee Relations and Policy Manager
Review the collection of diversity information in both external and internal recruitment exercises to ensure that appointments to the FSA continue to be made on merit following fair and open competition and are non-discriminatory.	April 2013	HR Resourcing Team Manager
Develop and implement a communications strategy encouraging all staff to review and, where necessary, update existing employee data on disability, ethnicity religion or belief and sexual	April 2015	HR Employee Relations and Policy Team

orientation with a view to achieving a 98% declaration rate in respect of ethnicity and disability; and 50% in respect of religion or belief and sexual orientation.		
--	--	--

Objective 3: The FSA is committed to pursuing a comprehensive policy of equal opportunities in procurement in its dealings with other stakeholders, internal and external customers, as well as members of the public. So far as is reasonably practicable and within the law, no-one shall receive less favourable treatment on the grounds of sex, marital status, sexual orientation, age, family circumstances, disability, colour, race, nationality or ethnic or national origins, religious or political beliefs, or be disadvantaged by conditions or requirements that cannot be shown to be justifiable.

Outcome: The FSA recognises its responsibility under law to promote equality. In relation to procurement, it will adhere to its responsibilities under legislation to take equality into account when procuring goods, works or services from external providers. In so doing the FSA will require all vendors to give basic information of compliance with various legislations that apply.

<i>Actions</i>	<i>Date</i>	<i>Lead responsibility</i>
Ensure that all suppliers are aware of the provisions within the FSA's Diversity Policy Statement	Ongoing	Head of Procurement
To include diversity related evaluation criteria in the tendering stage of the procurement process	Ongoing	Head of Procurement
Review and revision of standard FSA contract conditions to commit suppliers to comply with relevant equality legislation	July 2012	Head of Procurement
All FSA procurement staff to complete the Civil Service Learning e-learning module <i>Introduction to Diversity</i>	July 2012	Head of Procurement
Review and revision of the FSA's Procurement Policy and procedures to ensure that equality legislative requirements are met	September 2012	Head of Procurement

Objective 4: Encourage behaviour and culture change to support all staff to reach their full potential and to proactively embed equality and diversity in their day to day work.

Outcome: the FSA employee engagement index to equal or exceed the Civil Service Benchmark by April 2015.

<i>Actions</i>	<i>Date</i>	<i>Lead responsibility</i>
Complete the roll-out of a training module for managers to complement the FSA Recruitment and Selection Policy	June 2012	HR Resourcing Manager
Undertake an equality analysis following the completion of the 2011/12 performance review process to ensure there are no unintentional discriminatory effects in its application.	December 2012	HR Employee Relations and Policy Manager
Feature a "Diversity Awareness" month on the FSA's intranet	April 2013	HR Employee Relations and Policy Manager
To develop and introduce an Equality Analysis e-learning module.	September 2013	Employee Relations and Policy Manager
Provide guidance to support the inclusion of an equality-related personal objective for all staff to be assessed as part of the performance review scheme.	April 2013	HR Employee Relations and Policy Manager
All staff to complete the Civil Service Learning e-module as a refresh to workplace diversity and an overview on equality legislation.	April 2014	FSA Team Leaders to ensure that all staff complete the module.