



Equality Impact Assessment

Modernisation Plans

September 2007

Equality Impact Assessment – Initial Screening

Section

1. Name of the function/policy to be assessed: Modernising Remploy

2. Background

Remploy is a non-departmental public body that was set up under the 1944 Disabled Persons (Employment) Act, with the first factory opened in 1946. Remploy went on to develop a factory network throughout the UK, operating in a variety of business streams. Since 1944 there have been significant changes within the labour market concerning diversity and discrimination legislation and attitudes in society more generally towards disability. Remploy has made changes throughout its history to respond to the changing external environment. In response to the decline in UK manufacturing, Remploy expanded into the service sector, creating businesses such as E-Cycle. In 1998, Remploy recognised that it could help meet the changing needs and aspirations of disabled people with more than factory jobs and expanded its operations to help them find work with other companies in mainstream employment. Remploy's Employment Services business (previously known as Interwork) provides support, advice, training and employment opportunities for disabled people, and supports and advises employers on the issues surrounding the recruitment and retention of disabled employees.

In the last decade changes to the world of work, legislation and society have become more visible. Key changes have meant that the world in which we work today is a very different place from even a decade ago. The nature of the labour market today, the way organisations operate, changes in regulation and legislation, as well as the aspirations and desires of disabled people mean that Remploy is now considering its future strategy.

In the past, many employment opportunities for disabled people have come through dedicated sheltered employment programmes centred on manufacturing. The current decline in manufacturing together with a shift towards the service sector has led to major impacts on employment for disabled people, in particular with a change in the nature of jobs available. The difficulty of ensuring manufacturing in the UK remains competitive has meant that sheltered employment in manufacturing for disabled people usually requires a significant subsidy to remain viable.

Government strategy increasingly focuses on improving the life chances, equality and the quality of life for disabled people¹. The Prime Minister's Strategy Unit's report calls for future government policy to be designed to ensure that in twenty years time any disabled person who wants a job and needs support to get and keep a job anywhere in the country should, wherever possible, be able to do so. The introduction of the Disability Discrimination Act (DDA) in 1995 and its subsequent amendments in 2005 put into law the civil rights of disabled people, making it a legal requirement for employers to eliminate discrimination against disabled people. This should work

¹ Improving the Life Chances of Disabled People. January 2005. The Prime Minister's Strategy Unit.

towards improving opportunities for mainstream employment for disabled people.

Given this context, Remploy has been working with the DWP on the direction the organisation should take in the future and how it should fulfil its role of creating independence for disabled people through work and maximising the number of disabled people it can support. These conversations reflect the changing environment in which Remploy is now operating, related to economic change, the aspirations of disabled people and the increasing strength and importance of the disability equality agenda.

Remploy has adopted the guidance issued by the Commission for Racial Equality (CRE), Disability Rights Commission (DRC) and the Equal Opportunities Commission as a systematic way of thoroughly assessing and consulting on the effects that the proposed Modernisation proposals are likely to have on people depending on their racial groups, disability and gender and also taking into account other minority groups. This guidance included conducting both internal and external consultations with appropriate stakeholders and a detailed statistical analysis on the outcomes of the Modernisation proposals.

3. Overall Context for the Proposals

Remploy has been allocated funding of £555 million over 5 years. If the status quo were maintained, the company would require funding of £750 million over this period. Therefore, changes need to be made. However, the ultimate goal of Remploy has not changed during its 62 year history; that is, to support as many disabled people and those who face complex barriers to employment into sustainable employment.

There are two critical elements:

- Much of Remploy's traditional business base has been lost to overseas competition, where labour costs are low. Despite moves into more added value, niche markets, and into the services sector, losses in the factory based businesses are likely to continue to rise
- Remploy, through its Employment Services business, has been extremely successful in helping disabled candidates to achieve employment with mainstream employers, such as BT, Asda and Christian Salvesen. Last year, Remploy achieved over 5200 job entries, a total that is greater than the number of disabled people employed in its own sites. These jobs were across a broad range of roles and sectors. The average length of employment for candidates placed by Remploy is 3 years, 4 months.

As a result of the above, for the average cost of employing one disabled person in a Remploy factory (£20,000) for one year, Remploy can help four people gain employment with mainstream employers each year. Remploy needs to reduce the average cost of its factory employees down to £9,000/year (which equates to the costs of a disabled period on Incapacity Benefit – source: Freud Report, 2007). This will free up investment to increase the number of people Remploy helps into mainstream employment and enable the business to operate within its funding limit.

4. What is the aim, objective or purpose of the policy?

Anne McGuire, Minister for Disabled People, asked Remploy to produce a modernisation plan to do two things. Firstly, to help many more disabled people into work each year and secondly, to stay within the grant of £555 million over the next five years. Both the Minister and Remploy strongly believed that an absolute commitment to no compulsory redundancies for disabled people had to be central to any plan.

5. What are the intended outcomes?

5.1 After the period of formal consultation, Remploy will submit a final plan to the DWP for approval

5.2 Once approved, Remploy will implement the plans in order to deliver the objectives outlined below: -

- a) Open up more Employment Services facilities around the country. These are to be mainly positioned in 'High Street' locations to aid accessibility for all our communities.
- b) By 2012 Remploy will be able to help 20,000 people achieve sustainable employment each year. This represents a four fold increase on the current rate
- c) Continue to run sustainable businesses, where there is a demand for their products and services. This means that it is proposed that production will stop on 43 sites.
- d) Of these 43 sites, it is proposed that 32 will close completely and that disabled employees of a further 11 would be able to transfer to a named Remploy factory if they wish.
- e) As part of the Modernisation proposals, there would be fewer management and staff roles. This is to ensure that the appropriate structures and roles are in place to support Remploy as it modernises.
- f) Operate within the £555 million budget over the 5 year period.
- g) Consultation is undertaken

The following Remploy factories would close under the proposals: Aberdare, Aberdeen, Abertillery, Aintree, Ashington, Bradford, Bridgend, Brixton (London), Halifax, Hartlepool, Hillington (Glasgow), Hull, Leatherhead, Leicester, Lydney (Forest of Dean), Manchester, Mansfield, Medway, Pinxton (Derbyshire), Plymouth, Poole, St Helens, Southend, Spennymoor, Stockton, Treforest, Wigan, Wisbech, Wishaw (Lanarkshire), Worksop, Wrexham and York.

The following factories would transfer to another site: Barnsley, Birkenhead CCU, Brynamman, Chandlers Ford, Jarrow, Newcastle-under-Lyme, Pontefract, Redruth, Stockport, Woolwich (London) and Ystradgynlais.

6. Who are the key stakeholders?

- Disabled employees in affected sites
- Non disabled employees in affected sites
- Suppliers
- Disabled employees in affected central functions and business offices
- Non disabled people in affected central functions and business offices
- Indirect impact on all other employees
- Trade unions
- Employers
- Disability charities
- DWP
- Family members of employees
- Carers/Advocates
- Voluntary sector organisations
- Jobcentre Plus
- Dependants of Employees
- Customers
- Local groups – Existing providers of support to disabled people

7. Is the aim of the policy or any of its intended outcomes designed specifically to:

- Eliminate discrimination? **Yes** – By increasing the number of disabled people supported into employment, this will help eliminate discrimination towards disabled people, including those from all backgrounds.
- Promote equality of opportunity? **Yes** – Mainstream employment means equality of opportunity for disabled people (all backgrounds) who will be supported into employment as part of the Modernisation proposals.
- Promote good relations? **Yes** – Integration into mainstream employment will increase understanding and awareness of disabled people (all backgrounds).
- Eliminate harassment of disabled people that is related to their impairment? **No** – the proposals are likely to be neutral in this area
- Promote positive attitudes towards disabled people? **Yes** – By removing the barriers faced by disabled people, and allowing disabled people to fully integrate into the workforce, this will promote positive attitudes towards disabled people
- Encourage participation by disabled people in public life? **No** Although the proposals are not designed to directly encourage

disabled people to participate in public life, part of the support provided to disabled people will include providing support to disabled people who wish to join a public body.

8. Does the function or policy involve or have consequences for members of the public or staff employed by Remploy?

YES *(However, it must be noted that these are only proposals at this stage)*

- A number of non disabled employees will be made redundant.
- Existing disabled employees will have wider employment opportunities outside of the factory environment.
- The expansion of the Employment Services Branch network will open up additional support and opportunities for disabled members of the public to gain sustainable employment.
- The current jobs of some disabled people will be impacted, although there will be no compulsory redundancies

**9. Is there any evidence that tells you how the function or policy is working or is intended to work for the intended stakeholders?
YES**

9.1 Disabled employees in affected sites and central functions and business offices

- There are existing policies in place for those employees who choose to take early retirement and/or voluntary redundancy.
- In the past twelve months Remploy has supported over 5,200 disabled people, with a range of impairments, gain employment with mainstream employers.
- Remploy currently has 687 disabled employees on Remploy's terms and conditions who are currently working at a host employer's organisation. Some of these employees have over 10 years service.
- There are existing policies in place for those employees who transfer to another Remploy site. These policies are agreed with the trade unions and are contained within the Remploy Accord (Site relocation).
- Any access needs or reasonable adjustments that may be required will be picked up as part of the induction process.
- A dedicated Helpline via telephone, minicom and e-mail has been established. Group consultations are to be carried out and the appointment of an external counselling service has been made available to support employees through the process.
- Employment advisors will provide one to one support to disabled employees to support them and host employers to achieve success in the placement.
- Where there is a need, advocates, family workers and support workers will be involved in assisting the employee to make the right decision. This practice already takes place when key decisions are required.
- Where barriers to communication exist e.g. language or employees who have hearing impairments, the necessary arrangements for interpreters etc. will be made. A comprehensive audit has been carried out on each of the sites to establish languages used and need for interpreters.
- Affected employees who remain on Remploy terms and conditions will be offered an indefinite period of support, i.e. if a work placement is not successful they will be offered support to find alternative employment
- All communications in relation to announcements made were available in 10 different languages. In addition to this, DVD's were provided to all employees including a transcript of the brief by a signer. For all ongoing briefs signers are used where required.
- Affected sites and locations have been appointed an Employment Services Advisor who is there to provide on-site support for disabled employees during each phase of the plan.
- A 'Modernisation Section' has been introduced on the Remploy intranet site as a means of providing up to date, consistent information to all employees.
- A weekly 'Modernisation Update' is sent to all Managers updating them on progress during the previous week for them to share with their employees during team meetings. This includes a summary of all the Questions and Answers raised via the Internal Helpline.

- Occupational Health Advisors will continue to visit each site to provide additional support to any employee who requires it
- A Pensions Helpline has been introduced to provide information to employees who have specific questions regarding the Remploy Pension Scheme
- An Employee Assistance Programme has been introduced through Focus EAP Ltd to provide confidential advice to employees on a range of areas including health, consumer issues, financial issues, debt management, budgeting concerns, legal issues, childcare and eldercare queries. Focus have a national network of qualified professionals with a helpline staffed by trained advisors. The helpline is available 24 hours a day, 7 days a week. Employees can ring the helpline to discuss any personal queries in confidence themselves or on behalf of others. Identified carers also have the opportunity to call the helpline on behalf of an employee. The helpline can be contacted via the main helpline number, minicom, typetalk or email. Employees are provided with unlimited telephone counselling and assessment of a personal issue or problem. The identities of callers are not passed to Remploy.
- A Benefits Helpline has been established to deal with any general benefit related queries and is accessed via a helpline number or via email.
- Penna Outplacement Support. Penna plc is one of the UK's largest HR consultancies operating out of 12 regional offices as well as flexible locations across the UK. Penna's outplacement programme is tailored to individual learning styles and Remploy has worked with them to design a menu of support activities available to Managers.
- A Penna Support Advisor was present at all affected sites to support the announcement of the proposed Modernisation plan and in the days immediately following the announcement. The advisors were there to help managers and employees deal with the news.
- Pre-Retirement courses to help individuals prepare and plan for retirement.
- Employee Assistance Programmes to provide confidential advice.
- For employees transferring to a named Remploy receiving site, support will be available to help them decide on the best way to travel to the new location.

9.2 Specific support in seeking alternative employment for disabled people in affected sites.

- Work trial periods either in a receiving Remploy site or with an external host organisation. These trials will enable employees to find out if they like the new job and if it suits their needs.
- Organising Job Search Workshops to equip employees searching for jobs with new employers.
- Assessing individual skills and abilities, which could include completing either a core skills assessment or a job skills assessment in order to assess abilities in a new/different working environment.
- Discussions regarding the type of work individuals would like to do and some practical considerations such as travel distance to a new job; help with transport, any carer needs, or the need to work flexible hours.
- Identifying and arranging appropriate training that may be needed to help individuals get a job with a new employer. Additionally, employees transferring to a receiving site within Remploy will have a full induction programme as well as an individual Development Plan

which will include any necessary training.

- Support with the writing of job applications and the preparation of CV's.
- Preparing for interviews. This could include explaining the interview process, exploring the types of questions that may be asked and the techniques that may be needed to answer questions, holding practice interviews, etc.
- Providing access to work advice by explaining to new employers what adaptations individuals need in order to do a job successfully.
- Finding out what benefits individuals would get in a new job and ensuring that individuals receive the benefits to which they are entitled.
- Helping employees when they start a new job by providing coaching and ensuring that the new employer has made the necessary preparations.
- Being available on an on-going basis once an individual has started a new job to provide support and advice.

9.3 Non disabled employees in affected sites and central functions and business offices

The following support and advice would be provided for non-disabled employees.

- Retirement courses - helping to plan and prepare for retirement.
- Financial advice - giving information to help manage finances.
- Benefit advice - making sure you get the right benefits in a new job.
- Existing redundancy and relocation policies will be used where required.
- Formal consultations will take with affected individuals
- Outplacement support provided by Penna plc. This support will be tailored to individuals and will include:
 - Initial diagnostic meeting with a 1:1 interview with a Penna consultant
 - Up to 5 follow-up meetings with a Penna consultant – 1 hour in duration
 - Access to the Penna on-line job search tool - for 6 months
 - Access to Penna's offices which provide a full range of job search support, including assistance with writing CV's, job applications, interview technique, and access to career search material – for 3 months
 - A range of self-study job search material to suit the individual (including books, tapes etc)
 - Access to 'webinar', a workshop via video conferencing – for 1 specialist subject
 - Attendance at a half day special topic workshop at a local Penna office
 - Attendance at a Group Job Search Workshop that will cover the main elements of job search support i.e. putting together a CV, interview skills and job search activity. Final content of the Job Search Workshop will be confirmed before individual consultation commences

In addition to the above support, Employment Services Advisors will work with individuals, should they request help on searching for a job with

another employer. The support provided will depend on individual circumstances and will cover the same support as that for affected disabled employees as detailed above.

9.4 Disabled employees in affected central functions and business offices

As 9.1

9.5 Non disabled people in affected central functions and business offices

As 9.3

9.6 Indirect impact on all other employees

- Receiving factories will host familiarisation days for factory employees who have the option of a transfer.
- Non affected employees (i.e. those who are not at risk of redundancy) also have access to the helpline and can raise questions or concerns with their line manager
- Disabled employees based at receiving sites will also be offered the same level of support and options as those in 5.1. (subject to vacancies etc.)

9.7 Trade unions

- Consultation is taking place at a national level
- Trade union representatives will be involved in supporting their members at group and individual consultations

9.8 Employers

- With the support of Remploy's Employment Services, over 5200 disabled people were successfully employed with a range of employers last year.
- Employment Advisors are trained to provide employers with support and guidance in relation to access needs.
- Employers are given ongoing support to maintain the employment of disabled people, for example if the disabled person's needs change or there is a change of role within the organisation, support will be provided in relation to access needs and reasonable adjustments.

9.9 Disability charities

- Some of the charities will benefit from Remploy staff working at their premises without incurring any costs.
- Charities employing Remploy personnel will be fully supported by Remploy Employment Advisors to ensure access needs and reasonable adjustments are made.
- Remploy will continue to pay the employee so no financial burden will be placed on the charity
- Charities that have been consulted about the Modernisation proposals include Scope, Mind, Mencap, Leonard Cheshire, RNID, British Heart Foundation, Employers Forum on Disability, RNIB, Disability Alliance, Alliance for Inclusive Education, Spinal Injuries Association, Breakthrough UK, Skill, Papworth Trust and RADAR

9.10 Department for Work and Pensions

- More disabled people will benefit from employment as part of the Modernisation proposals. It currently costs £20,000 a year to employ a disabled employee at a Remploy factory. It only costs an average of £5,000 per person as a one off cost to achieve a job entry with a mainstream employer
- Unemployment amongst disabled people will be reduced significantly.
- Ongoing consultation is taking place.

9.11 Family members of employees

- Family members, advocates, or carers of disabled employees were invited to attend the initial briefings on the Modernisation programme as required.
- Family members, advocates, or carers of disabled people will be invited to individual consultations, should there be a need or should this be a desire of the employee.
- The Employment Services Advisor at each affected site and location sent a letter to carers/ parents explaining what was happening as part of the Modernisation proposals. This letter included the options and a support leaflet and invited them to make contact with any immediate questions.
- Carers/parents were asked what level of ongoing contact they would like during the process and the Employment Services Advisors have tailored the level of contact based on individual requests received.

9.12 Carers/Advocates

- As 9.11

- Carers and advocates can contact the independent counsellors appointed by Remploy (confidentially) or contact Remploy directly in relation individual concerns.

9.13 Voluntary / social sector organisations –

- As 9.8 + 9.10

9.14 Jobcentre Plus

- As 9.10

9.15 Dependants of Employees

- Independent financial advice is to be provided to all affected individuals to assist them in making financial decisions.
- Externally appointed counsellors have been allocated to each site so that employees can share any concerns and identify support that may be required.

9.16 Customers

- Where there is a viable business/customer this work will be transferred to an alternative site
- All affected customers are being kept informed of key stages of the Modernisation proposals to allow them to plan their business accordingly.

9.17 Suppliers

- All affected suppliers are being kept informed of key stages of the Modernisation proposals to allow them to plan their business accordingly

9.18 Other support providers to disabled people

- It is envisaged that as a result of the opening of Remploy branches, the profile and ability of disabled people will be raised, therefore this will increase the opportunity for other providers
- As part of the Modernisation proposals, Remploy will seek to work in partnership with local communities and community groups to ensure that local people have an opportunity to help shape the way Remploy delivers services.

- Remploy conducts all of its business in an ethical manner

9.19 Remploy's historical performance in supporting disabled people into mainstream employment

Breakdown by Impairment

Count of Candidate Impairment	YEAR				Total	% of Total Placements	% Increase Since 04/05
	2004/05	2005/06	2006/07				
Chest Breathing Problems	83	100	119		302	2.2%	43%
Diabetes	28	61	84		173	1.3%	200%
Hearing Impairment	167	167	194		528	3.9%	16%
Visual Impairment	127	111	123		361	2.7%	-0.01%
Epilepsy	50	72	139		261	1.9%	178%
Heart/Blood Pressure	87	100	130		317	2.3%	49%
Learning Difficulties	609	657	850		2116	15.9%	39.5%
Mental Health	620	855	1363		2838	21.4%	119%
Mobility/Dexterity	476	662	679		1817	13.7%	42%
Neurological	107	146	165		418	3.1%	54%
Other Impairment	280	252	338		870	6.5%	20.7%
Prefer not to say	19	11	25		55	0.4%	31%
Impairment of Arms/Hands	189	155	195		539	4%	3%
Impairment of Legs/Feet	281	219	225		725	5.4%	-20%
Neck/Back Impairment	370	340	414		1124	8.4%	11%
Progressive Illness not covered	13	37	42		92	0.6%	223%
Respiratory/Heart	100	40	46		186	1.4%	-54%
Skin Conditions/Allergies	9	11	37		57	0.4%	311%
Speech Impediment	12	13	32		57	0.4%	166%
Stomach/Liver/Kidney/Digestion	49	58	87		194	1.4%	77%
Not known	114	76	41		231	1.7%	-65%
Total	3790	4143	5328		13261		

People with mental health conditions face some of the most severe exclusion in Britain, including an 80² percent unemployment rate. 21.4% (2838) of the people who Remploy have supported into mainstream employment over the past three years have a mental health condition and the numbers have increased year on year from 620 in 2004/5 to 1363 in 2006/7.

Overall, disabled people with a diverse range of disabilities have been supported into mainstream employment. The Modernisation proposals will affect a total of 2227 disabled people, all of whom will be guaranteed the opportunity of continued employment. Over twice this number of people were supported into mainstream employment in 2006/7.

9.20 Historical performance – Supported into mainstream employment by Remploy - Gender

	2004/05		2005/06		2006/07		Total for	% for
Gender Breakdown of Candidates	Totals	%	Totals	%	Totals	%	Total	%
	3790		4143		5328		13261	
Female	1313	34.6	1523	36.8	1954	36.7	4790	36.1
Male	2471	65.2	2618	63.2	3361	63.1	8450	63.7
Not Known	6	0.2	2	0.0	13	0.2	21	0.2

<u>Existing Workforce</u>	Totals	Male	%	Female	%
Total number of people Employed	7033	4939	70.2	2094	29.8
Total number of people impacted	2515	1778	70.7	737	29.3
Composition of staff post Modernisation	2003	1383	70	620	30

Gender - Remploy Workforce

The gender balance of Remploy's own workforce as a whole is 70% male and 30% female. The Modernisation proposals will have a proportionate impact on both males and females. The composition of the workforce post modernisation will be 69% male and 31% female, therefore there is not going to be an adverse impact on either males or females.

Recruitment figures for the first quarter of 2007 identified that 56% of applications for staff positions were made by females compared to 44% of males. Actual appointments made were 59% female and 41% male. Again there is no evidence of any significant disproportionality and historical gender imbalances are being addressed.

Gender - Clients Placed into mainstream employment

Although the total number of candidates supported into mainstream employment has increased by 90% since 2004/5, the balance between male and female clients has remained fairly static at 64% for Males and 36% for females.

9.21 Historical performance - Supported into mainstream employment by Remploy - Race

<u>Candidates Supported into Mainstream Employment</u>	2004/05		2005/06		2006/07		Total for	% for
	Totals	%	Totals	%	Totals	%	Period	Period
Total No. of candidates who declared Ethnicity	3307		3830		4864		12001	
White	3172	95.9	3647	95.2	4583	94.2	11402	95.0
Mixed Race	9	0.3	23	0.6	39	0.8	71	0.6
Asian or Asian British	66	2.0	92	2.4	173	3.6	331	2.8
Black or Black British	46	1.4	58	1.5	57	1.2	161	1.3
Chinese or Other Ethnic Group	14	0.4	10	0.3	12	0.2	36	0.3

<u>Remploy Workforce</u>	Totals	White	%	Asian	%	Black	%	Chinese	%	Other	%	Not Stated	%	Unknown	%
	No.s														
Total number of people Employed	7033	6068	86.28%	166	2.36%	92	1.31%	4	0.06%	323	4.59%	10	0.14%	370	5.26%
Total number of people impacted	2515	2365	94.04%	32	1.27%	27	1.07%	2	0.08%	65	2.58%	1	0.04%	23	0.91%
Composition of staff post Modernisation	4518	3703	81.96%	134	2.97%	65	1.44%	2	0.04%	258	5.71%	9	0.20%	347	7.68%

Race - Remploy Workforce

Employees from a white background are impacted the greatest by the Modernisation proposals (94%). The composition of the workforce post the Modernisation proposals will see the percentage of white employees reduce from 86% of the workforce to 82%. The main reason for this is that 86% of the current workforce are from a white background. The ethnicity of 5% of the workforce is not known.

Race – Candidates supported into mainstream employment

95% of candidates supported into employment were from a White background, the second largest group of people supported into employment were Asian or Asian British at 2.8%, followed by Black or Black British at 1.2%. There is a disproportionate amount of people from Black Minority ethnic groups supported into employment.

10 From the available evidence, is there any reason to believe that people are affected differently or are likely to be affected differently according to any of the listed equality strands, for example, because they have different needs or priorities?

Affected employees may be impacted differently according to their individual circumstances and potentially due to their disability, race or gender. However, Remploy has extensive experience of supporting people into mainstream employment across a wide range of impairments, successfully achieving over 5200 job entries last year. This included those with mental health issues or learning disabilities, which combined accounted for 40% of the total job entries.

A separate engagement and involvement exercise took place to identify the barriers faced by disabled people from BME communities in accessing training, employment and services. The consultation involved disabled people, groups representing and/or consisting of disabled people, specialist employment services focusing on supporting BME disabled people and families and carers of disabled people.

The purpose of this exercise was purely to identify the barriers faced by the above group, **prior** to the adjustments being put in place. The consultation took note of all the barriers faced by BME communities accessing training, employment and services.

Race/Religious Belief

- Language needs
- Respecting diverse cultures (making provision for cultural differences such as single sex provision for changing facilities, a space to pray etc)
- Translation of documents/leaflets into different languages.
- Availability of interpreters – check with service users/employees on preferred method
- Use of DVD's and cassettes as an alternative option to documents/leaflets (when required)
- Understanding of potential differences in work pattern
- Food or dietary requirements
- Recognition of Holy Days, (e.g. Sikh, Muslim, Hindu, Jewish, Chinese)
- Potential unease/lack of confidence in dealing with authority, involvement of family, advocate or carer to provide support.
- Lack of awareness as to whether a service exists/is available/what it does
- Timely communication
- Observing dress codes

Gender

- Women or men feeling uncomfortable dealing with employees of the opposite sex.

- Changing/sanitary facilities
- Consideration of carers responsibilities (the assumption that women are the main carer)
- Long-hours culture, which excludes people with carers responsibilities
- Lack of representation at meetings/on decision making boards
- Lack of equal access to training and development etc (predominantly women who work part time)
- Understanding of potential differences in work pattern

Disability

- Physical access issues, for example level entrances for wheelchair users
- Removal of physical access barriers
- Availability of induction loops, tactile signage, high contrast/visible pathways
- Food or dietary requirements
- Raising staff awareness of responding to disabled people
- Availability of advice on services in a range of different formats
- Availability of signers
- Producing documents in accessible formats i.e. large print, easy read or background colour of documents.
- Promoting independence
- Transport

11. Is there any evidence that the function or policy in any way discriminates or might discriminate unlawfully, directly or indirectly against people from any of the listed strands, for example, in terms of access to a service, or the ability to take advantage of an opportunity?

There is no evidence to suggest that the Modernisation proposals will unlawfully discriminate directly or indirectly against any Remploy employees.

All disabled employees will be treated equally but individually, according to their needs and aspirations. They will have access to a highly trained Employment Services advisor who will work with them on a one-to-one basis to ensure that they are fully aware of the options available to them and the potential impacts of each option. This will include financial, benefits and pensions advice.

This support will continue for as long as necessary, including once a job has commenced, and will be available in formats suitable for individual needs.

Potential employers will also receive support in terms of how best to accommodate the needs of the individual, special requirements etc.

All of these types of support are successfully applied by Employment Services as part of their normal work in achieving thousands of job entries each year.

12. Is there any evidence that people from the groups covered by the listed strands have or may have different expectations of the function or policy in questions?

Yes – Point 6 above identifies some of the expectations of different strands

13. Is there any evidence that the function or policy affects or might affect relations between groups covered by the listed strands, for example is it, or might it, be seen as favouring a particular group or denying opportunities to another?

Remploy will provide extensive support to all affected employees and potential employers. However, only disabled employees have the 'no compulsory redundancies' promise.

When the final plan is implemented, any affected non-disabled employee who has not taken voluntary redundancy, early retirement or secured an alternative role in the company will be made redundant.

A fair redundancy procedure will be used for the redundancy process. This will only be implemented after a period of consultation with affected employees before redundancy notices issued.

Favourable treatment towards disabled staff has been explained to non-disabled staff, it has also been custom and practice for no compulsory redundancies for disabled staff since the formation of the organisation.

As the favourable treatment towards disabled people has been part of Remploy's culture since its formation, there is no evidence to suggest that the Modernisation proposals will affect relations between disabled and non disabled people. The Modernisation proposals impact on staff from different race and gender groups proportionally.

14. Have previous consultations with relevant stakeholder groups or individuals indicated that policies of this type create exclusion or hold specific challenges for any of the listed groups?

The results of Remploy's external consultation have demonstrated that quite the reverse is true in terms of exclusion.

(The following quotes are taken from research carried out on behalf of Remploy by The Work Foundation)

Individuals all have different needs and their skills should be explored. People should be recruited based on their skills.

All interviewees were keen to stress that each person's situation is different:

"It is possible to draw common factors between disabled people but they are all individuals and should be treated as such... You can look at how to break down a range of barriers but you then need to consider a person as an individual".

Several interviewees highlighted that people with similar disabilities can face similar barriers to entering the labour market but a disability should not be the only and key differentiator. Disabilities affect people in different ways and therefore it is almost impossible to make generalisations about the needs people will have. Moreover, often people face more than one barrier to the labour market, for example a disability, long periods of unemployment, or a criminal record. Interviewees stressed that it is crucial to ensure that people are treated as individuals and their needs and abilities are assessed individually: "The first thing is that everyone must be treated as an individual. Everyone's circumstances are different." The time at which people acquire a disability will alter the experiences they have had and therefore their abilities.

Interviewees emphasised that people – whether disabled or not - will require different levels of support and different amounts of time to fulfil their aspirations. Interviewees also stressed the need to work closely with individuals to help them to explore their own wants and needs: "you can't just design something and impose it from the top – it has to be responsive".

Interviewees argued that disabled people should be judged on their skills and abilities rather than on their disabilities:

"Diagnosis of a disability tells you nothing about the skills someone has"

Interviewees stressed the fact that employers need skills and when seeking employment therefore everyone, with or without a disability, must sell their skills and abilities to employers. In line with previous research³, one interviewee commented that disabled people who are often socially excluded are likely to under perform in education and therefore less likely to have the necessary skill sets or qualifications to enter the labour force without additional training. Interviewees emphasised that individuals with particular disabilities may require more

support to explore and identify their own abilities and skills so that they know what they can sell to employers and what they want to get from employers. Disabled people may therefore also require more support and training to gain the necessary skills to meet employer needs.

In a tight labour market employers cannot afford to overlook the skills of a diverse labour market

Benefits to employers

All interviewees emphasised the need to truly understand the employer needs and find a way to engage with employers. Interviewees were in no doubt that one of the keys to getting more disabled people into good jobs in mainstream employment is to sell the benefits to employers of tapping into the talent pool of people with disabilities. The business case for equality and diversity has been well documented⁴. Interviewees emphasised the need to highlight the benefits to employers of the capabilities disabled people have as well as the other specific benefits there are to employing people with disabilities. For example, several interviewees commented on the likely higher rate of retention resulting from hiring people with disabilities:

“It’s very unhelpful to attempt to sell to an employer people on the basis of disabilities –if you focus on their skills then there’s no difficulty. There is an absolute willingness on the part of the employers if it’s framed in the right way”.

“One thing we’ve found is that certainly in some locations because people have learning disabilities they are thrilled to have a job. Their confidence improves immediately, they have a sense of self worth they didn’t have before, they don’t want to take holidays or sickness, they are the first there in the morning. They become an exemplar employee so it boosts everyone’s morale. This is a success story which I think you can replicate”.

“In today’s labour market, employees have the responsibility for making their own way through that labour market. In the main if you have someone with good skills and a good deal of aspiration there are few barriers to people changing jobs. Changing jobs is now seen as a positive; often people take on a job with little sense of responsibility to the employer. However, when someone has faced difficulty in gaining employment but has been out of the market, if they find an employer willing to give them opportunity and good working conditions they often develop a sense of loyalty that isn’t quite so prevalent in the workplace as a whole. They form a slightly closer bond between employee and employer and there is a willingness to stay and prove value. For example, working with people who have been in prison, offenders have a lower turnover rate once in employment.”

One interviewee commented that: “It is only the employer who can determine the success [of welfare to work policy]. If employers say no, it doesn’t matter what you do to candidates you will fail”. Most interviewees stressed that there were barriers to be overcome but that with persistence and the right approach it was possible to engage more employers and moreover that it was essential to do so:

“You have to engage with employers so that instead of “pushing people towards employers” you have to train them up and push them out into the workforce. We must also “pull” and get employers to pull disabled people together because unless you have pull and push you’re unlikely to achieve much”.

Policy versus practice

Many interviewees stressed that employers feared litigation action from mistakes they might unintentionally make when employing disabled people. Some interviewees felt that highlighting the possibility of litigation as a risk to employers was a positive way of making them change. Some though felt that the fear of litigation was used by employers as a reason to avoid employing people with disabilities. For example, some interviewees felt that where employers saw only the risk, they would meet their obligations of interviewing people and then argue another candidate was better to avoid employing someone with a disability. Many interviewees emphasised that with the right engagement it was possible to overcome the barriers of policy versus practice. One interviewee pointed out that in some instances although a senior team may be positive towards employing people with disabilities, those on the front line in charge of recruitment might not be fully able to put that into practice:

“What works against the employment of people with disabilities, is that generally HR policy in anything other than small business (less than 15 employees), senior managers or HR professionals will say the organisation needs to make a better job of making jobs for people with impairments, but at same time they want performance of front line people. Sometimes it goes wrong as recruitment to front line is made by junior managers – they’re being asked to meet demanding targets so the more junior manager thinks, my career and success depends on practical targets and as the individual making the decision they think someone with an impairment won’t be able to contribute as much to that as another person – same misconception for employers in generic sense. So however well informed management is, those views are embedded lower down.”

In a high pressure environment people may use prejudices to make decisions over who will be the most productive. Interviewees stressed that breaking down those prejudices is a key task. Equally, some interviewees argued that often employers are unaware of the barriers they put up, for example recruitment sifts of applications via a telephone prevents many deaf people from submitting an application. One interviewee pointed out that once a barrier is broken down then often employers find they are able to access and recruit more people with similar disabilities.

Awareness and education

Interviewees emphasised there is a need for employers to ensure employees go through disability and distress awareness and disability equality training within their organisations. One interviewee commented that “using the position of disability rights means you can use risk to attract the attention of employers but few people understand the difference of turning people down because they are black or disabled”. One interviewee commented on how the task of equality meaning meeting different needs can be particularly challenging for

the public sector:

“We can see that the equal ops mantra permeates the civil service and public sector – training everyone the same. If we have to treat disabled individuals differently under the new legislation then that can be a real stretch”.

However, several interviewees argued that it is first key to improve employer awareness and education. Several interviewees stressed that there is a need not only to make information available to employers of what and how to do things but also to sell the benefits to them. They emphasised a need to go into organisations and work closely with them to help them understand their needs as well as for intermediaries to truly understand the skills gap that needs filling:

“There is a good match between desire and demand. It is a question of how to capitalise on it. There is a pretty good match between desire and demand but it’s incumbent on a number of institutions to maintain the excitement and drive for employing disabled people in mainstream employment”.

Interviewees commented that attitudes of employers to people with disabilities are often different depending on when the disability was acquired:

“Employers, especially in the public sector but not only there, have adopted a business case, positive policy, to remove the obstacles in their own organisations towards employing disabled people, the barriers to retaining people who have got impairments since beginning their jobs”.

There is evidence that suggests that there is under representation of BME clients accessing the service we provide (5%). There is also under representation of women accessing the service (36%)

• **Is a full impact assessment required?**

YES

Full Equality Impact Assessment

1. A full impact assesment is being undertaken because the aim of the policy or any of its intended outcomes are designed specifically to address the aims of the statutory general equality duties or there is evidence of impact for this policy in relation to: Remploy Modernisation Proposals

Please provide a summary of the potential impacts identified during the initial screening and as part of this full impact assessment.

There have been some potential impacts identified as part of the consultation exercise. These are detailed in section six of the initial screening process and as part of the action plan after section six of this document.

2. Can the impacts you identified during the initial screening be justified and the policy implemented without making adjustments?

No -

Please set out the basis on which you justify implementing the policy without making any adjustments.

Adjustments are to be made

3. Make changes to the policy to mitigate or eliminate impacts.

As part of the proposals, there would be options available to disabled and non-disabled employees.

Remploy recognises that the Modernisation proposals would be a big change. Therefore, the company will ensure that everyone has the time to understand the proposals and get the information and support they need to help them through the changes.

In addition:

- Letters have been written to all employees outlining the proposals (with letters sent to parents/carers as appropriate). Parents, carers, advocates or any other representatives were invited to the initial briefing and will be invited to the one to one consultations.
- Signers/interpreters were available on site for the hearing impaired for the announcements. An analysis was done on each site to identify language needs. Interpretation and translation will be provided where required.
- Leaflets were given to all employees affected outlining the potential options available to them
- Trained counsellors were on site for the announcement and for the following four weeks, as required
- A 'helpline' (including minicom) is available throughout the consultation period to enable employees to ask questions

- An 'email helpline' is available, as above
- Questions leaflets are available at each location for written questions. Verbal and written communication has been carried out. Information will be made available in alternative formats/community languages upon request.
- An independent support service is also available and offers advice on matters including legal, financial or family problems.

(A comprehensive list of support and adjustments is provided as Part 5 of the initial screening and the table after Point 6 of the full impact assessment)

4. Who needs to be consulted and involved on the proposed changes? (refer to stakeholder groups)

Remploy will continue to actively consult with employees and the trade unions during the 90 day formal consultation period. We will also work very closely with the DWP, MPs, employers and disability groups to ensure that the final plans are implemented as effectively as possible and that the needs of affected employees are always held uppermost as part of the support available.

An Internal Impact Assessment team has been trained to carry out Impact Assessments. They will be sent a copy of the completed EIA for comment. A sub group has been identified from the EIA team and they are to be invited to a workshop.

A consultation exercise has been carried out with Equality specialists in relation to the actions proposed to mitigate potential impacts on disabled and non disabled BME communities and women, ways to maintain positive working relationships and ways to maximise the opportunities for disabled people from BME communities and women

5. Please set out the plans for consultation and for the involvement of disabled people, where this is relevant

- Consultation has been taking place with the trade unions and management representatives and will continue on an ongoing basis.
- Charities have been consulted
- Disabled employees who are employed in external organisations and who have been supported into employment in a similar manner to the proposal.
- Research carried out by The Work Foundation
- Workshops which included disabled people from BME communities, carers, and family members.
- Internal Equality Impact Assessment consisting of disabled and non disabled people from across the organisation.
- External Equality Impact Assessment consisting of BME and Gender groups.
- Equality Impact Assessment to be published on Internet and Intranet inviting comment and contribution.

- Equality Impact Assessment to be distributed to key stakeholders for contribution.
- EIA is to be distributed to Equality specialists for comment

Action Plan – Incorporating all consultation, including final consultation on proposed actions.

Issues Identified	Actions to be Implemented	Progress Already Made	Responsibility
<p>Communication Barriers.</p> <p>Availability of advice on services in a range of different formats i.e. large print, easy read or background colour of documents.</p> <p>Availability of signers</p>	<ul style="list-style-type: none"> • Translators and interpreters to be provided where a need has been identified. • Information will be made available in alternative formats and languages upon request. • Family members, carers, advocates will be invited to one to one consultations which will help identify individual communication and access needs 	<ul style="list-style-type: none"> • A survey has already been carried out on each site to establish languages spoken • Family members, carers, advocates were invited to attend original briefings to aid communication • DVD's have been produced of the initial announcement of the modernisation proposal • Remploy has a network of signers across the country. 	<ul style="list-style-type: none"> • Line Managers/ Employment Advisors
<p>Lack of awareness as to whether a service exists/is available/what it does</p>	<ul style="list-style-type: none"> • Disabled people who remain on Remploy's payroll will be provided support on an indefinite basis, provided they remain a Remploy employee. • Remploy is going to increase partnership working with community groups and employers, to increase the profile of what it does. • Each region/ operating areas will identify its own engagement strategy to increase awareness; this could include targeted 	<ul style="list-style-type: none"> • One to one consultations and support will be provided to all disabled employees. • Remploy hold job fairs, recruitment events etc. which are accessed by all members of the community. • Remploy are opening more branches in 'high street' locations. 	<ul style="list-style-type: none"> • Line Managers/Employment Advisors

	campaigns in relevant community languages via written materials in community languages, presentations at community centres etc.		
Availability of induction loops, tactile signage, high contrast/visible pathways Physical access issues for example level entrances for wheelchair users		<ul style="list-style-type: none"> • Before employees are placed with mainstream employers, we will establish access needs with the individual and employer. • We already provide support to employers on making reasonable adjustments for existing and new employees 	
Respecting diverse cultures -	<ul style="list-style-type: none"> • Individual, Family, carer and advocate involvement will help identify any additional cultural needs to Remploy employment Advisors, who will assist with the transition from Remploy to the host employer 	<ul style="list-style-type: none"> • There is an understanding of diverse cultures of existing employees. • Ongoing training is provided to all staff to increase awareness or on diversity and equality 	<ul style="list-style-type: none"> • Line Managers/ Employment Advisors
Potential lack of confidence to in dealing with authority	<ul style="list-style-type: none"> • Alongside building confidence skills, Remploy will provide all necessary training and support to ensure disabled people are successful with their placement. • Work trials can be arranged for employees with social enterprises and charities to help with the transition 	<ul style="list-style-type: none"> • Remploy Employment Advisors and line managers already provide one to one support to all disabled employees. • Independent counsellors have been appointed to provide support to all affected employees. 	<ul style="list-style-type: none"> • Line Managers/ Employment Advisors

Food or dietary requirements	<ul style="list-style-type: none"> • Employment Advisors will discuss these requirements with host employers 	<ul style="list-style-type: none"> • Any specific needs in relation to disability or religion/culture can be discussed at individual consultations. • 	<ul style="list-style-type: none"> • Employment Advisors
Potential differences in work pattern		<ul style="list-style-type: none"> • Remploy already works with the employee/candidate and employer to achieve the best fit for both, taking into account caring responsibilities etc. • Remploy already facilitates part time working, job share etc. 	
Women or men feeling uncomfortable dealing with employees of the opposite sex.		<ul style="list-style-type: none"> • Remploy has a good gender balance of Staff who support disabled people in gaining employment. • Employees who feel uncomfortable dealing with employees of the opposite sex. Can discuss this with their line manager, counsellors, colleague who they can confide in or their advocate, family member or carer. 	<ul style="list-style-type: none"> • Line Managers/Employment Advisors
Lack of representation at meetings/on decision making boards	<ul style="list-style-type: none"> • As part of the Modernisation proposals, regular briefings and consultations are carried out. These encourage questions all questions are responded to individually. 	<ul style="list-style-type: none"> • Disabled people already sit on most of the negotiation bodies at Remploy • Remploy has a National Diversity forum which consists of diverse 	<ul style="list-style-type: none"> • Line Managers/Employment Advisors

		representation in relation to diversity and hierarchy.	
Lack of equal access to training and development etc (predominantly women who work part time) Understanding of potential differences in work patterns		<ul style="list-style-type: none"> • Remploy works with individuals on a one to one basis to identify training needs and methods of delivery. • Remploy works with individuals and employers on a one to one basis, to try and seek the best solution. 	
Promoting Independence		<ul style="list-style-type: none"> • Remploy works with every individual so that they are able to fulfil their maximum potential. • Remploy works with every individual as an individual to identify and develop their skills so that they develop their capacity 	
Raising staff awareness of responding to Disabled People		<ul style="list-style-type: none"> • Staff who provide support to disabled people gaining employment have all undergone disability awareness training. Training in equality is ongoing for all our staff • Relevant guidance is provided to host employers via Remploy employment advisors 	
The biggest impact is going to be on white staff		<ul style="list-style-type: none"> • The selection criteria for redundancies is based purely on a business case to 	

		remain within the £555 million funding and increase the number of disabled people we support into mainstream employment.	
Transport		<ul style="list-style-type: none"> • Transport needs are discussed with each individual as part of access to work 	
Some disabled people will choose voluntary redundancy rather than face the disruption	<ul style="list-style-type: none"> • Once the plans are approved we will implement one to one consultations. • Remploy will ensure the correct level of support is made available to individuals via professionals, family/carers/advocates to ensure that maximum support is provided to disabled people. • Remploy will try to place disabled people into host employment with some of their peers • Remploy will be offering work trials, which will be backed up with support from experienced employment advisors. • Remploy will make sure that all the options available to employees are clearly understood, as are the implications of each option. • As Remploy will be dealing with existing employees we have knowledge of those employees who may be vulnerable to this 		<ul style="list-style-type: none"> • Line Managers/Employment Advisors

	process and will ensure that relevant support is provided to meet their individual needs		
Disabled people who find it harder to get work and to get back into work - even though no disabled people will be made redundant on compulsory grounds, they will still be displaced.	<ul style="list-style-type: none"> • Remploy will discuss desires and concerns on a one to one basis and ensure that the correct` level of support is made available to individuals. • Remploy will make arrangements for those individuals who are not able to make an immediate transition into mainstream employment these will include: <ul style="list-style-type: none"> • Work trials • Placement at a charity shop or other social firm • Training and development in building confidence and skills • Placement at a local authority sheltered workshop. 	<ul style="list-style-type: none"> • Remploy already support disabled people with a range of impairments into employment. • It is accepted that there will be disruption to disabled employees who face a change in roles, however this will only be a short term impact. There will be long term benefits to many more disabled people as part of the proposals. 	<ul style="list-style-type: none"> • Line Managers/Employment Advisors
Disabled people who do not take voluntary redundancy but are displaced will loose skills and motivation between the period they are displaced and found an alternative role	<ul style="list-style-type: none"> • As soon as an individual becomes free from their existing roles, they will be involved in various activities which include:- <ul style="list-style-type: none"> - Training and development - Interview & job application skills - Job search - Work trials - Development of personal skills such as confidence building. 		<ul style="list-style-type: none"> • Line Managers/Employment Advisors

<p>How do we ensure all policies are clearly understood</p>	<ul style="list-style-type: none"> • All relevant policies which are going to impact on employees will be discussed as part of the one to one consultation. • External support in the form of interpreters, translators, family, carer/advocate support will be made available to ensure that policies and processes are clearly understood 	<ul style="list-style-type: none"> • Any questions or queries related to policies are collated on a weekly basis, with a copy of the question and response sent to all managers so that everyone is aware of the query in case they had not picked it up 	<ul style="list-style-type: none"> • Line Managers/Employment Advisors
<p>How can we be sure that disabled people are placed in an environment which is free from discrimination?</p>	<ul style="list-style-type: none"> • Employment Advisors will work with both the employer and employee to ensure a smooth transition 	<ul style="list-style-type: none"> • The equal opportunities policy has been revised to incorporate our expectations of partners/customers and suppliers in relation to equality • There is a comprehensive guidance document in place which incorporates equality into procurement. This incorporates a questionnaire in relation to diversity & equality for all suppliers, this will be used for new placements • There are existing proven relationships with existing customers, where disabled employees are placed. • 	<ul style="list-style-type: none"> • Employment Advisors
<p>What if disabled people are expected to travel further as a result of their relocation, this may increase their overall</p>	<ul style="list-style-type: none"> • All individuals will be treated on a one to one basis, full account will be taken of individual impairments, in relation to this 		<ul style="list-style-type: none"> • Line managers/ Employment Advisors

working day / week and have an impact on their impairment	specific query we could alternate breaks etc. as a reasonable adjustment <ul style="list-style-type: none"> • There will be one to one discussions with all disabled people who are placed in external organisations, in relation to transport needs 		
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7. Please set out the arrangements for monitoring and reviewing the policy

- Monitoring grievances
- Monitoring take up of each of the options
- Monitoring success of each of the options
- Monitoring vacancies available in and around the sites faced by closure

The monitoring data will be scrutinized via the National Diversity Forum which has a diverse representation and meets quarterly.

Post implementation review to be carried out by internal Impact Assessment team led by National Diversity & Inclusion Manager. The Internal Equality Impact Assessment Team consists of a diverse mix of staff and business areas

8. Arrangements for publishing the completed Impact Assessment

- A copy of the completed Impact Assessment will be published on both the Internet and Intranet
- A copy will be distributed to all those who have been consulted
- All employees will be briefed on how to access a copy via team briefs
- Copies will be made available in alternative formats and languages upon request
- A copy will be submitted to the Department for Works and Pensions
- A copy will be submitted to the Government as part of the Modernisation Proposals.

Name	Majid Hussain
Business Unit or Area	Corporate
Date	September 2007

Acknowledgements

Internal Impact Assessment team
NEP
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Disability Alliance
Mind Cymru
CRE - Manchester
Breakthrough UK
Mind
Leonard Cheshire Scotland
Alliance For Inclusive Education
Greater Manchester Coalition Of Disabled
People

NHS Northwest
Bolton Primary Care Trust
NHS North West
Vision 128 Middleton Rd, Oldham
Lancashire Teaching Hospitals NHS
Foundation Trust
3rd Hand Oldham
Cheshire Gypsy and Traveller Voice
Black Ethnic Minority Network Merseyside
Rochdale Centre for Diversity
Pakistani Community Centre
Inter-faith Forum
North West Regional Development Agency
Oldham Inter Faith Forum
Lancashire Police Authority
GM Council for Voluntary Organisations
United Response
New Deal for Communities
Age Concern
Tameside Equality & Diversity centre
Manchester Council Community Relations
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Positive Steps Oldham
Help The Aged
Positive Steps Oldham

Oldham PCT
Work Solutions

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