

## CNPA RACE EQUALITY SCHEME 3 YEAR REVIEW AND ACTION PLAN June 2010

### INTRODUCTION

1. The CNPA published its first Race Equality Scheme (RES) in November 2007 setting out how it will promote equality of opportunity for people with different racial backgrounds in the delivery of its public functions and as an employer. The CNPA must review its RES after 3 years and publish a new RES on 30 November 2010. To streamline reporting of our Equality Schemes (covering disability, gender and race) we intend to publish our RES along with the review of our Gender Equality Scheme on 29 June 2010.
2. This paper firstly sets out what is required by CNPA under current race legislation. This is followed by a summary of objectives and progress made on CNPA's existing RES. The final section sets out our new Action Plan based on progress and any new evidence gathered. An Annex is available separately which provides a more detailed account of new evidence and information gathered.

### LEGISLATION

3. The **general duty** requires that in carrying out its functions CNPA pays due regard to the need to:
  - a) Eliminate unlawful discrimination and harassment
  - b) Promote equality of opportunity and
  - c) Promote good relations between persons of different racial groups.
4. The **specific duties** include:
  - a) The preparation and publication of a race equality scheme.
  - b) Assessing which functions are relevant to the duty (with a review of that assessment at least every three years).
  - c) Setting out arrangements for assessing and consulting on the likely impact on the promotion of race equality of proposed new policies.
  - d) Monitoring of policies for adverse impact on the promotion of race equality.
  - e) Publishing the results of assessments, consultations and monitoring.
  - f) Ensuring access to information and services.
  - g) Training staff on issues relevant to the duty.

## PROGRESS REPORT OF RES (2007-10)

### Gathering and Using Evidence

5. **Legal requirement:**

- a) To monitor (including for adverse impact) all policies and practices that are relevant to race equality.
- b) To ensure that the public has access to information and services that we provide

6. **What we said:**

- a) Gather baseline data on racial mix of area and compare with racial mix accessing employment, goods and services.
- b) Monitor and review CNPA publications showing equality of race in images.
- c) In visitor survey, obtain statistics on balance of participation from different backgrounds in different activities and address any stereotyping.
- d) Hold consultation event with Park users to identify specific barriers and ways to address them.
- e) Create feedback forms at CNPA meeting/events which capture information on racial issues / needs for BME people to participate.
- f) Continue to work with Inclusive Cairngorms to build awareness.

7. **What we have done:**

- a) Baseline data of racial mix of 4 Local Authorities obtained, but not specific to the National Park. In Scotland as a whole the average ethnic minority population is around 2% in total. The four local authorities represented in the Park are fairly consistent in having a minority ethnic population of around 0.8% each. We propose to seek more up to date data which contains more recent trends eg migrant populations.
- b) CNPA publications are monitored for images which are representative of communities using the Park, and we will continue to source new images of all equality groupings through Inclusive Cairngorms and CNPA supported events.
- c) Stats and evaluation feedback used from the Black and Minority Ethnic consultation event held in October 2007 in association with Backbone. Real and perceived barriers identified including lack of confidence, awareness of countryside, feeling of not belonging (only for white/middle classes) , fear, transport, language, cost, parental control.

- d) Evaluation report from Active Life project (follow-on project from consultation event). Addressing some of the barriers identified, eg increasing confidence, awareness of Park, health and wellbeing, changing lifestyles,
- e) Mosaic Evaluation report
- f) Joint National Parks Outreach action research project identified barriers for ethnic communities engaging with National Parks (similar to Backbone consultation). Following this, CNPA have reviewed priority groups that we support for social inclusion/outreach (BME groups considered medium priority).
- g) Stats are gathered on ethnic origin of participants on training events and LEADER grant beneficiaries.
- h) Evaluation form templates being developed for use at other public events (to capture ethnic origin of participants).

**Not achieved**

- i) Visitor Survey (May 09 – Apr 10) did not capture information on people from different ethnic backgrounds who visit the National Park.

8. A more detailed summary of new evidence is available separately.

## **Consultation and Involvement**

9. **Legal requirement:**

- a) Although there is no explicit requirement to consult in preparation of our RES, EHRC recommends we do this, as it will improve our evidence base and community involvement.

10. **What we said:**

- a) Hold consultation event with Park users to identify specific barriers and ways to address them
- b) Continue to work with Inclusive Cairngorms to build awareness of racial issues.
- c) Make contact with new groups who hold information

11. **What we have done:**

- a) Supported BME consultation event in Oct 2007, and provided funding for subsequent Active Life project to support community leaders in accessing the countryside.
- b) Maintaining relationship and ongoing consultation with intermediary organisation Backbone to explore ways to encourage participation in

National Park. (including presentation and discussion at Inclusive Cairngorms meeting in September 08).

- c) New BME contacts established through working with Backbone, eg Polish Association, Highland Muslim Association.
- d) Involving people from BME groups in development of Race Equality Scheme eg Backbone, BEMIS, Black Environment Network.
- e) Engaged with BME people at Rural Equalities conference and through Rural Equalities network (Highlands and Islands Equality Forum )
- f) Established contact with Mosaic project in other UK National Parks – providing further evidence/ feedback.
- g) IC have prioritised key areas in CNPA's Corporate Plan against all equality strands – outdoor access, visitor services and information, communities, housing and planning and Equality Schemes. (Jan 09)

## **Impact Assessment**

### **12. Legal Requirement:**

- a) To impact assess proposed policies and monitor existing policies.
- b) To show how we will publish the results of impact assessments.

### **13. What we said:**

- a) CNPA will identify and prioritise policies and procedures that may cause barriers to people from different ethnic backgrounds and amend them to prevent potential discrimination.
- b) Develop template for reviewing policies in consultation with people from BME groups / organisations and IC.
- c) IC to help with impact assessments.
- d) Evaluate guidance on completing Park for All section in Board papers.

### **14. What we have done:**

- a) 14 staff have attended EqlA training
- b) IC has helped to identify and prioritise policy areas in Corporate Plan for EqlA.
- c) EqlA process being rolled out in 2009 / 10 involving IC where necessary. 5 generic EqlAs completed by 31 Mar 2010 involving 14 staff.
- d) Mechanisms being implemented to embed equality into policy and project development, including reviewing format of Board Papers.
- e) Completed EqlAs will be published on our corporate website  
[www.cairngorms.co.uk](http://www.cairngorms.co.uk)

## Employment

### 15. Legal requirement:

- a) To undertake ethnic monitoring according to racial group of: staff in post, applications for employment, applications for training, and applications for promotion.
- b) To train staff on general and specific race duties.

### 16. What we said:

- a) Equality monitoring with regards to racial balance will be on-going at all stages of employment, eg recruitment, uptake of training.
- b) Ensure all staff are trained in racial equality awareness, through company training and induction programmes.
- c) Promote equality of opportunity and diversity in workforce through positive action, eg, staff encouraged to seek career development opportunities, job adverts will promote equality of opportunity, explore work placements within wider community.
- d) Build awareness of racial issues amongst CNPA staff through Staff Consultative Forum, staff surveys, trade unions.

### 17. What we have done:

- a) Ethnic monitoring of employment includes records of staff's ethnic origin, applications for employment, and applications for training. Applications for promotion are not relevant to CNPA. A summary of this data is provided below.
- b) Employee ethnicity demographics are higher than average demographics of 4 local authorities that make up the National Park
- c) Recruitment - Jobs are advertised in the local press and on the website, and are accessible to all. Adverts state that CNPA is an equal opportunities employer. Advert placed in Ethnic Britain Directory in 2008 and through BEMIS. Application forms include detail of ethnic origin.
- d) Staff involved in focus group to discuss race issues in development of Race Equality Schemes.
- e) Equalities issues are a standing item on the Staff Consultative Forum agenda (with staff and Union representation), and this ensures consistent awareness of equalities issues.
- f) Appraisal forms have been amended to include a section on equalities needs, with training provided for line managers to deal with any needs arising.
- g) Annual "staff details" information gathering provides further opportunity for staff to highlight any equality needs.
- h) Staff "Away Days" are held twice each year. These events are used to discuss key themes that are relevant to staff, the organisational culture, and

stakeholder relationships. All staff are invited to contribute their views and are involved on how we develop our core approaches

- i) Race Equality training for staff delivered in 2007. Further equalities training for staff and Board members scheduled in autumn 2010.
- j) Work placements have been explored, and short term placements hosted for a young person and a teacher, however due to resourcing issues, has not been a priority.

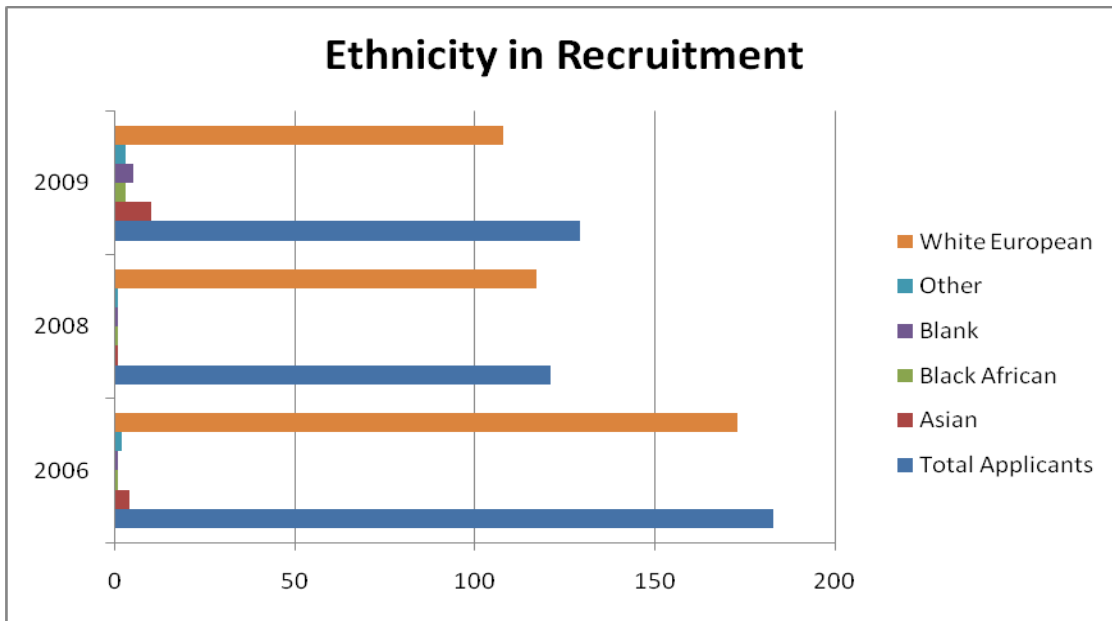
## **Ethnicity within CNPA**

### **Staff**

18. Within the organisation, there are 63 White European staff and 1 Asian staff member (1.6%)

### **Recruitment**

19. Of a total of 183 applicants for jobs in 2006, there were 173 people who were White European, 4 Asian, 2 White Other, 1 Black African, and 2 White US/AUS/NZ. One candidate did not give details of ethnicity in their application. The percentage of applicants who identified themselves as from a minority ethnic group was therefore 5.5%.
20. Of a total of 121 applicants for jobs in 2008, there were 117 people who were White European, 1 Asian, 1 White Other, and 1 Black African. One candidate did not give details of ethnicity in their application. The percentage of applicants who identified themselves as from a minority ethnic group was therefore 3.3%.
21. Of a total of 129 applicants for jobs in 2009, there were 108 people who were White European, 10 Asian, 1 Middle Eastern, 2 White US/AUS/NZ and 3 Black African. Five candidates did not give details of ethnicity in their applications. The percentage of applicants who identified themselves as from a minority ethnic group was therefore 16.3%, a considerable increase on previous years.



## Training

22. Every member of staff had attended at least one training course/conference/seminar in the period 1 April 2009 – 20 April 2010.
- 9 (13%) staff had attended only one course
  - 21 (32%) staff had attended two courses, including the 1 ethnic minority staff member who was only appointed in February 2010.
  - 8 (12%) staff attended 3 courses
  - 13 (20%) staff attended 4 courses
  - 6 (9%) staff attended 5 courses
  - 7 (11%) staff attended 6 or more courses
23. Training opportunities are identified during the appraisal process. These courses are then sourced by a dedicated officer. Additional training opportunities are advertised to all staff equally through the Intranet. In addition, some staff source additional courses themselves, and these are always approved, provided they link to the individual's line of work and/or career development. These statistics indicate that training opportunities are presented and taken up pretty equally across the organisation.

## Action Planning and Delivery

24. **Legal requirement**
- The Race Equality Scheme should be a timetabled and realistic plan for meeting both the specific and general duties.

**25. What we said:**

- a) Specific actions set out in our RES Action Plan (not already referred to in the previous sections) include:
  - i. Raising awareness and understanding of racial equality amongst Park service providers, and demonstrate good practice in meeting the needs of user groups. Eg through training and applications for NP brand.
  - ii. Raising awareness amongst Park users of the needs of different racial groups.

**26. What we have done:**

- a) Action Plan is included in our RES 2007-10 and annual updates published in June 08 and June 09.

Key actions and outcomes **not already referred to** in previous sections include:

- a) Equality and Diversity awareness training for Park service providers held in June 2009. Poor uptake so plan to run this again.
- b) Currently discussing with Brand Management Group how promoting equality good practice can be encouraged through applications to use the CNP brand.
- c) We and Inclusive Cairngorms found it difficult to identify what is required to raise awareness between groups. Until we know who, ie which BME groups, are visiting the Park, then it is difficult to provide the relevant information. Data of racial mix of visitors is therefore required to take this action further.
- d) Influencing other organisations in relation to equality good practice. Collaboration with SEARS partners eg SNH and Loch Lomond and Trossachs NPA to deliver actions collectively, member of NDPB Equality Forum

## **Publishing, Reporting and Reviewing**

**27. Legal requirement:**

- a) To publish our Race Equality Scheme, the results of impact assessments (including consultation), monitoring information and, on an annual basis, our employment monitoring results.

**28. What we have done:**

- a) Published RES in November 2007 on CNPA website
- b) Provided annual updates on RES and Action Plan in June 08 and June 09 as part of Joint Equality Scheme

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| <p>c) Established internal 'Park for All' Group which meets quarterly to oversee development of our equalities work including our Equality Schemes and monitoring of EqlAs.</p> |
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**To do**

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| <p>a) Publishing of EqlAs, employment monitoring results</p> |
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## **REFOCUSING PRIORITIES FOR PROMOTING RACE EQUALITY**

29. Reviewing our Race Equality Scheme provides an opportunity to refocus our priorities to ensure we are tackling the most relevant and significant issues to bring about race equality. In doing this, we must consider what we have achieved to date and focus where more work is required, while also considering any evidence and the views of staff and people from different ethnic backgrounds.
30. Importantly, the new RES should also reflect CNPA's business, i.e. the Corporate Plan and Operational Plan, focussing on the key policy areas identified by Inclusive Cairngorms:
- a) **Outdoor Access**, including core paths, health walks and transport
  - b) **Visitor services** including publications, interpretation, information, rangers
  - c) **Communities** including community engagement (events, meetings, training, venues)
  - d) **Housing and Planning** including Local Plan
  - e) **Equality Schemes**, including corporate and HR policies – recruitment, staff development and training, accommodation
31. The following Action Plan includes feedback from the Draft RES Review, which was consulted with staff and Inclusive Cairngorms during April 2010. It also includes some actions which are carried forward from CNPA's RES 2007-10.

**Elsbeth Grant  
Kate Christie  
June 2010**

**CNPA RACE EQUALITY SCHEME: ACTION PLAN**  
June 2010

**Aim 1 – To Eliminate Unlawful Discrimination:**

Outcome	Action	Timescale	Accountable
<p><b>Objective 1</b> Ensure that CNPA policies do not allow direct or indirect racial discrimination, harassment and victimisation.</p>	<ol style="list-style-type: none"> <li>1. Equality Impact Assessments of new policies being rolled out following completion of generic EqlAs, and publication of results.</li> <li>2. Embedding equality into other CNPA processes and procedures eg Board papers, applications to grants programme, grants to 3<sup>rd</sup> parties, procurement, programme and project management guidance.</li> </ol>	<p>June 2010 ongoing</p> <p>Mar 2011</p>	<p>Social Inclusion officer / HR Manager</p> <p>Social Inclusion officer, Programme Managers</p>
<p><b>Objective 2</b> Ensure CNPA staff and Board are aware of and understand racial equality; how their work impacts on equality and what their own responsibilities are in terms of promoting equality within the CNPA.</p>	<ol style="list-style-type: none"> <li>1. Build equality awareness into company training and induction programmes so that all staff attend equality training covering all equality strands on a rolling 3 year programme, building on previous training and utilising skills and knowledge of staff (covering issues re HR and visitors to Park).</li> <li>2. Ensure that all staff understand equality and diversity good practice and how to identify particular racial equality issues. Raise awareness of direct and indirect discrimination, harassment and victimisation and what to do should they witness them,</li> <li>3. All senior managers to undergo recruitment training.</li> <li>4. Ensure clear guidelines for the reporting and management of any discriminatory practice, and make clear that discrimination will not be tolerated and will be dealt with.</li> </ol>	<p>1,2 Equalities training will be delivered to staff and Board in Autumn 2010</p> <p>3 Autumn/winter 2010/2011.</p>	<p>HR Manager</p> <p>HR Manager</p> <p>HR Manager</p> <p>HR Manager</p>

**Aim 2 – To Promote Equality of Opportunity.**

<b>Outcome</b>	<b>Action</b>	<b>Timescale</b>	<b>Accountable</b>
<p><b>Objective 1</b> Ensure equality of opportunity for CNPA staff and general public in accessing training opportunities / events</p>	<ol style="list-style-type: none"> <li>1. Continue to gather and monitor baseline data on racial mix of area (including migrant population) and compare with racial mix accessing employment, goods and services, eg through 2011 census, Local Authority stats</li> <li>2. Continue to audit training provision and uptake of training opportunities for racial equality.</li> </ol>	<p>Ongoing 2011</p> <p>Ongoing</p>	<p>HR Manager</p> <p>HR Manager (Internal trg) Training Project Manager (External training)</p>
<p><b>Objective 2</b> Ensure all staff are equally encouraged to take up training and career development opportunities.</p>	<ol style="list-style-type: none"> <li>1. Explore new ways to provide information about training and career development opportunities to all across the organisation.</li> <li>2. Use findings from monitoring to inform actions</li> <li>3. Publish employment monitoring results</li> </ol>	<p>September 2010 ongoing</p> <p>Ongoing</p>	<p>HR Manager</p> <p>HR Manager and other managers</p>
<p><b>Objective 3</b> To promote a good racial balance throughout all levels of the organisation, taking positive action where necessary</p>	<ol style="list-style-type: none"> <li>1. Job advertisements at all levels promote equality of opportunity</li> <li>2. Continue to advertise through BEMIS</li> <li>3. Staff at all levels encouraged to seek career development opportunities equally through the appraisal system, with information on career paths available.</li> </ol>	<p>Ongoing</p> <p>annually ongoing</p>	<p>HR Manager</p> <p>All line managers through Appraisals HR Manager</p>
<p><b>Objective 4</b> Ensure that the equalities needs of delegates of meetings/training courses delivered by the CNPA are fully met.</p>	<ol style="list-style-type: none"> <li>1. Update and ‘relaunch’ internal guidance on organising meetings/courses to ensure race equality</li> <li>2. Produce updated guidance on auditing meeting venues to ensure they are fully accessible and inclusive</li> <li>3. Ensure staff include equalities clauses in all invitations to training courses/meetings</li> </ol>	<p>Autumn 2010 and ongoing</p>	<p>Social Inclusion officer</p>

**Cairngorms National Park Authority Race Equality Scheme  
3 Year Review and Action Plan June 2010**

<p><b>Objective 5</b> Ensure Park service providers and residents are well informed on the needs of BME groups.</p>	<ol style="list-style-type: none"> <li>1. Provide Park for All (equalities) training for Park service providers that will raise their awareness of equalities issues, and help improve their service to BME groups</li> <li>2. Support Community introductions project (Backbone) to introduce BME groups to Park service providers (incl Park Ranger services)</li> </ol>	<p>November 2010</p>	<p>Training Project Manager</p> <p>Social Inclusion Officer, Visitor Services Officer</p>
<p><b>Objective 6</b> People from different ethnic backgrounds will be aware of the National Park and how to engage with it.</p>	<ol style="list-style-type: none"> <li>1. Follow recommendations from Joint NPs 'Barriers to Engagement' project to address barriers for BME (Black and Minority Ethnic) groups by:</li> <li>2. Working with BME intermediary groups (eg Backbone) to identify and develop support packages to help them engage with the Park.</li> <li>3. Providing advice and signposting for BME groups who wish to engage with the Park. Visitor information / leaflets will be produced in Plain English and using images which are inclusive and representative of the target audience.</li> </ol>	<p>June 2010 ongoing</p>	<p>Social Inclusion officer Outdoor Learning Officer</p> <p>Communications Officer</p>

**Aim 3 – Promote good relations between persons of different racial groups.**

<b>Outcome</b>	<b>Action</b>	<b>Timescale</b>	<b>Accountable</b>
<p><b>Objective 1</b> CNPA staff and Board to be able to positively influence Park Service Providers in relation to race equality.</p>	1. Provide Equalities training to Park Service providers to market the business case for promoting equality and diversity (inc issues re language and race).	December 2010	Training Project manager
	2. Discuss with Brand Management Group the options for including diversity / equalities criteria in Park brand applications, eg training in equalities awareness.	August 2010	Sustainable Tourism Officer
	3. Work with Park Ranger Services to identify ways to make ranger services more accessible to BME groups	Mar 2011	Senior Visitor Services Officer
	4. Produce Park for All assessments ie generic checklists that businesses can use to assess and improve the accessibility of their services	October 2010	Social Inclusion officer
<p><b>Objective 2</b> CNPA will produce materials showing images which are representative of the relevant communities using the Park to promote equal access to services and facilities.</p>	1. Monitor and review CNPA publications showing equality of race in images. 2. Source images which are representative of the relevant communities using the Park – through Inclusive Cairngorms, events supported by CNPA and explore use of websites. 3. Identify ways to gather information on racial mix of visitors to the National Park (eg through Park Service providers)	June 2010 ongoing  Ongoing  Mar 2011	Communications Officer  Social Inclusion officer, Grants programme Manager

**Aim 4 – To Build Awareness of Specific Barriers to Full Inclusion of different racial groups**

<b>Outcome</b>	<b>Action</b>	<b>Timescale</b>	<b>Accountable</b>
<p><b>Objective 1</b> Continue to build awareness of any racial issues amongst CNPA staff</p>	<ol style="list-style-type: none"> <li>1. Equalities is an agenda point on all staff consultative forum meetings</li> <li>2. Hold regular staff surveys/face-to-face focus group meetings</li> <li>3. Consult with staff and trade unions</li> <li>4. Collate information from complaints procedure</li> <li>5. Analyse findings eg if not achieving a representative racial mix, investigate possible causes and take action</li> <li>6. Feed back learning into future RES Action Plans</li> </ol>	<p>ongoing Ongoing</p> <p>quarterly Annually</p> <p>2010</p>	<p>HR Manager</p> <p>HR Manager Head of Corporate Services</p> <p>Education and Inclusion Manager and HR Manager</p>
<p><b>Objective 2</b> Continue to build awareness of any racial issues amongst CNPA Park Users</p>	<ol style="list-style-type: none"> <li>1. Continue to monitor evaluations from Backbone events and consider ways to address barriers.</li> <li>2. Use and monitor feedback forms at CNPA meetings / events that ask pertinent questions about equalities issues to improve our engagement with BME groups (part of Aim 2 Objective 4)</li> <li>3. Continue to work with Inclusive Cairngorms</li> <li>4. Make contact with new groups who hold information eg through Backbone events</li> </ol>	<p>June 2010 ongoing</p> <p>Autumn 2010 ongoing</p> <p>Ongoing June 2010 ongoing</p>	<p>Social Inclusion officer</p>