

CORPORATE

Business Plan

2015/16

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Foreword



From the Chair

Equality and human rights are rarely out of the news, but over the past year the spotlight has been particularly strong. The 800th birthday of our own Magna Carta, debates about freedom of expression in the wake of tragic events in Paris and Denmark and political discussions leading up to the forthcoming General Election have highlighted a range of issues.

We might not always agree with what we hear and read, but it does remind us that we live in a country with a long history of upholding people's rights, encouraging tolerance and valuing diversity. Fairness, dignity, tolerance and respect are values we all share. We are never more indignant than when we see unfairness or perceive powerful institutions trampling on the rights or dignity of ordinary people. That is why we have a strong framework of laws to protect all of us from discrimination and defend our basic rights as human beings.

We at the Commission are proud of what we have done in the past year to protect and enhance this tradition. This includes a major report into the cleaning sector, aimed at helping tackle discrimination for thousands of workers; a major inquiry into deaths in detention of hundreds of adults with mental health conditions; promoting the rights of older people in care homes; one of Great Britain's biggest ever calls for evidence into religion and belief in the workplace and service delivery; new guidance on freedom of expression to dispel confusion about the law; funding or intervening in more than 30 legal cases on behalf of disadvantaged groups such as Gypsy and Traveller communities; and publishing many reports and briefings championing a broad range of equality and human rights issues.

While we should be proud of the progress that Great Britain continues to make, there is no cause for complacency. Unfairness, intolerance, injustice and indignity remain far more prevalent than we should accept in a modern civilised society.

There is evidence that:

- the gender pay gap remains unacceptably high, at nearly 16 per cent for managers, directors and senior officials and nearly 25 per cent for specific skilled trades,¹ and pay gaps that track race and disability are also a very significant issue
- there is a significant rise in prejudice and hate-motivated crime against a range of groups, including disabled people, lesbian, gay, bisexual and transgender people and people from non-Christian religions
- there is widespread concern about the impact of changes to legal aid on access to justice in Great Britain.

Our Business Plan for 2015/16 sets out a challenging but achievable plan to make progress on these and many other important issues over the next year, and to conduct our five-yearly review of progress towards equality and human rights in Great Britain. This will set the baseline for our future work as Great Britain's national equality body and National Human Rights Institution.

We are proud of our status as an A-rated National Human Rights Institution, and will be working hard this year to demonstrate the importance and impact of our work during the UN's review of our accreditation status.

We have come a long way since the Magna Carta in building a fairer and more tolerant society that provides a range of protections for the rights of individuals. But there is still much more to do before we can say we are a country that fully lives up to these aspirations and values. In 2015/16, the Commission will show neither fear nor favour in driving further progress towards greater fairness, dignity and respect for all.

Baroness Onora O'Neill

Chair of the Equality and Human Rights Commission

¹ ONS Annual Survey of Hours and Earnings, 2014 Provisional Results (published 19 November 2014). Available at: <http://www.ons.gov.uk/ons/rel/ashe/annual-survey-of-hours-and-earnings/2014-provisional-results/stb-ashe-statistical-bulletin-2014.html#tab-Gender-pay-differences>



From the Chief Executive

The coming year will be an important one for the Commission, in which we will build on the programme we are already delivering and at the same time undertake a great deal of new and fundamental agenda-setting work. Our primary focus as an organisation will be on our report to Parliament on progress towards equality and human rights in Great Britain. This analysis will answer the question, ‘Is Britain Fairer?’, and will inform the priorities for our next three-year Strategic Plan and our future work to influence government and others to make progress on the most pressing equality and human rights challenges we face. We will also engage with the UN’s review of our accreditation as a UK National Human Rights Institution and the Government’s planned post-implementation review of the Equality Act 2010, and we will be subject to a triennial review of our efficiency and effectiveness as an organisation.

Alongside this, our plan for this year focuses on three major new projects – examining pay gaps, access to civil justice, and the relationship between attitudes, values and behaviours – which offer us the opportunity to shape more effective strategies for addressing structural equality and human rights issues over the coming period. It also sets out a range of other projects which will drive well-defined and practical improvements in the promotion of equality and the realisation of rights. We will build on our work to reduce deaths of adults with mental health conditions in State detention, to improve diversity in boards of FTSE 350 companies, and to examine experiences relating to religion or belief in the workplace and service delivery, and we will review progress towards implementing the recommendations of our inquiry into disability-related harassment. We will also continue our activities as a National Human Rights Institution, including monitoring and reporting the UK’s progress in meeting its commitments under United Nations human rights treaties, and scrutinising proposed legislation for its implications both for equality and for human rights.

The coming year will be characterised by a degree of uncertainty for us, in common with other public bodies. We will need to assess and react to the implications of a new Government and Spending Review, and likely changes to the constitutional settlement on devolution. As an organisation we are up to the challenges and demands of the

next 12 months. We will continue to build on our success, and aim to become an exemplary modern public service organisation, delivering against our remit effectively and efficiently to ensure that equality and human rights are for everyone.

Mark Hammond

Chief Executive of the Equality and Human Rights Commission

About the Commission

Our strategic vision

We live in a country with a long history of upholding people's rights, valuing diversity and challenging intolerance. The Commission seeks to maintain and strengthen this heritage while identifying and tackling areas where there is still unfair discrimination or where human rights are not being respected.

Our role

The Equality and Human Rights Commission (the Commission) was established by Parliament under the Equality Act 2006 to help safeguard and enforce the laws that protect all our rights to fairness, dignity and respect. We contribute to making and keeping Great Britain a fair society in which everyone, regardless of background, has an equal opportunity to fulfil their potential.

The Commission is an independent non-partisan body that uses its powers to support and promote laws and practices that help make our society fair for everyone. Our aim is to be a trustworthy and authoritative organisation, which is reputed as a centre of excellence for data, evidence and legal expertise and an essential point of contact for policymakers across Great Britain needing advice on equality and human rights. While we want to work with organisations and individuals to advance the cause of fairness, dignity, tolerance and respect, we are ready to take tough action against those who break the law.

As a UN-accredited National Human Rights Institution and national equality body, we work with bodies in Scotland and Northern Ireland, across Europe and internationally to protect and promote equality and human rights.

Strategic priorities and progress

Our strategic priorities

Our current Strategic Plan was published in March 2015. It brought forward the strategic priorities that we set out in 2012 – priorities that remain relevant today and continue to underpin our work this year. These are to:

- promote fairness and equality of opportunity in Great Britain's future economy
- promote fair access to public services, and autonomy and dignity in service delivery
- promote dignity and respect, and contribute to keeping people safe.

Delivery highlights in 2014/15

Over the past year we have continued to build the reputation and confidence of our organisation delivering high-impact work that has had a positive impact on people's lives. Here we highlight just some of our successes.

To promote fairness and equality of opportunity in Great Britain's future economy, we:

- Published 'The Invisible Workforce', our assessment of compliance with equality and human rights law in **employment practices in the cleaning sector**. This highlighted concerns about potentially unsafe working environments, unlawful discrimination, under- and non-payment of wages, and harassment and bullying. A multi-stakeholder cleaning sector taskforce is now working with us on improving practice and compliance with the law; encouraging more responsible procurement; treating workers with dignity and respect, and raising awareness of employment obligations.
- Began the first comprehensive study for nine years on the scale and nature of **pregnancy and maternity discrimination** and disadvantage in the workplace, conducted jointly with the Department for Business, Innovation & Skills (BIS).

- Published authoritative guidance on the legal framework for steps that can lawfully be taken to increase the number of **women on the boards of organisations**. We collected evidence for our inquiry into the recruitment and appointment of directors to the boards of FTSE 350 companies.
- Published the results of our call for evidence on experiences at work and service provision relating to **religion or belief**.
- Launched an **investigation** into the policies and processes used by the Metropolitan Police Service to deal with complaints about unlawful discrimination and victimisation of police personnel.
- Successfully influenced the Wood Commission report on Developing Scotland's Young Workforce and delivered a high-impact report on low levels of access and uptake of **modern apprenticeships in Scotland** by young people from ethnic minorities and young disabled people, and on gender segregation in choice of apprenticeship.
- Contributed to improving **Welsh workplaces** by sharing effective practice through the Equality Exchange Network and engaging directly with key employers such as Airbus Defence and Space, and Legal & General.

To promote fair access to public services, and autonomy and dignity in service delivery, we:

- Launched a two-year **Sports Inclusion Programme**, committing £600,000 to increase the participation of women, girls and people from ethnic minorities in rugby, through Premiership Rugby Limited. Our funding will support the recruitment of 480 female teachers and volunteers, and the delivery of five-week rugby training programmes – 156 for girls and 130 for children from ethnic minority backgrounds. We also agreed an action plan with Boxing Scotland to ensure appropriate development opportunities are in place for women boxers.
- Wrote to **letting agents** reminding them of their obligations not to discriminate unlawfully against potential tenants. The Property Ombudsman has fined one of the agencies, which has now agreed to work with the Ombudsman to remove discriminatory practice.
- Intervened in a judicial review in which the High Court declared the new residence criterion for **eligibility for council tax reduction** to be indirectly discriminatory and in breach of the Public Sector Equality Duty.
- Reported on progress following our formal assessment of compliance with the equality duties in the **Spending Review** 2010; and published a report by the

National Institute of Economic and Social Research and Landman Economics on the development of a method for modelling the **cumulative impact** of government spending and fiscal decisions.

- Published a passport-sized leaflet to advise **disabled passengers** of their rights when travelling by air. This is being distributed through airports, travel companies and organisations working with disabled people.
- Ensured the new **Special Educational Needs and Disabilities Code** for schools reflects the requirement to make reasonable adjustments to secure equal access to education for disabled children.
- Published new guidance on the Public Sector Equality Duty (PSED) and data collection for English public authorities, in partnership with the Information Commissioner for England. We also published PSED monitoring reports and an independent review of the **PSED in Wales**, which assesses progress in relation to the requirements of the duty, highlights successful outcomes, and identifies barriers to implementation, and provided targeted support to 45 **public authorities in Scotland** to improve the quality of their published equality outcomes, which form part of the specific equality duties in Scotland.
- Started a two-year programme to improve compliance with **equality and human rights obligations in health and social care**, developing an online compendium of resources for the sector and working with the CQC Academy to embed equality and human rights across its curriculum. We also entered into a formal agreement with a Scottish NHS Board to ensure **equal access to their services for Deaf patients**, through the proper provision of British Sign Language interpreters.
- Helped secure better access to halting sites for **Gypsies and Travellers** in Scotland, including publishing research into good practice in establishing site provision.

To promote dignity and respect, and contribute to keeping people safe, we:

- Entered into a formal agreement with one public authority and continued work with two other authorities to improve their approach to **disability harassment**.
- Completed our **inquiry into non-natural deaths of adults with diagnosed mental health conditions in State detention**, which found failures by institutions to learn lessons and implement recommendations. We launched an easy-to-use Human Rights Framework setting out 12 practical steps for policy-makers and frontline staff in prisons, secure hospitals and police services to help protect lives.

- Commenced our project to make sure people who experience **lesbian, gay, bisexual and transgender hate crime** have better opportunities to report it.
- Embedded expertise and learning about good practice to address disproportionate and invasive use of **stop and search police powers** in England, through a partnership training programme with the National College of Policing.
- Responded to concerns about offensive electoral campaigning based on prejudice against people who share particular protected characteristics by working with the Electoral Commission to deliver up to date guidance on **electoral conduct**. The aim of the guidance is to improve understanding of the legal framework among local authorities and other public authorities involved in elections, as well as to inform the general public.
- Took steps to address negative stereotypical comments about **Gypsies and Travellers**.
- Intervened in a judicial review to highlight flaws in the system for including **vulnerable asylum seekers** in the Detained Fast Track Process. The High Court found that there was an 'unacceptably high risk of unfairness', and the Home Office will have to amend the procedures to include better screening out of vulnerable applicants and earlier access to lawyers.
- Argued in a Supreme Court appeal that the storage and disclosure of a police warning for bicycle theft given to a prospective teacher when he was 11 breached the **Article 8 right to privacy**. The Supreme Court confirmed that the Criminal Records Bureau scheme set up under the Police Act 1997 was not compatible with human rights.

In addition, we:

- Published reports on **human rights treaties** covering the rights of the child, torture, disabled people, civil and political rights, and on the Universal Periodic Review – influencing the recommendations that the United Nations committees make to Government towards the realisation of human rights in the UK.
- Supported or intervened in **landmark cases** on issues affecting some of the most disadvantaged in our society and on breaches of human rights, achieving a 69 per cent success rate.
- Delivered **resources for parliamentarians**, women's rights organisations and for children and young people, on the United Nations Convention on the Elimination

of all forms of Discrimination Against Women, and the United Nations Convention on the Rights of the Child.

- **Advised the UK Parliament** on equality and human rights issues by providing briefings on the Care Bill, the Criminal Justice and Courts Bill, the Deregulation Bill, the Modern Slavery Bill, the Immigration Bill, the Counter-Terrorism and Security Bill and the Armed Forces (Service Complaints and Financial Assistance) Bill.
- Helped inform the policies of Governments and public authorities by submitting **responses to consultations** including changes to planning policy for Gypsy and Traveller sites, the review of the Regulation of Investigatory Powers Act, the integration of health and social care in Scotland, and the Independent Police Complaints Commission consultation on post-incident management.
- Launched our new **strategic litigation policy** to ensure that our resources are deployed to maximum impact, following consultation with the advice sector and others to harness their experience and perspectives in determining priorities.
- Selected and appointed a new panel of counsel covering England, Wales and Scotland, following a successful competitive exercise. Members of the panel are the Commission's preferred providers of external legal services, including representation and advice.
- Launched an up-to date and more user-friendly **website** with new social media functionality.
- Continued to strengthen financial controls and reporting, demonstrated through our fourth consecutive **clean audit opinion** from the National Audit Office, and to drive further **efficiency savings** through the implementation of our estates strategy; in all we have delivered £3m in savings under this heading in the last two years.

Work programme for 2015/16

Below we set out the approach we will take in 2015/16 to deliver on our strategic priorities, and in relation to our core functions. Some aspects of this work are subject to approval by the Minister for Women and Equalities, since they would need funding from our discretionary programme budget. As well as continuing work that was developed last year, we will initiate new projects on:

Fairness and equality of opportunity in the economy

Identifying strategies to address specific factors contributing to pay gaps

Fair access, autonomy and dignity in public services

Examining the state of access to civil justice and the availability of advice and assistance on equality and human rights issues

Dignity, respect and safety:

Assessing the relationship between attitudes, values and behaviours, to identify levers that can prevent and respond to unlawful discrimination, harassment and identity-based violence

Central to our Business Plan this year is fundamental work to shape our future plans, including our five-year review of progress towards equality and human rights: *Is Britain Fairer?*, which will inform our Strategic Plan for 2016-19. At the same time, we will need to assess and respond to changes in the context for our work following the General Election in May, as well as proposals for further devolution in Scotland and in Wales. We are aware that there may be implications for our budget, for our 'sponsor' relationship with a government department, and possibly for the legislative and constitutional framework that bears on our work. These developments will require us to devote significant levels of resource to respond effectively to uncertainty and change, while laying the groundwork for the longer term through strategic analysis and planning.

Strategic Priority 1

To promote fairness and equality of opportunity in Great Britain's future economy

Inequalities in the labour market can stem from unequal opportunities to access employment; discriminatory treatment in the workplace, and barriers to progression. Promoting fairness and equality of opportunity in the labour market requires tackling all these factors. Failing to provide opportunities for everyone to contribute to the best of their ability means businesses miss out on talent – this will hold our economy back.

Our work programme in support of Strategic Priority 1 focuses on:

- promoting fair access to employment for all
- ensuring fair treatment of workers
- tackling under-representation at senior levels.

Key project

In 2015/16 we will launch a major new project to **address pay gaps in relation to gender, race and disability**. Drawing on existing research, we will set out our analysis of the factors contributing to pay gaps, sectors where unequal pay is a particular problem, and the effectiveness of existing interventions. This work will provide the basis for developing a strategic approach to tackling pay gaps in future. We will also improve the guidance we provide for employers on equal pay to ensure that it is well-understood and implemented.

This year, we will also take forward work to:

1.1 Promote fair access to employment for all, by:

1.1.1 Tackling unlawful discrimination in recruitment practices which exclude some groups of workers. The focus of this work is recruitment practices that discriminate on the basis of nationality. New guidance will set out what the Equality Act means for advertisers and publishers of job adverts, and how individuals can make enquiries about potentially discriminatory adverts. We will gather relevant evidence before developing further proposals to improve compliance with the law in this area.

1.1.2 Supporting the television broadcasting industry to increase diversity on- and off-screen through tailored guidance on lawful steps to address under-representation of people with protected characteristics in employment, commissioning and programme-making. As well as tackling barriers to participation in the industry, this work should contribute to broadcasting which more accurately represents the diversity of Great Britain.

1.2 Ensure fair treatment of workers, by:

1.2.1 Improving women's awareness of their rights in relation to pregnancy and maternity and improving employers' compliance with their responsibilities. We will publish the initial findings of our research on the scale and impact of pregnancy and maternity discrimination and disadvantage in the workplace, and employer practice and attitudes, followed by our final report later in the year. In light of this evidence we will develop and deliver targeted resources and activities, including guidance, case studies and a toolkit for businesses, to help employers manage these issues positively, and to improve women's understanding of their rights regarding pregnancy and maternity at work.

1.2.2 Investigating policies and procedures used to address complaints of unlawful discrimination and victimisation of police personnel by the Metropolitan Police Service (MPS). Using our formal investigation powers we will consider whether there have been unlawful acts in the treatment of complaints of sex, race or sexual orientation discrimination. This will include consideration of factors such as the timeliness, fairness and transparency of the procedures, and whether the steps subsequently taken by MPS have reduced or eliminated the risk of unlawful acts and omissions occurring.

1.2.3 Supporting employers to understand their responsibilities in relation to religion or belief in the workplace, and assessing the effectiveness and adequacy of current legislation. In light of the call for evidence we completed last year, we will produce guidance for employers and service providers on how to meet the requirements of the law and demonstrate good practice, publish a technical report on the effectiveness of the legal framework, and make recommendations to Government.

1.2.4 Improving compliance with equality and human rights laws in employment practices in the cleaning sector. Following our inquiry report, 'The Invisible Workforce', we have established a taskforce with businesses and other key actors in the cleaning sector to identify cost-effective, practical solutions to improve working conditions for cleaners. We will work with the taskforce to secure action on responsible procurement, dignity and respect, and awareness of employment obligations and workers' rights.

1.2.5 Supporting businesses to respect human rights. We will help businesses to apply the UN guiding principles on business and human rights, and to improve transparency in relation to their human rights policy and performance. Our work will focus on three areas: high-level briefings for board members and investors, toolkits to help specific sectors identify human rights issues relevant to their business operations, and guidance on operational level grievance mechanisms.

1.2.6 Helping small and medium-sized enterprises (SMEs) make better use of talent. We will publish research examining SMEs' views on recruitment and employment. We will share these findings with organisations that provide employment advice to SMEs and explore how to respond better to the needs identified by the sector in relation to employing a diverse and skilled workforce.

1.3 Tackle under-representation at senior levels, by:

1.3.1 Improving recruitment practice in FTSE 350 companies to promote diversity on FTSE boards. Following evidence gathering and publication of our guidance last year, we will report our findings on diversity on FTSE 350 boards, and promote fair recruitment practices that secure appointments based on merit.

Strategic Priority 2

To promote fair access to public services, and autonomy and dignity in service delivery

Fair access to key services is a prerequisite to meeting the basic needs which enable people to live safe, productive and fulfilling lives and participate fully in society and the economy. This means ensuring that key services are accessible to all; that people are treated fairly as required by the law; and that fundamental public services focus on meeting specific needs and addressing the experiences of the most disadvantaged, so that everyone can maximise their life chances.

Our work programme in support of Strategic Priority 2 focuses on:

- ensuring services treat everyone fairly
- maximising the potential for key public services to close equality gaps and protect human rights
- providing tools to help public bodies.

Key project

In 2015/16 we will launch a major new project to **examine the state of access to civil justice**. We will explore how recent changes to legal aid, tribunal fees and the funding of the advice sector have affected the right to a fair trial and access to civil justice for people sharing particular protected characteristics. This work will also assess the availability of sufficient good quality advice and redress on equality and human rights issues.

This year, we will also take forward work to:

2.1 Ensure services treat everyone fairly, by:

2.1.1 Increasing participation of under-represented groups in sport.

Through our two-year programme to increase the participation of women and girls, people from ethnic minorities and disabled people with different types of impairments in sports, we are working with football, rugby and cricket governing bodies to deliver a range of projects to ensure teams and spectators represent their communities; improve the physical and cultural accessibility of sporting venues; and

increase take up of the Sports Equality Standard. We will encourage sports bodies to implement lessons learned from the 2012 London Olympic and Paralympic Games and the 2014 Glasgow Commonwealth Games to make sport more accessible for spectators; and provide support to sports bodies aiming to achieve the Intermediate or Advanced Equality Standard. We will work with Sport Scotland to ensure that equality is embedded in all its programmes and investments, with the aim of increasing participation and opportunities for people currently under-represented in sport.

2.1.2 Transferring our expertise and learning to reduce the inappropriate use of police stop and search powers. We will continue our two-year joint project with the College of Policing on training to help improve encounters between the police and the public. This will build capacity among police services to meet their human rights obligations and address potentially discriminatory behaviour. We will continue work with Police Scotland to ensure they effectively assess the impact of their stop and search programme on people with particular protected characteristics.

2.1.3 Tackling discrimination and disadvantage experienced by Gypsy, Traveller and Roma communities. We will deliver a range of interventions to address issues of prejudice and discrimination facing travelling families when accessing private and public sector services, including insurance and education, and when portrayed in the media and advertising.

2.2 Maximise the potential for key public services to close equality gaps and protect human rights, by:

2.2.1 Supporting initiatives to achieve greater equality in education. We will support work being undertaken within the Further and Higher Education sectors in England to provide guidance to institutions on their strategies to meet their ambitions on equality.

2.2.2 Raising levels of compliance with equality and human rights standards in health and social care. Our work on health and social care will be shaped around three objectives: to ensure services are accessible to all, focusing on those who may face particular barriers such as older people; to ensure services meet the specific needs of people who share particular protected characteristics, such as

transgender people and people of different ethnic origins; and to improve diversity in the leadership of the NHS. We will pursue these objectives through partnerships with national organisations in the health and social care sector in England, including our ongoing project with the Care Quality Commission Academy to ensure their training programmes address equality and human rights; and supporting frontline health and social care service providers and commissioners to adopt human rights based approaches in all types of health and social care. We will review our objectives for this work in the light of our *Is Britain Fairer?* report.

2.2.3 Promoting equality and fair financial decision-making in Spending Reviews. During the last few years the Commission has influenced the work of HM Treasury and key central government departments to improve the way that equality considerations are taken into account in financial decision-making. This year we will maintain a watching brief on the work by the Treasury to continue these improvements, particularly in relation to decisions made in the 2015 Spending Review. We will continue our work with the Equality Budget Advisory Group which advises the Scottish Government on placing equality at the centre of budget decisions.

2.3 Provide tools to help public bodies, by:

2.3.1 Helping public authorities meet the Public Sector Equality Duty. We will continue to build our evidence base on the effectiveness of the PSED, and explore how to make our guidance to public bodies as useful as possible, alongside well-targeted and proportionate regulatory activity to improve public sector employment practice and service delivery across Great Britain through improved compliance. We will assess the progress being made by the 259 public bodies subject to the Scottish specific duties towards achieving their equality outcomes, and the extent of progress made by Scottish Ministers in meeting the Scottish Ministers' Specific Duty.

2.3.2 Supporting schools to increase participation and attainment. We will fund online resources for schools on supporting disabled pupils and those with special educational needs.

2.3.3 Collaborating with non-economic regulators, inspectorates and ombudsmen. We will continue to work with these organisations to

support them to embed equality and human rights in their regulatory frameworks, share good practice and improve the effectiveness of their staff training, in order to help them fulfil their role in ensuring public services comply with equality and human rights standards.

Strategic Priority 3

To promote dignity and respect, and contribute to keeping people safe

The State has an obligation to safeguard the public and to ensure equal access to fundamental rights. While Great Britain has made much progress towards becoming an inclusive place where diversity is valued, people are still being subjected to abuse, bullying and even violence because of who they are, and there is evidence that more needs to be done to protect the safety of people in the most vulnerable positions in our society.

Our work programme in support of Strategic Priority 3 focuses on:

- tackling prejudice and reducing identity-based violence
- safeguarding those least able to assert their own rights.

Key project

In 2015/16 we will launch a major new two-year project to **assess the relationship between attitudes, values and behaviours**. In the first year, we will develop an overview of current insights on prejudiced attitudes towards groups sharing particular protected characteristics, and examine how attitudes and values relate to unlawful discrimination, harassment and identity-based violence. Our aim is to understand how attitudes and values influence behaviours, and how far regulating behaviour can engender changes in attitudes, to inform our future approach to developing and influencing interventions that will be effective in preventing and responding to unlawful discrimination, harassment and identity-based violence.

This year, we will also take forward work to:

3.1 Tackle prejudice and reduce identity-based violence, by:

3.1.1 Reducing the incidence of identity-based bullying and harassment in schools. We will develop our work on the nature and incidence of prejudice-based bullying and harassment in secondary schools, including building on our work in Scotland over the last 12 months to understand and respond to the extent of this issue. We will explore how to improve schools' responses to this type of behaviour, including improving the collation and publication of data and encouraging better reporting.

3.1.2 Improving the reporting of lesbian, gay, bisexual and transgender (LGB and T) hate crime. In 2014/15 we launched a two-year project to encourage greater reporting of LGB and T hate crimes and improve understanding of the issues among agencies, working with LGB and T organisations, Governments and criminal justice agencies across Great Britain. LGB and T hate crime statistics reported by the Association of Chief Police Officers are significantly lower than the estimated number of these crimes, and recording rates vary significantly between Forces. Our objective is to establish comprehensive local, regional and national links between LGB and T communities and criminal justice agencies which will deliver sustained improvements to prevention, reporting and responsiveness.

3.2 Safeguard those least able to assert their own rights, by:

3.2.1 Pressing for action to reduce avoidable deaths of adults with mental health conditions in State detention. Following the report from our inquiry and related work in Scotland, we will work with relevant public authorities to agree plans for improvement based on our recommendations.

3.2.2 Reducing incidents of disability-related harassment. We will report on how public authorities have responded to our earlier inquiry and Manifesto for Change, three years on, to identify what more needs to be done.

3.2.3 Fulfilling our responsibilities as an A-rated National Human Rights Institute (NHRI) and protect human rights by:

- **Developing our contributions** to the examinations of the UK or following up previous examinations, in relation to United Nations human rights treaties concerning economic, social and cultural rights (ICESCR), civil and political rights (ICCPR), children's rights (UNCRC), racial discrimination (UNCERD), discrimination against women (UNCEDAW) and the rights of disabled people (UNCRPD).
- **Raising awareness of the UK's progress** on the Universal Periodic Review (UPR) recommendations.
- **Following-up concluding observations** of the UN treaty bodies to help ensure the UK governments deliver improvements to the protection of human rights.
- **Building the capacity of civil society** to contribute to the UPR and UN treaty monitoring processes, including through training and awareness raising, improvements to our website and development of online resources.
- **Raising awareness of the UPR and UN treaties in Parliament**, including through collaborative working with the Joint Committee on Human Rights and relevant All Party Parliamentary Groups.
- **Encouraging progress towards the realisation of human rights abroad**, by submitting statements to the Human Rights Council, engaging with other NHRIs and responding to consultations from key European bodies.
- **Promoting a more positive public discourse** on human rights, raising the level of public understanding of what human rights are and working to ensure any future changes to human rights law in the UK maintains the level of human rights protection and access to redress.

The work of our Statutory Committees

The Commission has three statutory decision-making Committees: for Disability, Scotland and Wales. As well as informing the development of the Commission's Business Plan overall, these Committees also have their own work programmes.

The Disability Committee

The Disability Committee's role was reviewed in 2012/13 and in the last year we have recruited new members to guide the Committee's work and it has increased its focus on external engagement. The Disability Committee provides expert advice to the Board on disability-related aspects of all the Commission's work, for example our new project to explore the relationship between attitudes, values and behaviours, initiatives to achieve greater equality in education, and work to reduce disability-related harassment. In addition, the Committee is leading three important projects this year to protect and promote equality and human rights for disabled people:

- **Informing the UK's forthcoming examination under the UN Convention on the Rights of Disabled People**, ensuring the strategic engagement of disabled people and their organisations in the examination.
- **Delivering an engagement strategy**, designed to develop and maintain effective working partnerships with senior disability-related organisations in government, the wider public sector, business and the voluntary sector.
- **Working towards securing redress for disabled air passengers who experience discrimination** by lobbying at international level for an amendment to the Montreal Convention so that disabled people who face discrimination when travelling by air can gain an effective remedy. We will establish alliances with other equality and human rights bodies across Europe to build support and explore the possible mechanisms for securing the change we seek.

The Scotland Committee

The Scotland Committee is responsible for the Commission's work to provide information, advice and guidance and conduct research in Scotland, and for advising the Scottish Government about the effect of Scottish legislation. The Committee also advises on the impact of the Commission's wider work in Scotland, through consultation by the Commission's Board on matters affecting people in Scotland and through advice and support to the Scotland Directorate. In the coming year, the

Scotland Committee members will continue their programme of engagement around Scotland and will be:

- **Advising the Scottish Government, the Scottish Parliament and MSPs**, including informing the legislative programme and providing input to the Equality Budget Advisory Group.
- Deciding on **research** to be conducted in Scotland.
- **Leading work to transfer expertise** through interactive workshops for advisors, solicitors and voluntary sector organisations to improve their knowledge of discrimination and human rights law.
- Advising the Commission's Board on **the implications for equality and human rights in Scotland of proposals for constitutional changes**.
- Providing **advice and guidance to public bodies** in Scotland by identifying and promoting good practice on equality and human rights.

The Wales Committee

The Wales Committee is responsible for the Commission's work to provide information, advice and guidance and conduct research in Wales, and for advising the Welsh Government about the effect of legislation affecting only Wales. The Committee also advises on the impact of the Commission's wider work in Wales, through consultation by the Commission's Board on matters affecting people in Wales and through advice and support to the Wales Directorate. In the coming year, the Wales Committee will be:

- **Providing advice to the Welsh Government, National Assembly Committees, Assembly Members and others** about equality and human rights, ensuring that the Public Sector Equality Duty is rigorously applied to all areas of policy including the tackling poverty agenda.
- Providing **advice and guidance to public bodies** in Wales by identifying and promoting good practice on equality, including the Public Sector Equality Duty, and human rights through the Equality and Human Rights Exchange.
- **Increasing understanding of how human rights can improve services** across the public and voluntary sectors by following up the human rights roundtable in Wales, and working in partnership with relevant organisations.
- **Increasing access to equality and human rights advice and redress** including delivering Identifying and Tackling Discrimination in the Workplace courses in North and South Wales.

- **Developing and effectively promoting the evidence base** to inform decisions and policy making, including the setting of Strategic Equality Objectives under the Public Sector Equality Duty, across the public sector in Wales.
- Developing guidance for Welsh employers on **how to address under-representation of Muslim people in the Welsh workforce** through lawful positive action and good employment practices.

Research

In 2015/16 we will continue to develop our research function to fulfil our obligations under section 12 of the Equality Act 2006, to monitor societal progress in relation to equality and human rights. We will build our reputation as a 'Centre of Excellence' in collating complex data and producing simple, clear analysis on equality and human rights.

We will publish and lay before Parliament, *Is Britain Fairer?*, our review of progress on equality and human rights in Great Britain since 2010. This will help to identify the key challenges on equality and human rights and will inform our 2016-19 Strategic Plan.

We will undertake a programme of work to explore the relationships between attitudes, values and behaviours, and what interventions may be successful in tackling prejudiced attitudes in order to impact on unlawful behaviour.

Core legal work

In line with our new strategic litigation policy, we will continue to support or take cases or intervene in proceedings which offer the opportunity to clarify the law or prevent or address significant breaches of the Equality Act 2010 or human rights law, in particular by setting precedent or raising public interest in the issues raised. We will give particular consideration to cases which advance the objectives of our Strategic Plan and Business Plan.

We will also cover further topics in our new series of legal framework guides which set out clearly and accessibly the law on a range of equality and human rights issues, providing clarity where there is evidence of uncertainty or confusion.

Communications and engagement

Our work programme can only be delivered through collaboration and communication with a range of audiences.

Important elements of our role are to inform the public, employers and service providers about their rights and obligations under equality and human rights laws; correct inaccuracies about equality and human rights laws; and influence those we work with to embed fairness, dignity and respect in the workplace and society. In doing so, we aim to build the reputation of the Commission as an authoritative organisation that produces high quality work.

In 2014/15, we put in place a new communications strategy to make sure we do this in the most effective way possible. This included launching new digital and social media channels, successfully publicising and explaining a wide range of the Commission's work and contributing to the national debate on equality and human rights.

We made significant progress in 2014/15 and we want to build on this 2015/16. In particular, we will make further changes to improve how we use social and digital media. This includes more two-way engagement, innovating in how we provide information and content through new platforms and continuing to improve our website. This will ensure we put our audiences at the heart of everything we do.

We will continue to look for proactive opportunities to promote the Commission's work in 2015/16. Alongside communications work to deliver and support our core projects and programmes, we will look for more opportunities to engage and shape the debate on equality and human rights, fulfilling our core role as a national expert body.

Other priorities for our 2015/16 communications strategy include: new core standards for all the Commission's written publications and website content, drawing on latest thinking from the public and private sector and experts on behavioural insights including 'nudge' communications; an ongoing programme of speaking opportunities and articles to reinforce the Commission's position as an expert on equality and human rights; stepping up our work to increase public understanding and bust myths on human rights; and developing a refreshed private sector engagement strategy to support key projects. Important steps have been made to improve and professionalise the Commission's communications function and we will accelerate progress over the coming year.

We have also been making progress in our work to engage external organisations to build effective partnerships and working arrangements. The Commission works with other organisations, both on an operational basis to help deliver our Business Plan objectives, and at a strategic level to inform and promote our work. Our aim is for our engagement to be streamlined, comprehensive, cross-sector, responsive and independent.

This year we will consider the results of our recent survey of key people and organisations with an interest in our work, to inform how we improve our external engagement across Great Britain. We will also convene a strategic reference group of key cross-sector organisations to provide expert knowledge and insight, share intelligence about initiatives, events and concerns, and inform the development of our new Strategic Plan for 2016-19. In addition we will explore the possibility of establishing, in conjunction with the Government Equalities Office, a cross-government group of senior officials from departments relevant to our remit.

Working constructively with business is crucial to our success, due to the vital role private sector employers and service providers play in the economy. Following our recent review under the Regulators' Code, we will deliver improvements in the clarity of our guidance for business and ensure it is concise and easily accessible, and develop service standards explaining our approach to providing information and advice and our complaints procedures. We will continue to work with business using the successful taskforce-based approach we took in following up our inquiries into the meat processing and cleaning industries, and to develop new ways of engaging with the private sector and helping businesses to comply with the law while reducing unnecessary complexity or bureaucracy.

Responding to external developments

Safeguarding our National Human Rights Institution A status accreditation

A significant priority for the Commission in 2015/16 is to engage with the UN's review of our accreditation as a UK National Human Rights Institution. We are due to submit evidence to support our accreditation to the International Co-ordinating Committee (ICC) Sub-Committee on Accreditation in the Summer, and expect to be examined in the Autumn.

Constitutional change

In light of the Smith and the Silk Commissions, and cross-party commitments to further devolution, the Commission is alive to the prospect of adapting to new constitutional arrangements in coming years. In engaging with the national debate on devolution, our aim is to ensure that there remains a strong coherent legal and administrative framework for the protection and promotion of equality and human rights across Great Britain and clear accountability for the UK's international legal obligations.

Legal protection for human rights

We will consider the detail of any proposals to alter the legal framework protecting human rights in Great Britain, and help to inform public debate on the implications they would have. The Human Rights Act 1998 has provided essential protection to everyone in Great Britain, enabling them to access their rights in our domestic courts. It both reflects and is embedded in our constitutional arrangements. If a Bill of Rights is developed it should not water down any human rights protection contained in the Human Rights Act, but use it as a starting point to see where additional, essential protections could be brought in. These protections might include bringing into our laws other rights (such as those protected by UN treaties) or strengthening arrangements for the enforcement of current rights.

We welcome debate on such an important issue, but would not support a reversal of the leading global role Great Britain has long played in protecting and promoting human rights nor the reduction in the protections or access to remedy we all currently enjoy under the Human Rights Act.

Our organisation and resources

Budget and resource allocation

The Commission's total core funding for 2015/16 is £17.1m, comprising resource funding of £16.75m (£14.73m administration, £1.4m programme and £0.62m depreciation) and capital funding of £0.39m.

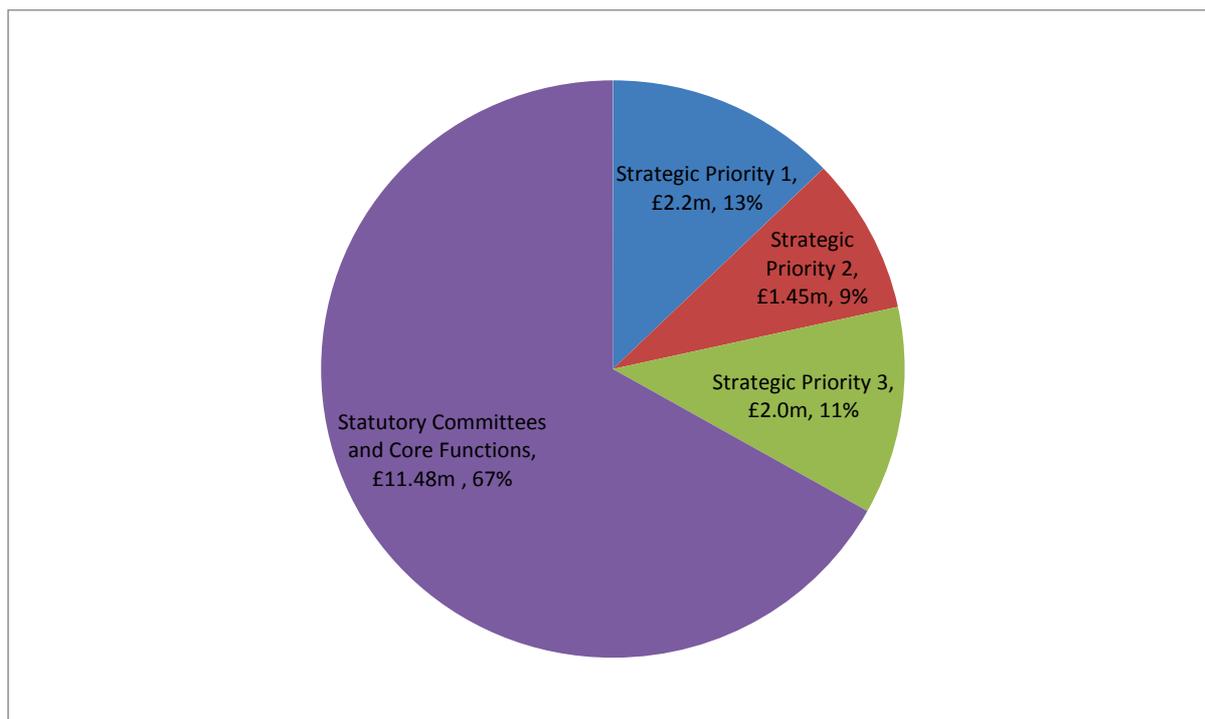
There is also provision for access to additional discretionary programme funding of £6.5m for wider equality and human rights priorities, subject to agreement of proposals by the Minister for Women and Equalities.

We will continue the reduction in our costs begun in earlier years, specifically around the continued reduction in our corporate support costs, while continuing to deliver our programme of work and services. Figure 1 below sets out the Commission's budget allocation and Figure 2 shows the resource allocation across the key areas of work.

Figure 1 | 2015/16 Equality and Human Rights Commission budget allocation

	2014/15 Forecast out-turn	2015/16 Budget
	Total £,000	Total £,000
Administration	15,027	14,727
Programme core	1,400	1,400
Depreciation	500	620
Resource	16,927	16,747
Capital	150	387
Total Resource DEL	17,077	17,134
Programme discretionary	3,864	6,493

Figure 2 | 2015/16 Resource allocation



Organisational improvement and efficiency savings

We recognise that our organisational structure needs to reflect and support effective delivery of our business priorities. With that in mind, in recent months we have restructured our Legal and Communications Directorates, and have established a new Inquiries and Investigations Teams to develop and deploy expertise in two of our important powers more effectively. Over the coming year we are planning further changes to our Senior Management Team and to our Human Resources Team.

We have delivered significant efficiency savings of £3m – or 40 per cent – on our corporate support costs over the last two years. Over the coming year we will continue to identify opportunities for further efficiency savings from our estates and corporate support functions.

We are concluding a benchmarking exercise of our corporate services functions to inform possible further efficiencies for 2015/16 onwards. We will revisit the business case for shared services for our finance and human resources transactional services to test the value for money of doing so.

We will also be investing in our IT infrastructure to provide us with a stable operating platform for the next five years.

Developing our people

We recognise that our people are crucial to our success. This means that, in order to deliver on our strategic objectives as effectively as we can, we must make sure that we are providing the right environment for our people to flourish.

At the end of 2014/15, 75 per cent of our people took part in work to identify the characteristics of an ideal organisational culture that would best support the delivery of our business objectives. We also gathered information on our current culture. Our focus for the coming year will be to close the gap between where we are and where we want to be. In the coming months we will capture the outcomes and activities that we will deliver throughout 2015/16 and beyond in a new People Strategy. This Strategy will be developed with wide engagement with both our people and our recognised Trade Unions, and is likely to focus on bringing about six key long-term outcomes:

- Strong and effective **leadership** to drive the organisation forward.
- An attractive and fair package of **reward and recognition** that allows us to attract and retain the best people.
- A strategic approach to **resourcing** that enables us to source and develop the best talent.
- Commitment to **investment in our people** to enable them to develop and grow.
- Clear and effective **communication and engagement** with our people.
- A working **environment** that is welcoming, supports effective working and which recognises and encourages the diversity of our people.

These are long-term outcomes, but we are confident that we will make significant progress towards them during 2015/16. Each of our actions has been, and will continue to be, about delivering improvements for people, delivery and governance, and will in turn enable us to develop our culture and realise our vision – to become a great place to work that delivers great work.

Governance and risk management

The Commission's Governance Framework sets out the roles and responsibilities of the Board, Committees and the Senior Management Team and our approach to good governance. The Governance Framework has recently been reviewed.

The Commission's strategy and work is overseen and directed by the Board, comprising the Chair, Deputy Chair and Commissioners. The Board is responsible for approving the Strategic Plan and the Business Plan, monitoring our performance against plans and ensuring that the Commission has appropriate systems of governance, accountability and control.

The Commission has three statutory decision-making committees (Disability, Scotland and Wales). The Board is also supported by two advisory committees – the Audit and Risk Assurance Committee and the Human Resources and Remuneration Committee.

The Senior Management Team, led by the Chief Executive, is responsible for developing and delivering the Business Plan in support of the Commission's statutory duties and strategic priorities. The Senior Management Team provides leadership, sets work priorities, monitors performance and manages risk, thereby enabling the Board to discharge its responsibilities.

Our risk management framework, policy and associated guidance provide a robust system of risk management which is embedded across all our working practices. Our strategic risk register is underpinned by operational risk registers covering key areas of work, which are reviewed monthly by the Senior Management Team and reported to the Audit and Risk Assurance Committee.

Equality objectives

Like other public bodies, the Commission must meet the requirements of the Public Sector Equality Duty. We have therefore identified and set equality objectives relating to all the work we do, our employment practices and our ways of working.

Each year we collate and analyse a range of equality information which helps us to identify and understand potential key equality issues across our functions. This is the basis on which we set our equality objectives.

The Commission is unique among public bodies subject to the Public Sector Equality Duty in that tackling discrimination, advancing equality of opportunity and fostering good relations between groups is core to our work. The objectives for our work programme for 2015/16 therefore represent our equality objectives for our work and how we work with others.

We have also identified four priority areas under which we will set specific equality objectives for our role as an employer, how we deliver services and how we procure goods and services. These are:

- ensuring our business improvements and any operational changes are implemented fairly
- fostering an accessible and inclusive working environment for all our staff
- ensuring that our services are accessible and that users' experiences and outcomes are positive
- promoting equality within our supply chain, supporting our suppliers to embed equality and diversity practices within their own organisations and working practices.

Our equality objectives for each of these priority areas are published separately in 'Our equality objectives'.

Measuring success

Performance management and reporting is central to the successful delivery of our Business Plan and ensuring that our work represents value for money. The measures against which we will judge our progress and success are set out in the separate [Success Measures Annex](#) published alongside this Business Plan.

Appendix 1 |

Our Commissioners

The Chair of the Commission is Baroness Onora O'Neill. There were some changes to the membership of the Board of Commissioners during 2014/15: Sarah Anderson CBE's term of appointment ended on 10 July 2014, and new Commissioners Susan Johnson OBE and Professor Lorna McGregor were appointed for four years from 6 January 2015.

The Board members are:

- Baroness Onora O'Neill (Chair)
- Caroline Waters OBE (Deputy Chair)
- Ann Beynon OBE (Wales Commissioner)
- Lord Chris Holmes MBE (Disability Commissioner)
- Kaliani Lyle (Scotland Commissioner)
- Evelyn Asante-Mensah OBE
- Laura Carstensen
- Susan Johnson OBE
- Professor Lorna McGregor
- Professor Swaran Singh
- Sarah Veale CBE

Mark Hammond is the Chief Executive and Commissioner ex officio. Baroness O'Neill and Mark are supported by a Senior Management Team who lead and manage delivery of our work.

Appendix 2 |

Our duties and powers

The Commission has a set of unique duties and powers under the Equality Act 2006 to help us fulfil our mandate. We have specific responsibilities and requirements under the UN Paris Principles and the European Union Equality Directives to ensure we maintain our status as a National Human Rights Institution and European national equality body.

General duty

Under the Equality Act 2006, the Commission's general duty is to exercise its functions with a view to encouraging and supporting the development of a society in which: people's ability to achieve their potential is not limited by prejudice or discrimination; there is respect for and protection of each individual's human rights; there is respect for the dignity and worth of each individual; each individual has an equal opportunity to participate in society, and there is mutual respect between groups based on understanding and valuing of diversity and on shared respect for equality and human rights.

Equality and diversity

The Commission is also under a duty to: promote understanding of the importance of equality and diversity; encourage good practice in relation to equality and diversity; promote equality of opportunity; promote awareness and understanding of rights under the Equality Act 2010; enforce the Equality Act 2010, and work towards the elimination of unlawful discrimination and harassment.

Human rights

As a National Human Rights Institution we must promote understanding of the importance of human rights through teaching, research and public awareness and educational programmes; promote awareness, understanding and protection of human rights and efforts to combat discrimination, especially through use of media channels; make recommendations to Government, Parliament and other competent bodies on existing and proposed laws and processes that will impact on human rights; promote the harmonisation of national law, policy and practice with international human rights law and standards; encourage public bodies to comply fully with the Human Rights Act 1998, which incorporates the European Convention on Human Rights into national law, and cooperate with the UN and other bodies dedicated to promoting and protecting human rights, including by monitoring and reporting on Great Britain's compliance with the core conventions.

Appendix 3 | Summary of 2015/16 work programme

Strategic Vision: We live in a country with a long history of upholding people's rights, valuing diversity and challenging intolerance. The Commission seeks to maintain and strengthen this heritage while identifying and tackling areas where there is still unfair discrimination or where human rights are not being respected.

Strategic Priority 1: To promote fairness and equality of opportunity in Great Britain's future economy	Strategic Priority 2: To promote fair access to public services, and autonomy and dignity in service delivery	Strategic Priority 3: To promote dignity and respect, and contribute to keeping people safe
<p>Key project: Addressing pay gaps in relation to gender, race and disability</p> <p>1.1: Promote fair access to employment for all, by:</p> <p>1.1.1 Tackling unlawful discrimination in recruitment practices which exclude some groups of workers.</p> <p>1.1.2 Supporting the television broadcasting industry to increase diversity.</p> <p>1.2: Ensure fair treatment of workers, by:</p> <p>1.2.1 Improving women's awareness of their rights in relation to pregnancy and maternity and improving employers' compliance with their responsibilities.</p> <p>1.2.2 Investigating policies and procedures used to address complaints of unlawful discrimination and victimisation of police personnel by the Metropolitan Police Service (MPS).</p> <p>1.2.3 Supporting employers to understand their responsibilities in relation to religion or belief in the workplace, and assessing the effectiveness and adequacy of current legislation.</p> <p>1.2.4 Improving compliance with equality and human rights laws in employment practices in the cleaning sector.</p> <p>1.2.5 Supporting businesses to respect human rights.</p> <p>1.2.6 Helping small and medium-sized enterprises make better use of talent.</p> <p>1.3: Tackle under-representation at senior levels, by:</p> <p>1.3.1 Improving recruitment practice in FTSE 350 companies to promote diversity on FTSE boards.</p>	<p>Key project: Examining the state of access to civil justice</p> <p>2.1: Ensure services treat everyone fairly, by:</p> <p>2.1.1 Increasing participation of under-represented groups in sport.</p> <p>2.1.2 Transferring our expertise and learning to reduce the inappropriate use of police stop and search powers.</p> <p>2.1.3 Tackling discrimination and disadvantage experienced by Gypsy, Traveller and Roma communities.</p> <p>2.2: Maximise the potential for key public services to close equality gaps and protect human rights, by:</p> <p>2.2.1 Supporting initiatives to achieve greater equality in education.</p> <p>2.2.2 Raising levels of compliance with equality and human rights standards in health and social care.</p> <p>2.2.3 Promoting equality and fair financial decision-making in Spending Reviews.</p> <p>2.3: Provide tools to help public bodies, by:</p> <p>2.3.1 Helping public authorities meet the Public Sector Equality Duty.</p> <p>2.3.2 Supporting schools to increase participation and attainment.</p> <p>2.3.3 Collaborating with non-economic regulators, inspectorates and ombudsmen.</p>	<p>Key project: Assessing the relationship between attitudes, values and behaviours</p> <p>3.1: Tackle prejudice and reduce identity-based violence, by:</p> <p>3.1.1 Reducing the incidence of identity-based bullying and harassment in schools.</p> <p>3.1.2 Improving the reporting of lesbian, gay, bisexual and transgender (LGB and T) hate crime.</p> <p>3.2: Safeguard those least able to assert their own rights, by:</p> <p>3.2.1 Pressing for action to reduce avoidable deaths of adults with mental health conditions in State detention.</p> <p>3.2.2 Reducing incidents of disability-related harassment.</p> <p>3.2.3 Fulfilling our responsibilities as an A-rated National Human Rights Institute (NHRI) and protect human rights.</p>
<p>Statutory Committees</p>	<p>Our core work</p>	
<p>Disability work programme: Providing expert advice on disability-related aspects of the Commission's work and delivering an engagement strategy to develop and maintain effective partnerships.</p>	<p>Human Rights: Human rights promotion, education and influencing, Universal Periodic Review and treaty monitoring.</p>	<p>Communications and engagement: Explaining equality and human rights, rebutting myths, building partnerships, and engaging staff.</p>
<p>Scotland work programme: Providing information, advice and guidance and conducting research in Scotland, and advising the Scottish Government about the effect of Scottish Legislation.</p>	<p>Research: Providing robust evidence on the state of equality and human rights in Great Britain.</p>	<p>Responding to external developments: Safeguarding our NHRI A Status, considering the equality and human rights implications of constitutional change or any proposals to alter the legal framework or human rights in Great Britain.</p>
<p>Wales work programme: Providing information, advice and guidance and conducting research in Scotland, and advising the Scottish Government about the effect of Scottish Legislation.</p>	<p>Legal work: Supporting or taking cases or intervening in proceedings to clarify the law or prevent or address breaches of the Equality Act 2010 or human rights law.</p>	<p>Organisational improvement and developing our people: Providing corporate support services, delivering efficiency savings and developing a high-performing organisation.</p>

Contacts

This publication and related equality and human rights resources are available from the Commission's website: **www.equalityhumanrights.com**

For advice, information or guidance on equality, discrimination or human rights issues, please contact the Equality Advisory and Support Service, a free and independent service.

Website www.equalityadvisoryservice.com

Telephone 0808 800 0082

Textphone 0808 800 0084

Hours 09:00 to 20:00 (Monday to Friday)
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Questions and comments regarding this publication may be addressed to: **correspondence@equalityhumanrights.com**. The Commission welcomes your feedback.

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