



National Lottery  
Commission

Single Equality Scheme  
March 2009

# Contents

<b>Foreword</b> .....	<b>3</b>
<b>1.0 Introduction</b> .....	<b>3</b>
1.1 About the National Lottery Commission .....	3
1.2 Our vision.....	3
1.3 Our mission statement.....	3
1.4 Our core values .....	3
1.5 Our contact with the public .....	4
1.5.1 Lottery players.....	4
1.5.2 Stakeholders .....	4
1.6 Our approach to equality and diversity .....	5
1.7 The Single Equality Scheme .....	6
1.8 How the scheme was developed.....	6
<b>2.0 Where we are now</b> .....	<b>8</b>
2.1 Our staff .....	8
2.2 The National Lottery Commission’s work so far .....	9
2.2.1 Disability Equality .....	9
2.2.2 Gender Equality .....	9
2.2.3 Race Equality .....	10
2.2.4 Religious Equality.....	10
2.3 Feedback from consultation with staff .....	10
2.4 Continuing consultation & involvement.....	11
<b>3.0 Implementing the equality scheme</b> .....	<b>12</b>
3.1 Responsibility for the scheme, measuring and reporting on progress .....	12
3.2 Reporting on progress .....	12
<b>4.0 Single equality scheme action plan</b> .....	<b>13</b>
4.1 Key Priorities & Actions .....	13
4.2 Promoting a fair and inclusive business .....	13
4.2.1 Objectives .....	13
4.2.2 Practical actions .....	13
4.3 Gender equality .....	14
4.4 Disability equality .....	15
4.5 Race Equality.....	16
4.6 Impact Assessments.....	16
<b>The public duties on gender, race &amp; disability: A summary</b> .....	<b>18</b>
<b>5.0 Action Plan – 2009 - 2012</b> .....	<b>21</b>

## **National Lottery Commission Chief Executive's Foreword**

The Commission is committed to promoting equal opportunities and diversity and welcomes the introduction of the race, gender and disability equality duties.

We are pleased to present our first Single Equality Scheme as part of our commitment to meeting these duties. We are looking to achieve the main aim of our Single Equality Scheme which is to ensure that the promotion of equal opportunities and diversity is integrated into all parts of the business and activities, including policy development, service delivery and employment.

The Single Equality Scheme builds upon what we have achieved through our Disability Equality Scheme. The Single Equality Scheme replaces this to encompass all aspects of equal opportunities and diversity.

We recognise that embedding diversity and equality will be a continuous process requiring constant development and involvement from employees and other key stakeholders. The scheme is just the beginning of our commitment to promote equality and diversity.

My colleagues and I look forward to working with our staff and customers in implementing the Action Plan which we have devised following the development of our scheme.



**Mark Harris**  
**Chief Executive**

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## **1.0 INTRODUCTION**

### **1.1 About the National Lottery Commission**

The Commission is a Non-Departmental Public Body, sponsored by the Department for Culture, Media and Sport. We operate at arm's length from government and our decisions are independent. We are responsible for licensing and regulating the National Lottery. We also undertake the process to award the licence to operate the Lottery.

The Commission is governed by the National Lottery etc. Act 1993 (as amended) which gives us the following duties:

- to ensure that the National Lottery, and every lottery that forms part of it, is run with all due propriety;
- to ensure that the interests of every participant in the Lottery are protected; and
- subject to these two duties, do our best to ensure that the proceeds of the National Lottery are as great as possible.

The Commission currently comprises six non-executive Commissioners (including the Chair) and one executive Commissioner (the Chief Executive), all of whom are appointed by the Secretary of State for Culture, Media and Sport. The Commissioners appoint the Chief Executive of the Commission who is responsible for the day-to-day operation of the Commission. Commissioners meet each month to consider lottery regulation matters.

### **1.2 Our vision**

A National Lottery that delivers increased funds to the good causes and enjoyment for the nation.

### **1.3 Our mission statement**

We secure public trust and enthusiasm for the National Lottery through the exercising of our statutory duties:

- (a) that the National Lottery, and every lottery that forms part of it is run with all due propriety;
- (b) that the interests of every participant in a lottery that forms part of the National Lottery are protected; and
- (c) subject to (a) and (b) do our best to secure that the proceeds of the National Lottery are as great as possible.

### **1.4 Our core values**

**Integrity:** We will be fair, honest and open in all our dealings, decisions and actions

**Accountability:** We will each take ownership of our responsibilities, embracing challenges with professionalism to achieve the Commission's goals.

**Communication:** We will share relevant information in a timely and concise manner with each other and our stakeholders, enabling and encouraging effective two-way communication.

**Team work:** We will work together to achieve the Commission's goals, encouraging each other to develop and make the organisation an enjoyable and rewarding place to work whilst achieving the Commission's goals

**Excellence:** We will deliver to the highest standards, identifying and taking opportunities to continuously improve and develop.

## **1.5 Our contact with the public**

### **1.5.1 Lottery players**

The Commission has licensed Camelot Group plc as the operator of the National Lottery and is responsible for responding to complaints and enquiries. The Commission is able to review cases where individuals are dissatisfied with Camelot's response. In addition, we also deal with complaints and enquiries in relation to the role of the Commission, for example in regard to our decision to license particular National Lottery games. Last year we responded to around 1,700 complaints and enquiries.

We are generally contacted by players and other members of the public, in the following ways:

- email;
- telephone;
- post; and occasionally
- fax.

### **1.5.2 Stakeholders**

We work hard to keep all our stakeholders informed about what we do and the effort we put in to create a fair Lottery for the nation. The Lottery touches the lives of many people throughout the UK and we develop and value relationships with a diverse range of people.

Our stakeholders include:

- lottery players;
- government;
- faith groups;
- academics;
- media; and
- other regulators

With our Single Equality Scheme we want to make sure that all our stakeholders including players, have equal access to the services and information we provide and this is what we will continue to focus on.

## **1.6 Our approach to equality and diversity**

The Commission is committed to valuing and promoting equality of opportunity. Our approach to diversity and equality covers everyone. We aim to ensure that staff and job applicants have equality of opportunity for employment and advancement on the basis of ability, qualifications and suitability for the work, no matter what their age, colour of their skin, disability, ethnic or national origin, marital status, race, sex, transgender status, sexual orientation, religion, belief or other factors that do not relate to job performance. We are committed to providing a flexible environment in which, wherever possible, individual needs can be met.

We also seek to ensure that the response, advice and guidance we provide to our players and stakeholders is accessible and appropriate to their needs. In support of this, we place a great deal of emphasis on assessing the perceptions, needs and expectations of our players and stakeholders. We aim to ensure that in our dealings with all sections of the Lottery community we make clear our commitment to promoting equality of opportunity and meeting diverse needs and that this is reflected in the way we do our work.

As a small regulatory body, the Commission's main relationship is with the private operator of the Lottery. We have relatively little direct interaction with members of the public and we do not have any form of marketing function. Therefore, our activities in relation to disability may not be as comprehensive as other public authorities that deal with a wider spectrum of the general public.

The Commission has made clear progress in promoting and supporting equalities issues. As an organisation we operate a comprehensive Equal Opportunities Policy. We ensure that all equality issues are incorporated into our strategic business objectives and are reflected in our policies and procedures. We do however acknowledge that there is further room for improvement, hence the drafting of this scheme which presents our future strategy on continuing to promote equality.

In late 2007, we published a revised Equal Opportunities Policy which included guidance on harassment and bullying that was accompanied by extensive training on this issue for both managers and staff.

We are keen to promote understanding and awareness of different cultures and faiths. We design internal events and training to achieve this. Recent examples include, 'Around the World in 20 Dishes' which celebrated different foods from around the world. Staff were invited to bring in a dish from a different country, region, culture or religion that they had a connection with. Staff were able to find out more about their colleagues, where they came from and about different foods from around the world.

We also held events to raise awareness about Diwali and Chinese New Year to raise awareness amongst staff. Staff were invited to actively participate in these events and gain some new knowledge about different cultures and religions. We are also planning to arrange similar events for other significant festivals in the calendars of other religions, races or nationalities.

## 1.7 The Single Equality Scheme

New legal duties have been placed on all public bodies to promote equality in employment and in the delivery of services, in relation to race, gender and disability and to develop a programme of action in support of this. These duties are called the Gender Equality Duty, the Race Equality Duty and the Disability Equality Duty. The key elements of these duties are summarised in Appendix 1.

In order to meet these duties, and to ensure that the Commission brings together all of the work we are doing on equality and diversity, we have developed this **Single Equality Scheme** setting out our objectives and priorities for all aspects of equality and diversity – both in the work place and in our external work with players and other stakeholders. This scheme builds on the work we have already carried out, in particular, with our Disability Scheme and the achievements we have made. Its overall aim is to maintain a culture that is fair and inclusive and that promotes respect for all, regardless of age, colour of the skin, disability, ethnic or national origin, marital status, race, sex, transgender status, sexual orientation, religion or belief.

## 1.8 How the scheme was developed

In order to provide the foundations for the Scheme we conducted a review of our current approach and achievements. This review included:

- Discussions with senior managers on the Commission's approach to human resource management, training and development and service delivery in order to identify opportunities and priorities for reflecting our equality and diversity objectives.
- Consultation with all staff, by means of an electronic survey seeking their views on main priorities and objectives for the Equality Scheme.
- An assessment of current human resources, communications and other customer focused policies and their practical application.

We used the findings of this review as the basis for developing our Single Equality Scheme and designed it to ensure that our priorities and actions are practical and relevant, both to the work of the regulator and to the main goals that have been identified.

The above activities have built upon the consultation we carried out in regard to our Disability Equality Scheme. We recognised the involvement of disabled people and staff was critical to the Disability Equality Scheme, and, therefore, this will be an ongoing activity. We consulted both internally and externally - internally with our employees and externally with a group of people with different disabilities.

In regard to external research and involvement, our consultation was wide-ranging and involved people with different types of disabilities and backgrounds. We asked these individuals to complete a questionnaire asking for their views on key areas of business and activities for the Commission and how our policies in these areas impact upon people with disabilities and also any improvements we can make to these policies.

The external consultation involved communicating with 16 disabled people with disabilities ranging from mobility impairments, a person with learning difficulties, a blind person and a person with a hearing impairment.

In regard to internal research and involvement, two workshops were held with Commission employees (both disabled and non-disabled staff interested in disability issues) covering issues of disability within the Commission, communications, customer complaints, compliance, employment and general issues and asking for their views on how our policies in these areas impact upon disabled people and also any improvements we can make to these policies.

The output from this consultation exercise forms the basis of this report and the disability actions in the Action Plan.

## 2.0 WHERE WE ARE NOW

### 2.1 Our staff

Our diversity monitoring shows the following staff profile:

#### Gender

Male	48%
Female	52%

#### Age

20 – 30	34%
31 – 40	27%
41 - 50	23%
51 – 60	14%
61 – 65	2%

#### Disability

Disclosed a disability	9%
Not disclosed a disability	91%

#### Contract Types

Permanent staff	86%
Fixed term staff	14%

#### Ethnic Origin

White - British	75%
White - Irish	2%
White - Other	2%
Black African	5%
Black Caribbean	5%
Black Other	2%
Indian	2%
Asian	2%
Pakistani	0%
Bangladeshi	0%
Chinese	0%
Other	5%
Unknown	0%

Additional work will be carried out during 2009 to improve our diversity monitoring processes with the aim of achieving accurate and up to date information that can be used as a baseline for our monitoring in this area.

## **2.2 The National Lottery Commission's work so far**

### **2.2.1 Disability Equality**

Following a successful application in February 2004, the Commission became an accredited Two Ticks Disability Symbol User. In March 2006, Jobcentre Plus visited the Commission to review our use of the symbol and we passed the review and can continue to be an accredited disability symbol user employer. Further, we agreed that the Disability Equality Advisor (DEA) can provide our details to other Symbol User applicants so that we can act as an advocate and an example of good practice for the Disability Symbol User Scheme and share information with other employers.

We intend to continue our relationship with the DEA at our local Jobcentre Plus through strengthening our ties with the advisor and consulting with them for advice on future action that might be needed to further promote disability equality.

We carry out an annual staff health questionnaire with every employee to identify any disability issues so that we can then ensure that all staff are provided with appropriate support. We recently carried out our 2008/2009 annual health survey and are currently taking action to ensure we consider what reasonable adjustments we need to make for each employee who has declared they require adjustments to be made.

We also monitor disabled employees and applicants via equal opportunities monitoring forms on our application forms, feedback sessions, appraisals and staff surveys.

As part of the Positive About Disability application, all staff received one day disability awareness training and the Human Resources team is in the process of arranging for a refresher course for the coming year.

As an organisation with regulatory authority over the operator of the National Lottery, we are exploring the requirements that the Commission places on the licence operator in respect of meeting the needs of disabled employees and players.

We work proactively with the operator to help improve access to the Ifor disabled people. For example, following a complaint from a blind couple, Camelot improved their service to disabled people by making a telephone subscription service for players who were not able to purchase tickets at retailers or online.

### **2.2.2 Gender Equality**

We offer a wide range of flexible working options including part-time working, home working and compressed hours working which are available to men and women.

The current gender profile of our senior team and Commissioners is as follows:

#### **Commissioners**

Male	57%
Female	43%

## Directors

Male	50%
Female	50%

We conducted some research on female participation on the Lottery to help us better understand female players. We will use the results of this research to inform our regulatory approach as we move forward. The research is published on our website ([www.natlotcomm.gov.uk](http://www.natlotcomm.gov.uk))

### 2.2.3 Race Equality

Part of our recruitment strategy is to aim to attract candidates from as a broad a base as possible. We use a variety of different recruitment methods including the internet, newspapers, and agencies. We use the Black Britain website to attract candidates from different ethnic backgrounds and origins.

We also advise our recruitment agencies that in putting candidates forward they must, where possible, include at least one female candidate, an ethnic minority candidate and a disabled candidate.

In our job descriptions we undertake to devise criteria that will aim not to exclude people from different backgrounds but to attract individuals who may not have direct experience of a role but possess a relevant set of skills.

### 2.2.4 Religious Equality

We have identified faith groups with a stakeholder interest in the operation of the National Lottery and communicate with these groups on a regular basis.

We encourage people from all faiths to work at the Commission.

## 2.3 Feedback from consultation with staff

During 2008 we obtained feedback from staff through the following main channels:

- an electronic survey of all staff;
- interviews with directors, managers and staff responsible for specific elements of the Commission's work; and
- discussion with the senior executive team.

The electronic staff survey invited suggestions or comments on the following:

- Promoting or improving opportunities within the Commission (in the context of the Single Equality Scheme);
- Actions the Commission should take in order to ensure that they are responding to diversity among their stakeholders; and
- Any other observations with regard to equality and diversity and the development of the Single Equality Scheme.

The electronic staff survey provided a variety of different views and the majority were positive and encouraging. The prevailing view was that no particular initiatives were needed in regard to equal opportunities at the Commission. The following themes were particularly relevant in providing the foundations for the Equality Scheme:

In relation to staff:

- feedback on equal opportunities and diversity training was very positive;
- feedback on the availability of flexible working was generally positive. There were some comments on consistent application of flexible working policies;
- it was felt that our recruitment processes do seek to attract people from minority groups although our record on attracting disabled candidates could be improved;
- some felt we could do more on raising awareness of significant dates for different cultures and religions; and
- the idea of a Single Equality Scheme was welcomed.

In relation to stakeholders and players:

- respondents felt that events arranged by the Commission were accessible by disabled people;
- there were several comments on the availability or otherwise of our literature in Braille, audio, different languages etc;
- training may be beneficial for those who have direct involvement with players. A charter may be of benefit so members of the general public know what to expect from us; and
- there could be more active promotion of the role of the Commission to the general public.

## **2.4 Continuing consultation & involvement**

The Commission conducts regular staff satisfaction surveys and will obtain feedback on staff perceptions of equality and diversity issues through these surveys.

Customer profile data in relation to complaints will be further developed so that feedback on issues that affect particular groups of players and stakeholders can be identified through this profiling.

The Staff Consultative Group meets periodically to consider staff policies such as Equal Opportunities, Employing People with Disabilities and Harassment and Bullying policies. The Group invites views from staff on the development of these types of policies.

Staff will be invited to join the Single Equality Scheme stakeholder panel to enable contribution and involvement in the implementation of the scheme and steps in the action plan.

### **3.0 IMPLEMENTING THE EQUALITY SCHEME**

#### **3.1 Responsibility for the equality scheme, measuring and reporting on progress**

The Chief Executive has overall responsibility for ensuring the scheme is implemented and will report on progress to Commissioners. The Director's Group will receive reports of progress. Progress on specific elements of the Scheme will be overseen and reviewed at Business Head of Team level as follows:

- **Head of Human Resources:** HR related and learning and development actions.
- **Head of Communications:** communications and information actions.
- **Head of Finance:** facilities and procurement actions.
- **Head of Performance:** research actions.

These Heads of Teams will form the Stakeholder Panel chaired by the Director of Resources to report, review and monitor progress against the Action Plan.

Indicators of progress will be developed during the first year of the Scheme. In broad terms these will be:

- impact assessments completed and corresponding measures in place where appropriate;
- appropriate training and guidance established for managers and staff;
- equality and diversity objectives reflected in procurement strategies;
- progress towards increasing the diversity profile of job applicants, and where appropriate, staff in post;
- positive feedback from players and stakeholders; and
- positive feedback from staff on employment related practice.

The Action Plan outlines timescales for action and accountabilities for each of the key elements of the Equality Scheme. The Stakeholder Panel will meet to review and monitor progress and will highlight issues that need addressing.

The Scheme will be fully reviewed after three years.

#### **3.2 Reporting on progress**

The Equality Scheme will be published on the Commission's website and annual reviews of progress, including the results of reviews will also be made available.

The Scheme will also be promoted to our external stakeholders, including recruitment agencies and, suppliers of services.

## **4.0 SINGLE EQUALITY SCHEME ACTION PLAN**

### **4.1 Key Priorities & Actions**

The scheme covers all aspects of equality and diversity within the Commission. Many of the actions are designed to promote equality and diversity across the board, while some have a particular relevance to race or gender, or to staff or customers who are disabled. In making these distinctions, however, we are aware that in many cases actions designed with a particular group or need in mind, will have a wider beneficial effect. Steps to ensure that approaches to communication are appropriate for disabled staff or customers, for example, will often result in improved communications for all.

In the following sections we set out our priorities and actions. In Section 5, we outline an action plan, showing how these will be incorporated into our three year programme. The actions are grouped to show:

1. those that reflect our overall commitment to a fair and inclusive working environment and service delivery;
2. those that are particularly relevant to the Gender Equality Duty;
3. those that are particularly relevant to the Race Equality Duty; and
4. those that are particularly relevant to the Disability Duty.

### **4.2 Promoting a fair and inclusive business**

#### **4.2.1 Objectives**

- We aim to promote a positive image of the regulator's commitment to equality, diversity and inclusion.
- We aim to ensure that our policies and practices in relation to staff recruitment, management and working environment are fair and transparent and that real value is placed on diversity.
- We aim to ensure that our services to players are responsive to diverse needs and backgrounds.

#### **4.2.2 Practical actions**

##### **Players and external relations**

We will aim to:

- Make clear the Commission's approach to equality, diversity and inclusion in our external communications, through our website and other publicity channels; and in recruitment literature.
- Make sure that our procurement policies enable us to meet our equality objectives, including our guidance for staff on stages at which equality and diversity issues need to be considered.
- Review our communications policies and mechanisms to ensure that information (and its presentation) is fully accessible to all our players and stakeholders.

- Use our research channels to obtain a diversity profile of our stakeholders and potential information needs.

## **Staffing**

We will aim to:

- Take practical steps to ensure that the working environment and the application of HR policies is fair and inclusive in relation to age, religion, sexual orientation and transsexual individuals, as well as to disabled people, those from all ethnic backgrounds and both men and women.
- Review our channels for promoting job opportunities and recruiting staff (including recruitment agencies) to ensure that they encourage applications from a diverse applicant pool where possible.
- Incorporate relevant guidance in recruitment, selection and management training for managers (and in requirements of external agencies) designed to ensure that the Commission's commitment to equality, diversity and inclusion is translated into action, including:
  - developing inclusive recruitment channels;
  - appropriate assessment of competencies and behaviours in selection and performance development;
  - promotion of opportunities for staff learning and development; and
  - review the framework of competencies with a view to incorporating equality and diversity focused objectives within the framework.
- Establish the diversity monitoring system to enable diversity monitoring of staff in post, as well as staff progression and experiences (covering the categories outlined under the Race Equality Duty actions).
- Establish a revised system for monitoring selection based on the approach used for staff in post.
- Produce and promote a Dignity at Work policy, designed to define clear standards of behaviour and to ensure that any harassment or other cases are effectively addressed.
- Ensure that our flexible working arrangements supports diverse needs, including caring responsibilities, as well as those of the business and that managers take a consistent approach to requests.
- Continue to consult staff on progress through consultation.

### **4.3 Gender equality**

We will aim to ensure that the measures outlined above support the Commission's commitment to gender equality and the requirements of the Gender Equality Duty by:

- Including gender equality within our strategies for external communications, relationships with players and, where appropriate, our stakeholder research –

so that any specific issues that affect women or men in particular can be identified.

- Include gender equality in our programme of guidance and training on key HR related issues.
- Use our diversity monitoring data on staff and job applicants to check that recruitment, selection and management processes (including recruitment led by external agencies) are fairly applied between men and women.
- Make clear that our commitment to inclusion covers transsexual individuals.
- Carry out a full equal pay audit as part of the annual pay review, including an analysis of the causes of any pay gap that is found (to include the impact of such factors as caring responsibilities).
- Make sure that approaches to maternity and paternity leave, and to return after such leave, reflects good practice and that flexible working policies are responsive to the needs of staff with caring responsibilities, both male and female.

#### **4.4 Disability equality**

We will aim to ensure that the measures outlined above support the Commission's commitment to disability equality, and the requirements of the Disability Equality Duty by:

- Including disability equality within our strategies for external communications, relationships with players and where, appropriate, our stakeholder research.
- Reviewing the extent to which the Commission's information, guidance and other services are accessible to disabled players and other stakeholders.
- Continuing to consult with disabled staff on effective measures to reach out to disabled job seekers, and to support career development.
- Include disability equality issues in our programmes of guidance and training on key HR related issues. As part of this, provide specific disability awareness training for staff.
- Use our diversity monitoring data on staff and job applicants to check that recruitment, selection and management processes (including recruitment led by external agencies) are responsive to the needs of disabled individuals, including a review of the facilities for disabled applicants.
- Continue to review office/physical facilities and internal communications to ensure that they meet the needs of disabled staff.
- Encouraging good practice in the operator of the Lottery.

## **4.5 Race Equality**

We will aim to ensure that the measures outlined above support the Commission's commitment to race equality, and the requirements of the Race Equality Duty by:

- Considering race equality issues within our strategies for external communications, relationships with players and, where appropriate, our stakeholder research – so that any specific issues can be identified e.g., use of language, familiarity with relevant networks; issues for minority groups.
- Include race equality in our programmes of guidance and training on key HR related issues.
- Review our recruitment and selection channels, including secondments and recruitment exercises led by external agencies, to ensure that they are reaching minority ethnic groups.
- Checking staff and job applicants against diversity monitoring data to ensure that selection and management processes (including recruitment led by external agencies) are fairly applied between different groups.

## **4.6 Impact Assessments**

A series of impact assessments will be carried out as part of the Equality Scheme's first three years of operation. These are described in more detail under Actions. Broadly they will cover:

- key HR policies: recruitment and selection; performance development and secondments;
- reviews of the organisational structure, performance appraisal systems, pay and reward systems including an equal pay review;
- flexible working policies;
- procurement policies;
- communications and research strategies; and
- complaints procedures.

The aim of the impact assessments will be to identify the extent to which key elements of the Commission's policies and practices provide fair access to opportunities within the organisation, or to the services it provides. Areas for impact assessments have been chosen because they are important elements of our work both internally and externally, and because they have a clear impact on people, whether staff, stakeholders or players.

We see the role of impact assessments as helping us to be effective in what we do. They will help us to ensure our policies or the ways in which they are delivered do not unintentionally disadvantage or discriminate against some groups, for reasons that cannot be lawfully justified by business necessity, for example because they are not appropriately accessible or because processes are not consistently applied.

The process for carrying out impact assessment will be based on that recommended in the codes of practice attached to the three statutory duties and will have a clear focus on outcomes. Questions will include:

- Is there evidence of different outcomes for different groups of staff, stakeholders and players? For example, does diversity monitoring data show patterns of outcomes in the some groups are less likely to apply for jobs or to access our services, to be short listed or selected?
- Is there scope to promote our opportunities or services more widely?
- Is there evidence of particular needs or factors among some groups of staff or customers that should or could be met?
- Where there is evidence of barriers to equality of opportunity or access, what changes can be made to address these?

Data sources will include:

- staff and job applicant monitoring;
- stakeholder surveys;
- staff perception surveys;
- discussions at the Stakeholder Panel Meeting; and
- benchmarking data e.g., in relation to diversity profiles in appropriate; recruitment pools/labour markets.

## **The Public duties on gender, race & disability: a summary**

The Commission is covered by the requirements of the Disability Duty and the Gender Equality Duty (both general and specific duties) and the Race Equality Duty (general and employment duties). The main requirements of these Duties are summarised below:

### **1. The Disability Duty**

This was established by the Discrimination Act 2005.

#### **(a) The General Duty**

This applies to all public authorities (with a few exceptions) and requires that every public authority 'shall in carrying out its function have due regard for the need to:

- Promote equal opportunity between disabled persons and other persons;
- Eliminate discrimination that is unlawful under the Act;
- Eliminate harassment of disabled persons that is related to their disabilities;
- Promote positive attitudes towards disabled persons;
- Encourage participation by disabled persons in public life; and
- Take steps to take account of disabled persons' disabilities even where that involves treating disabled persons more favourably than other persons.

'Due regard' contains two linked elements:

- Proportionality and relevance- i.e. authorities 'should give due weight to the need to promote disability equality in proportion to its relevance' (The DRC Code defines these concepts further).

#### **(b) Specific duties**

These are the public authorities covered by the duties to:

- Produce a Disability Equality Scheme;
- Involve disabled people in developing this scheme; and
- Include within the scheme a statement of:
  - The way in which disabled people have been involved in developing it;
  - Methods for impact assessment (covering the impact of policies and practices as well as the likely impact of proposed policies and practices);
  - Steps that will be taken to fulfil the general duty (the 'action plan');
  - An authority's arrangement for gathering information on employment and where appropriate – its delivery of education and its functions; and
  - Arrangements for putting in the information gathered to use, in particular reviewing the effectiveness of its action plan and preparing subsequent schemes.

Within three years of the scheme being published, the authority must:

- Take the steps set out in its action plan (unless unreasonable or impractical to do so) and put into effect the arrangements for gathering information and

making use of it;

- Publish a report with:
  - a summary of the steps taken under the action plan;
  - the results of information gathering; and
  - the use to which the information has been put.

## **2. The Gender Equality Duty**

### **(a) The General Duty**

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

- to eliminate unlawful discrimination and harassment; and
- to promote equality of opportunity between men and women in all of their functions.

This is known as the 'general duty' and will come into effect on 6 April 2007. As with the race and disability duties there are principles of relevance and proportionality:

*“The weight which public authorities give to gender equality should therefore be proportionate to its relevance to a particular function. The greater the relevance of a function to gender equality, the greater regard which should be paid to it.”*

### **Gender Reassignment**

As part of the duty, public authorities are also required to have due regard to the need to eliminate unlawful discrimination and harassment in employment and vocational training (including further and higher education), for people who intend to undergo, are undergoing or have undergone gender reassignment.

### **(b) The Specific Duties**

The specific duties are to:

- Prepare and publish a Gender Equality Scheme showing how the authority intends to fulfil the general and specific duties and setting out its gender equality objectives.
- In preparing the scheme:
  - Consult employees, service users and others (including trade unions); and
  - Take into account any information it has gathered or considers relevant as to how its policies and practices affect gender equality in the workplace and in the work place and in the delivery of its services.
- In formulating overall gender equality objectives, consider the need to have objectives to address the causes of any gender pay gap.

- Ensure that the scheme sets out the actions the authority intends to take to:
  - gather information on the effect of its policies and practices on men and women, in employment, services and performance of its functions;
  - use the information to review the implementation of the scheme objectives;
  - assess the impact of its current and future policies and practices on gender equality;
  - consult relevant employees, service users and others (including trade unions); and
  - ensure implementation of the scheme objectives.
- Implement the scheme and its actions for gathering and using information within three years of publication, unless it is unreasonable or impractical to do so.
- Review and revise the scheme at least every three years.
- Report on progress annually.

### **3. The Race Equality Duty**

This came into effect in April 2001, with specific duties operational from December 2001.

#### **(a) The General Duty**

This requires public authorities, in carrying out their functions, to have due regard for the need to:

- Eliminate unlawful racial discrimination;
- Promote equality of opportunity; and
- Promote good relations between people of different racial groups.

#### **(a) The Employment Duty**

This applies to all those covered by the specific duties and to an additional list of authorities and requires:

- For all sizes of employer – monitoring of staff in post and applicants for employment, training and promotion – by ethnic origin.
- For those with 150 staff or more (full time equivalent) – monitoring of grievances, disciplinary action, performance appraisal of those receiving training and those leaving employment.
- For all employers – annual publishing of monitoring results.

## 5.0 Action Plan – 2009 - 2012

<b>Single Equality Scheme</b>				
<b>(1) Implementation &amp; Monitoring of Scheme</b>				
<b>Objectives/Goals</b>	<b>Action</b>	<b>Outcome</b>	<b>Owner(s)</b>	<b>Timescale</b>
1. To develop and publish a Single Equality Scheme (SES) for the NLC.	Develop Single Equality Scheme for NLC.	SES developed for NLC.	Resources & Communications Directorate	Publish on NLC website by March 2009.
2. To increase awareness of scheme at a corporate level.	Arrange awareness workshop with senior management team (including Commissioners).	Increased awareness of single equality and the implementation at senior level.	Resources Directorate	<b>Complete</b> End December 2008
3. Establish a stakeholder panel to oversee the implementation of the action plan.	HR to set up group comprising of representatives from Customer Protection, Resources and Communications & Performance.	Panel created to oversee and ensure implementation of our single equality scheme work	Resources, Communications and Licensing Directorates	<b>Complete</b> End of December 2008
4. To raise awareness of the scheme across the organisation.	Arrange equality awareness sessions for all staff through coffee break briefings and more formal awareness sessions.  To ensure all staff are aware of need to assess impact of any NLC review, policy and	Increased awareness of the NLC's commitment to equal opportunities.	Resources & Communications Directorate	<b>Complete</b> End of December 2008.  Thereafter ongoing activity

	procedure development, training, public consultation facilities management etc on minority groups.			
5. To monitor the implementation of the scheme.	To report to our external consultation group on the contents of our Action Plan. This group has people from under-represented groups.  To report in NLC Annual Report on progress against Action Plan.	Identification of areas where impact assessment needed.	Stakeholder Panel (to include people from under-represented groups)	Review at end of each Quarter.  End of each business year for next 3 years.
6. Ensure all NLC polices, projects and functions are monitored and screened for impact on minority groups and where appropriate an impact assessment is conducted.	Develop IA (Impact Assessment tool). Training to be rolled out across organisation on how to use tool.	The NLC's policies will be more attuned to the needs of people with disabilities and the IA will become an integral part of policy making within the NLC.	Stakeholder Panel	Year 2
<b>(2) Employment Practices</b>				
<b>Objectives/Goals</b>	<b>Action</b>	<b>Outcome</b>	<b>Owner(s)</b>	<b>Timescale</b>
1. Ensure our recruitment literature is accessible to	Review application process documentation.	Recruitment literature that is accessible to people with disabilities.	Human Resources	Year 2

people with disabilities.				
2. Carry out an impact assessment on the NLC's recruitment practices.	Arrange impact assessment.	Impact assessment to recommend where improvements to recruitment procedures can be made.	Human Resources	Year 2
3. Draft clear policy on recruitment and employment of disabled people to ensure all employees are confidently able to apply this.	Draft policy on recruitment and employment of disabled staff.	Policy published on recruitment and employment of disabled people. Policy to include procedure in regard to implementation of reasonable adjustments.	Human Resources	End of December 2009
4. Carry out an impact assessment on the NLC's potential barriers to access for disabled employees and visitors.	Arrange impact assessment.	Impact assessment to recommend where improvements on access to our buildings can be made.	Finance & Facilities Management Team	Year 2
5. To improve equal opportunities monitoring system.	To review and implement changes to our equal opportunities monitoring system.	A robust process for establishing the diversity profiles of staff and job applicants.	Human Resources	End of December 2009
6. To review our	To review and where appropriate	A policy to fully encompass all equal	Human Resources	Year 2

Equal Opportunities Policy to ensure it fully covers Dignity at Work issues such as bullying and harassment.	develop and expand our Equal Opportunities Policy.	opportunities issues so that all staff fully understand the NLC's commitment and policy in this area.		
7. To ensure the NLC meets its equal pay obligations.	To carry out an equal pay audit.	A pay and reward system that fully meets the requirements of equal pay legislation.	Human Resources	Year 2
<b>(3) Procurement</b>				
<b>Objectives/Goals</b>	<b>Action</b>	<b>Outcome</b>	<b>Owner(s)</b>	<b>Timescale</b>
1. Ensure the principles of the single equality scheme are embedded into the NLC tender specifications and contracts process.	Ensure principles of single equality scheme are included in guidance for staff on the NLC tendering and contracting process.	Our suppliers deliver on our equal opportunities requirements.	Finance	Ongoing
<b>(4) Communications</b>				
<b>Objectives/Goals</b>	<b>Action</b>	<b>Outcome</b>	<b>Owner(s)</b>	<b>Timescale</b>
1. Review our public engagement with disabled people.	Ensure disabled people are included in the scope of our public engagement programme.	Engagement with disabled and other minority/under-represented groups is considered in development of a public engagement programme.	Consumer Protection Team	Date to be agreed

2. Review certain aspects of the NLC website design to ensure adoption of best practice in regard to accessibility for disabled people.	Conduct review of NLC website using sources of information such as the Web Accessibility Initiative.	Improved access to NLC website for disabled people.	Communications	<b>Completed</b>  Ongoing review of website complete end of December 2008.
3. Review accessibility of information on website.	Conduct review of how accessible our information is on external website.	Improved accessibility for all to information on NLC website.	Communications	Year 1
4. Review accessibility of NLC literature for disabled people.	Conduct review of how information is currently provided and where improvements are needed.	Produce report on findings to include recommendations on where improvements can be made.	Communications	Year 2
5. Ensure NLC communications are in plain English.	To publicise house style guide on a regular basis through channels such as the all staff briefings.  Identify suitable training for staff.	Use of plain English in NLC literature.	Communications and Human Resources	Ongoing  Year 2
6. Investigate the feasibility of introducing a text phone facility for deaf people.	Conduct feasibility study in regard to introducing a text phone facility.	Report on outcome of feasibility study.	Finance & Facilities Team	End of December 2009
7. Develop and maintain links with disability media.	Develop relations with disability media.	Improved communications with disabled groups.	Communications Team	End of December 2009
8. Ensure all suppliers of NLC	Ensure suppliers are aware of NLC's obligations at outset of any	Improved awareness amongst our suppliers of our obligations.	Communications Directorate	Ongoing

literature, publications, printers, website designers and graphic designers are aware of NLC's duties under the DDA 1995 & 2005.	provision of services to the Communications Directorate.			
9. Ensure all venues used by NLC for internal and external events are accessible by disabled people.	Improved communications on access to NLC events for disabled people. Improved facilities for disabled people at NLC events.	Include paragraph to include in all letters, invitations etc. asking if there are any access requirements for the individual attending the event. For example disabled parking, British Sign Language or printed information in an alternative format.	All Directorates	Ongoing
10. Review our ability to respond to requests for access requirements for disabled people, e.g. British Sign Language speech to text technology at NLC events.	Conduct review of our ability to respond to request for access requirements for disabled people.	Identify key suppliers of specialist services for disabled people.	Communications Directorate	Year 1
<b>(5) Research</b>				
<b>Objectives/Goals</b>	<b>Action</b>	<b>Outcome</b>	<b>Owner(s)</b>	<b>Timescale</b>
1. To ensure any research	During development of annual research programme consider	We are able to demonstrate that our research has taken into account needs of particular	Performance	Annually each December

undertaken by the NLC takes into account the principles of our Single Equality Scheme.	whether there are any under-represented/minority groups that we need to focus upon. Also, in conducting our research, consider whether there are needs of a particular group that need to be taken account of.	groups and, where appropriate, responded to these needs.		
<b>(6) Customer Contact</b>				
<b>Objectives/Goals</b>	<b>Action</b>	<b>Outcome</b>	<b>Owner(s)</b>	<b>Timescale</b>
1. Maintain log of complaints received in regard to the Lottery Operator	Establish system of recording and reporting of complaints.	Review number of complaints from minority groups and action taken to resolve complaint and to advise whether improvements can be made as appropriate, for minority groups.	Consumer Protection Directorate	<b>Completed.</b>  Quarterly reports to CEO
2. Review access complaints procedures in regard to complaints about the NLC.	Review complaints against NLC procedure and accessibility of this procedure for minority groups.	Improved communication regarding our complaints procedure and improved accessibility for minority groups.	Consumer Protection Directorate	End of December 2009
<b>(7) Compliance</b>				
<b>Objectives/Goals</b>	<b>Action</b>	<b>Outcome</b>	<b>Owner(s)</b>	<b>Timescale</b>
1. Determine the extent to which the NLC's SES obligation extends to the Lottery Operator.	Explore with our legal advisors what the obligations of the NLC in regulating the Lottery Operator in respect of the race, gender and disability equality duties.	Clarification of the Commission's role in regulating the Lottery Operator in respect of the race, gender and disability equality duties.	Resources Directorate	End of December 2009