



Race, disability,  
gender, sexual  
orientation,  
religion/belief and age  
equality



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# Foreword

At Land Registry we are committed to ensuring that valuing the diversity of our staff and customers, and providing equality of opportunity, is integral to all we do.

As we pursue our mission “to provide the world’s best service for guaranteeing ownership of land and facilitating property transactions”, we believe that we must also set the highest standards in diversity if we really are to claim to be the best.

Our vision is to make property transactions easier for all. In order to achieve our vision, mainstreaming diversity will play an integral role in ensuring that our services and policies meet the needs, as far as we are able, of all our stakeholders.

Land Registry’s combined equality scheme will encompass our duties in relation to race, disability and gender as well as addressing religion or belief, sexual orientation and age. It will integrate our existing race and disability equality schemes, and will introduce our commitment under the gender equality duty.

Morally and legally we are required to deliver a fair and appropriate service to all of our customers in relation to their needs. We will consult, ensure participation and seek advice regularly from our stakeholders that will be incorporated into the delivery of an inclusive service. Our equality scheme sets the standard against which we can work to ensure we treat people from all groups and backgrounds fairly. It also gives a framework for us to provide services relevant to everyone’s needs, taking into account the likely impact on particular groups.

I am pleased to endorse this Single Equality Scheme as a platform to allow us to make further progress in valuing diversity.

**Peter Collis**  
*Chief Executive and Chief Land Registrar*  
*Land Registry*

# 1. The purpose of this equality scheme

Land Registry's first Race Equality Scheme was published in 2002 to meet our obligations under the Race Relations (Amendment) Act 2000.

Recent legislative changes have established comparable statutory duties in relation to disability and gender.

The Disability Discrimination Act 2005 introduced a Disability Equality Duty that came into force on 4 December 2006 and Land Registry has published its first Disability Equality Scheme.

The Equality Act 2006 created a Gender Equality Duty, which came into effect on 30 April 2007.

Taken together, the statutory general duties applicable to public authorities state that in carrying out their functions due regard should be paid to:

- eliminating discrimination and harassment that is unlawful under the Race Relations Act, the Disability Discrimination Act, the Sex Discrimination Act and the Equal Pay Act
- promoting equality of opportunity between people of different racial groups, between disabled and non-disabled people, and between women and men
- promoting good relations between people of different racial groups
- promoting positive attitudes towards disabled people
- encouraging participation by disabled people in public life
- taking steps to meet the needs of disabled people (even if this requires more favourable treatment).

There are also specific duties in relation to employment that require public authorities to monitor the impact of employment policies and practices.

In addition, statutory specific duties require the publication of Race, Disability and Gender Equality Schemes.

The Employment Equality Regulations 2003 in relation to religion or belief and sexual orientation made it unlawful to discriminate on grounds of religion or similar belief or on grounds of sexual orientation in employment and vocational training.

The Equality Act 2006 subsequently extended the prohibition of discrimination on grounds of religion or belief and sexual orientation to include the provision of goods, facilities and services, education, the use and disposal of premises, and the exercise of public functions.

Employment Equality (Age) Regulations 2006 came into force on 1 October 2006. These prohibit direct and indirect discrimination, harassment and victimisation on grounds of age.

In keeping with the approach in Land Registry's Managing Diversity Strategy, we have produced a combined Single Equality Scheme, integrating the statutory duties in relation to race, disability and gender as well as addressing religion/belief, sexual orientation and age. This document combines and updates the Race and Disability Equality Schemes that were produced in 2005 and 2006,

respectively, and adds our commitments under the Gender Equality Duty and in relation to religion/belief, sexual orientation and age. It includes a record of actions that we have already taken together with our plans for 2007 to 2010 (see Action Plan starting on page 39).

The objective of this approach is for Land Registry to mainstream equality and diversity – ie to make this an integral part of our activities including planning, policy-making, service delivery and employment practices. Our intention is to apply the principles derived from the statutory duties to the promotion of equality across all six diversity strands.

## 1.1 Responsibility for implementation of this equality scheme

Our business plan identifies 16 functional areas, each having a senior responsible officer at director level, who will be required to ensure that the equality scheme is implemented in their area and to include progress as part of their regular reports to the Land Registry Board and in an annual report which will be published on our website.

The functional areas, covering service delivery and employment responsibilities, are:

- corporate governance
- policy & planning
- e-business
- e-conveyancing
- financial services
- geographic information
- information systems
- legal services, legislation and technical compliance
- operations focus
- registration change
- facilities
- human resources
- education & training
- commercial services
- marketing services
- internal communication.

There is also an obligation on all employees or those acting on behalf of Land Registry to take account of the objectives and commitments of this equality scheme, to avoid unlawful discrimination and to contribute to the promotion of equality and diversity within their areas of responsibility. Under certain circumstances, individual employees as well as Land Registry may be liable for any acts of unlawful discrimination.

In each functional area, we will give due weight to the need to promote equality in relation to each diversity strand in proportion to its relevance to particular policies and practices.

## 2. Consultation

This equality scheme has been developed in consultation with and including input from the following within Land Registry.

- Disability Focus Group.
- Lesbian, Gay, Bisexual & Transgender (LGBT) Focus Group.
- Focus groups of male and female staff.
- Diversity Steering Group.
- Departmental Trade Union Side.
- Personnel managers.

It has also taken into account the findings and recommendations of the reports of focus groups to investigate career progression and the perceptions of barriers to progression for women and staff from minority ethnic groups.

In addition, feedback is being sought as part of our regular consultation with user groups and other customer representative groups.

Feedback is also being sought from external groups such as the women, disabled and ethnic minority solicitors' groups as well as LGBT-friendly solicitors identified by Stonewall.

We would like to thank all those who have contributed to the development of this equality scheme. We welcome further feedback on this document and on its implementation during 2007 to 2010.

## 3. Assessing the impact of policies and practices

### 3.1 Equality impact assessments

The equality impact assessment process identifies the functions and policies that involve or affect the public or employees and assesses their impact or potential impact on members of various groups. 'Policies' refers to all formal and informal decisions about how we use our powers and carry out our work.

As a result of our Race and Disability Equality Schemes, we have started to screen our functions and policies for their relevance to race and disability equality (as well as the other diversity strands). Some of our HR policies are also being assessed for their impact on race and disability equality. This process will continue and we will carry out full Race or Disability Impact Assessments, where appropriate.

With the implementation of our Single Equality Scheme, we will extend this procedure to include the assessment of all new functions and policies for their impact in relation to all six diversity strands – gender, sexual orientation, religion/belief and age as well as race and disability.

Existing policies will be reviewed and assessed in a rolling programme between 2007 and 2010.

The Project Initiation Document (PID), the generic guidance and template for the management and control of projects, has been amended to include the issues addressed in this Single Equality Scheme.

Equality issues are being included in our Assurance Map and will be built into our regular internal audit procedures.

Guidance has also been produced on how to carry out equality impact assessments, which explains when impact assessments should be carried out as well as the steps for each stage of the process. This updates the previous guidance to include the assessment of the impact of policies in relation to race and ethnicity, disability, gender, sexual orientation, religion and belief and age.

Further information is contained in *Equality impact assessments: Which 'policies' do we need to assess?* which is available on the Diversity pages on the intranet.

### 3.1.1 Screening

Over the next three years all functions will identify which policies or procedures are relevant to the Single Equality Scheme and undertake impact assessment screening. This will include producing priorities list of existing policies for impact assessment in the form of an action plan identifying them as high, medium or low. (please see Appendix A, 3.1) All new documents will undergo impact assessment screening.

### 3.1.2 Full equality impact assessments

A full equality impact assessment will not be necessary in every case. This will depend on the evaluation in the screening process of the relevance of that policy for any particular group.

### 3.1.3 Reporting

A summary of the results of the screening and/or full equality impact assessments should be included in any documents describing agreed policies or being submitted to boards or committees for policy decisions.

We are required to publish the results of equality impact assessments and we will ensure that summaries of the results of this process (from screening or full assessments) are easily available internally and externally in accessible and user-friendly formats.

We will report annually on the implementation of this equality scheme, including reporting on the progress of equality impact assessments, and this report will be available on our website (see also section 8).

## 3.2 Feedback on the impact of our policies

We will obtain feedback on the impact of our policies in relation to the six diversity strands externally from our customers and internally from our staff.

### 3.2.1 Customers

We will continue to actively seek feedback from our customers.

We do this through our website, customer surveys, user panels and customer discussion groups as well as our customer information centre questionnaires. Our complaints leaflet includes a tear-off slip for comments and suggestions as well as complaints.

User panels with large scale customers are held at least twice yearly. Specific consultation is undertaken with users of key services including Telephone Services and Land Registry Direct, as well as on provision of information and measurement of customer satisfaction.

We will pay particular attention to the composition of our user panels and other consultative groups to ensure that this reflects the diversity represented in the users of our services.

We hold regular meetings with the Law Society, Council of Mortgage Lenders and other representative groups. In our consultation with these groups we will now seek information on the profile of their members in relation to ethnic origin, disability, gender, sexual orientation, religion/belief and age and request information on the potential impact of our policies and services on the different groups.

In our customer surveys we invite customers to participate in discussion groups and/or visit our offices. Discussions are underway on how we will include equality monitoring in our customer surveys in the future.

We undertake written consultation exercises and aim to include all customers, either directly or indirectly through representative bodies. Notification is given in the Law Society Gazette and other appropriate publications.

The *We value your comments* questionnaire provides an opportunity for customers to let us know if they would prefer to receive information in languages other than English and Welsh. The questionnaire will be available in different formats. The responses will be analysed every quarter.

We will review the profile of the sources of our customer feedback in light of the prioritised list of those functions that are relevant to the statutory duties and diversity strands to ensure that we are obtaining the information we need to evaluate the impact of our policies. We will ensure that the form of our activities to obtain customer feedback takes account of the access needs of our diverse customers.

### 3.2.2 Employees

We seek staff feedback by means of the staff survey. Our most recent staff survey was analysed to investigate any differences in responses between subgroups by ethnicity, disability and sexual orientation. In future we will also analyse responses by gender, age and religion.

We will continue to consult staff regularly through the trade union side and various other mechanisms including focus groups.

As well as a Diversity Steering Group, we have established national staff focus groups for consultation and to provide feedback on issues related to disability, sexual orientation and transgender issues. These groups were involved in the development of this scheme and they will continue to be involved in the monitoring of progress and performance in relation to this Single Equality Scheme.

A national focus group for staff from minority ethnic backgrounds is being established in 2007.

Consultation on the development and implementation of policies will include staff members representing a range of religious beliefs as well as those without religious affiliation – and faith and community groups with an interest in religious matters, where appropriate.

We will ensure that there is a representation of people of a range of ages in staff focus groups and consultative groups providing feedback on the development and implementation of policies.

There will be transparent procedures for the selection and involvement of staff in consultation exercises.

## 4. Ensuring public access to information and services

Land Registry aims to provide information in a manner that is accessible to all.

We will continue to publish information externally through the Land Registry website, press releases and various types of literature. We feature positive images in our visual material and we will continue to feature men and women of various ages from a range of ethnic and religious backgrounds, including disabled people. We will also include the six-colour rainbow symbol, an internationally recognised symbol of LGBT-friendly organisations, where relevant and practicable – such as at customer information centres or on publications.

We will use plain English in our publications and ensure that the language is inclusive and non-discriminatory.

All publications and official material are available in English and Welsh. Documents in other languages should be requested from Customer Service. In the past we have translated some of our leaflets into five other languages. The Customer Service Manager for Land Registry will be responsible for keeping this under review to determine whether others need to be translated or whether we need to include other languages.

The Customer Service Team maintains a database of members of staff with skills in a wide range of languages, including British Sign Language (BSL), and we will monitor the extent to which we need to improve public access to our services for speakers of languages other than English. We provide funding and time for staff training in BSL.

We will review the need for other language skills and utilise telephone translation services, if required.

We will ensure that all of our national and local facilities and services are accessible for customers with a wide range of disabilities. We will continue to carry out access audits of accommodation, where required, and take action where the need to do so is identified. We will ensure consistent availability of hearing loops, BSL signers, textphones/typetalk/fax facilities and so on.

We will ensure that emergency evacuation procedures for disabled customers are established in all offices.

We will ensure that our website meets the required accessibility standards. There is an accessibility team within Information Systems to provide advice and support in relation to information technology. An accessibility policy statement will be published on our website to complement this equality scheme.

All publications and official material provided nationally or locally will be provided in formats suitable for a range of disabled customers.

Communication strategies and corporate identity will address the needs of hearing and visually impaired colleagues and customers, such as format, media, font size, colour and so on.

We will change practices, policies and procedures that make it unreasonably difficult for people with disabilities to use our services.

We will ensure that arrangements for access to our services take account of diversity in religious customs and calendars.

Our LGBT Focus Group has identified that current services, guidance and/or procedures may not be sufficiently geared to protecting transgender individuals' anonymity (and possibly their personal safety). A priority will therefore be to assess the feasibility of:

- the establishment of a small 'virtual' business unit with appropriately trained staff to deal with apparently transgender-related enquiries or applications
- amendments to procedures to clarify requirements for change-of-name applications in relation to apparently transgender-related applications.

All organisations providing services to or on behalf of Land Registry will be required to demonstrate that all reasonably practical steps are taken to ensure equality of access and equal treatment in line with our statutory duties and stated commitment to equality and diversity.

## 5. Employment

Land Registry is committed to managing diversity and valuing inclusion in everything it does. Our aim is to have an organisation that truly reflects our local communities, where all are treated with dignity and respect of their individual contribution and where all are valued, supported and included so they can fulfil their potential.

Our Managing Diversity Strategy is included in Appendix B. We have implemented a number of initiatives to eliminate discrimination and promote diversity, inclusion and equality of opportunity.

- We have established the staff focus groups identified above as additional means to obtain the views of disabled, lesbian, gay, bisexual and transgender staff.
- Our Diversity Awareness Programme includes training on a range of diversity issues. Our induction includes information about our Managing Diversity policies and our commitment to equality as set out in this equality scheme.
- Our new Performance Management (Appraisal) system was 'equality proofed' during its first year of operation and we are taking action to address the risks identified by that process. Training and written guidance were provided for personnel managers in February 2007 on diversity issues in standard setting for annual performance assessment.
- Counselling and support advisers have received training on a range of diversity issues. Within the group there is specialist expertise on disability. There is also a designated link officer for LGBT issues and counselling and support advisers can help in a variety of ways – including providing support to staff who want to inform colleagues, family or friends about their sexual orientation or to staff before, during or after the gender reassignment process. They have also implemented a programme of health promotion activities.
- A network of male and female harassment advisers have been trained to deal with diversity issues in relation to harassment, with periodic workshops and conferences to keep the network up to date. The network includes advisers from minority ethnic groups or who have a disability. Two advisers are members of the LGBT Focus Group.
- Over recent years there has been progress in increasing diversity at more senior levels. We have set diversity targets for representation of women, members of ethnic minorities and disabled staff in the Senior Civil Service (SCS) and levels below the SCS for 2008 and 2010. We review progress against these targets and examine the scope for more challenging targets for both the SCS and grades below on an annual basis.
- Human Resources will continue to encourage staff from under-represented groups – such as, disabled staff and staff from minority ethnic backgrounds – to put themselves forward for advancement. We will utilise a range of approaches and monitor progress in this area.
- We have taken steps to identify and eliminate any barriers for groups under-represented at more senior levels – such as women and people with a disability. We are establishing a mentoring scheme for ethnic minority and disabled staff in conjunction with the Future Leaders Development Programme.
- Action plans for Land Registry as a whole and for the Leicester office were developed as a result the findings of the 2004 Race Audit. In 2006, focus groups were convened with ethnic

minority staff from grades RA through RE1 in Head Office, Harrow, Coventry and Leicester during the equality proofing of our new Performance Management System and these findings will further inform action to increase race equality.

- Leaflets have been produced by local offices to publicise and inform staff about Diwali, Ramadan and other religious festivals and holy days.
- Facilities has identified a diversity champion who promotes awareness of disability issues and maintains a database on resources and best practice.
- We are signatories to the 'Two Ticks - Positive about Disability' programme.
- Local management trainers have been trained to deliver a half-day Disability Awareness Workshop, which is being rolled out in 2007.
- External consultants have carried out pay reviews in relation to gender in 2003 and 2006. Their 2006 report concluded that Land Registry has a pay structure that makes major efforts to be as equal pay compliant as possible, identifying a number of areas where there was no risk of non-compliance. Areas of moderate potential risk were identified and these are being investigated further and/or mitigating action initiated.
- Further analyses were carried out in 2006 in relation to disability, age and ethnicity and action is being taken in relation to the potential risks identified.
- The under-representation of women, disabled people and members of ethnic minorities in senior grades was noted as a factor in the pay reviews and, as indicated elsewhere in this section, positive action is being taken to address under-representation.
- We have recently established a Lesbian, Gay, Bisexual and Transgender (LGBT) website and issues are covered on our Diversity intranet LGBT pages.
- Changes have been made to the *Update of personal details* record form to take account of LGBT staff.
- Confidentiality in relation to the gender identity of Trans people: A guide for Land Registry staff is being produced in support of this Equality Scheme and is being made available on the Diversity intranet pages. Unauthorised disclosure of information on transgender people can be a criminal offence under s.22 of the Gender Recognition Act 2004. (See Appendix A3 for details of the relevant legislation.)
- *Confidentiality in relation to sexual orientation: A guide for Land Registry staff* is being produced in support of this equality scheme and is being made available on the Diversity intranet pages.
- Land Registry was the winner of the Age Positive At Work Award at the Personnel Today Awards 2005.
- We are a member of a number of organisations that provide advice and support for the implementation of our equality and diversity policies. These include the Employers' Forum on Disability, Stonewall (sexual orientation), the Employers' Forum on Age and the Employers' Forum on Belief.

## 6. Priorities for action

### 6.1 Policies and services

#### 6.1.1 Race, disability, gender, sexual orientation, religion/belief and age

Following consultation for this equality scheme, the following have been identified as priorities for action in relation to policies and services between 2007 and 2010.

- All function heads to ensure that procedures are in place to conduct and report on equality impact assessments as an essential part of the development of new policies and projects.
- Key personnel in each function to be trained on the requirements of this scheme and on procedures for carrying out equality impact assessments.
- Priorities to be established in each function for the equality impact assessment of existing policies as the basis for a published action plan for a rolling programme of assessments during 2007–2010.
- Review of templates for documents for policy and project development, papers submitted to Land Registry boards and committees, local office notices, and so on to ensure that they have been amended to include the requirement of equality impact assessments.
- Assurance Map and Internal Audit procedures to be modified to include the commitments set out in this equality scheme.
- Ensure that relevant diversity considerations are built into public procurement contracting.
- Requirements in relation to the statutory equality duties and Land Registry diversity/equality policies to be included in contracts.
- Evidence to be sought from potential contractors of their compliance with anti-discrimination legislation and commitment to equality of opportunity.
- Implications of the statutory equality duties and this equality scheme and the results of equality impact assessments to be taken into account in tender specifications.
- Land Registry to ensure that its procurement procedure is non-discriminatory and inclusive.
- Procedures to be established to monitor the users of all customer services centres.
- Monitoring questions to be added to all questionnaires for customer surveys, feedback forms, and so on.
- Information on the profile of their members to be obtained from the Law Society, Council of Mortgage Lenders and other representative groups at consultation meetings.
- Composition of user panels and other consultative groups to be reviewed to ensure that it reflects the diversity of those directly and indirectly affected by our policies and services.
- The sources of customer feedback to be reviewed in light of this equality scheme – particularly the need to evaluate the impact of our policies by race, disability, gender, sexual orientation, religion/belief and age.

## 6.1.2 Race/ethnicity

- Equality impact assessment to be carried out on Land Registry's communications strategy, methods and media with particular reference to language needs.
- Customer Service to monitor the need for languages other than English to assess whether current arrangements are meeting the needs of customers from minority ethnic groups.

## 6.1.3 Disability

- All publications, official material and office systems to be in formats suitable for a range of disabled customers and staff.
- Access audits to be carried out in every business unit, whenever major refurbishment is undertaken or at a maximum interval of three years, with a rolling programme for the implementation of recommendations.

## 6.1.4 Gender

- Equality impact assessment in relation to gender (including transgender in light of the Gender Recognition Act 2004) of arrangements for dealing with enquiries and applications.

## 6.1.5 Sexual orientation

- Review of all publicity and information documents in light of the Civil Partnership Act 2004 and update, as required.
- Equality impact assessment of policies and services in light of the Equality Act 2006, which extended anti-discrimination provisions to include the provision of goods and services and the Civil Partnership Act 2004.

## 6.1.6 Religion or belief

- Extend monitoring of service provision to include a question on religion or belief to provide data for equality impact assessment for this diversity strand.

## 6.1.7 Age

- Ensure that all consultative groups include a range of ages to ensure that we obtain feedback on the actual or potential impact of our policies and practices on grounds of age.

## 6.2 Employment

Following consultation with our staff, the following have been identified as priorities for action in relation to employment for the implementation of this scheme between 2007 and 2010.

## 6.2.1 Race, disability, gender, sexual orientation, religion/belief and age

- Full equality impact assessment of proposed changes to the organisation of human resources provision to ensure that there is no adverse impact on Land Registry's ability to promote equality and diversity.
- Full equality impact assessment of the new HR Advance systems to ensure that there is no actual/potential adverse impact against any group(s) of staff.
- Diversity issues to be embedded in the Organisational Blueprint on the future of Land Registry – through involvement of and consultation with diverse groups of employees and equality impact assessment in planning and decision-making.
- Full equality impact assessment of all decisions in relation to office closures, mergers and/or reorganisation and changes to working arrangements.
- A diversity champion to be identified and publicised in each office to act as a resource and to promote these issues locally.
- Review training provision to ensure that training methods and arrangements take account of differences in the training needs and learning styles of staff resulting from diversity issues.
- All training material to be reviewed to ensure that due reference is made to the duties and policies covered by this equality scheme.
- Monitoring of the impact of diversity training for managers.
- Monitoring data on access to formally and informally assigned 'development opportunities' to be collated from local offices and analysed by diversity strands – to increase fairness, consistency and transparency.
- Training for managers should include explicit reference to diversity issues in the identification and provision of development opportunities for staff.
- Review feedback procedures following non-selection for vacancies or promotion as part of the structures to support career development.
- Review pattern of applications and take up of opportunities in the Future Leaders Development Programme by women to identify and address any barriers to equality of opportunity.

## 6.2.2 Race/ethnicity

- Positive action to increase the representation of black and minority ethnic groups in the Senior Civil Service to include opportunities for ethnic minority staff in lower grades to gain a greater insight into assessment centre procedures and into the requirements at senior levels (such as through mentoring and shadowing).
- Priority to be given to positive action to address the development needs of long-serving ethnic minority staff who are over-represented in the lowest grades (RA and RO).

- Equality proofing and retrospective evaluation of all assessment arrangements and methods for selection and promotion of staff to eliminate any actual/potential direct or indirect racial discrimination.
- Ensure that enough ethnic minority people are trained to participate in all recruitment and promotion boards and assessment centres (including people from outside Land Registry, if necessary).
- Priority to be given to monitoring access to formally and informally arranged 'development opportunities' by ethnicity to ensure equality of opportunity in local offices for activities that prepare junior staff for work at higher grades.
- Monitoring of access to training by ethnicity to take account of the timing of the training to ensure that there is equality of access to early training opportunities.
- Future diversity training to explicitly address potential organisational cultural barriers to racial equality in the workplace.
- Action to inform staff and increase confidence in the procedure in order to fill the gaps in our ethnic monitoring database.

## 6.2.3 Disability

### **Essential**

- Regularly reviewed and updated personal emergency evacuation plans (PEEPs) should be in place to facilitate the full participation of disabled staff in all aspects of Land Registry's work and mobility between offices.
- Improved disabled staff representation and better channels of communication between disabled and non-disabled staff and management.
- Space optimisation activities to take full account of the needs of disabled staff.
- Environmental guidelines to be disability equality proofed and kept under review to ensure that disability issues are addressed.
- All Land Registry websites to meet the required accessibility standards.
- Monitoring and addressing any adverse impact against disabled staff in:
  - sickness absence and referral policies
  - access to Land Registration Qualification (LRQ) and Royal Institution of Chartered Surveyors (RICS) training, materials and delivery
  - access to Future Leaders Development Programme
  - promotion and career progression
  - access and special facilities provided for disabled employees and mechanisms for translating reasonable adjustment requests into action.

### **High priority**

- Coordination between Facilities and HR to ensure that arrangements for disabled staff are kept under review.
- Monitor changes in external schemes such as Access to Work and amend internal policies accordingly.
- Monitoring and addressing any adverse impact on disabled staff in:
  - training and development opportunities
  - work pattern modifications
  - HR and welfare support mechanisms and structures.
- Ensure full involvement of disabled staff at all levels of leadership and accountability, including:
  - the highest level – Head Office structures and controls
  - local office areas of responsibility and structures
  - lines of communication and policy delivery between Head Office and local offices – monitoring effectiveness/understanding.

### **Medium priority**

- Monitoring and addressing any adverse impact against disabled staff in:
  - recruitment
  - Further Education funding
  - complaints of harassment and discrimination
  - retention rates.

## **6.2.4 Gender**

Following consultation with male and female staff and the Departmental Trade Union Side (DTUS) and the report of research carried out by a personnel manager, the following have been identified as priorities for action for the gender component of this equality scheme.

- A Women's Focus Group to be established to contribute to action to address the under-representation of women in certain business areas and to promote a better gender balance at senior management levels.
- Positive action to increase the representation of women in the Senior Civil Service to include opportunities for women in feeder grades to gain a greater insight into requirements at senior levels (such as through mentoring and shadowing) and into assessment centre procedures.
- A full Gender Equality Impact Assessment to be conducted on Land Registry's approaches to career management and development paths.
- Policy on job descriptions and person specifications for senior level jobs to be reviewed to establish the principle that all posts should be considered suitable for flexible working and/or job sharing unless there is a written and agreed case for a post being restricted to full-time working.

- Priority to be given to full Gender Equality Impact Assessment of proposed changes to arrangements for flexible working patterns (core hours, band width and so on).
- Monitor decisions on applications for flexible working patterns to ensure that there is equal access to these arrangements for men and women who wish to work in this way.
- Equality impact assessment and appropriate positive action to be taken to address the under-representation of women in functions such as IT and Facilities.
- Particular attention to be paid to the monitoring of promotion by working pattern and action taken to address any apparent adverse impact against part-time staff.
- Procedures to be established to facilitate the identification of partners for job-sharing from among Land Registry staff.
- Future diversity training to address potential organisational cultural barriers to gender equality in the workplace.
- All HR policies to be reviewed in light of the gender reassignment provisions of the Sex Discrimination Act and the Gender Recognition Act 2004 and updated, where required.
- Policy and publicity documents as well as training on harassment and bullying to be reviewed to ensure that they include references to the unacceptability of comments, harassment and victimisation on grounds of perceived gender identity and gender reassignment.
- Land Registry to subscribe to a:gender, the Whitehall-recognised network for transsexual, transgender and intersex staff in all government departments and agencies, which also acts in an advisory capacity to HR departments across the Civil Service.
- Priority to be given to conducting a survey of attitudes to transgender issues in the workplace (based on the ACAS audit tool) in the first year of this equality scheme to provide baseline data against which subsequent progress can be measured.
- Written guidance on the management of transgender issues in the workplace to be published on the intranet to complement this equality scheme, supported by talks or seminars to increase awareness and understanding.
- Personnel managers to ensure that any transgender issues are picked up in exit interviews and data from local offices to be collated by the HR Diversity Team, who should take action on any actual/potential discrimination identified.

## 6.2.5 Sexual orientation

Following consultation with the LGBT Focus Group and DTUS, the following have been identified as priorities for the implementation of the sexual orientation component of this equality scheme in relation to employment between 2007 and 2010.

- All HR policies to be reviewed in light of the Employment Equality (Sexual Orientation) Regulations 2003 and Civil Partnership Act 2004 and updated, where required.
- All Land Registry information documents to be reviewed and amended to include civil partnerships, where appropriate.

- Policy and publicity documents as well as training on harassment and bullying to be reviewed to ensure they include references to the unacceptability of homophobic comments and harassment.
- General management training to be reviewed to ensure the content promotes awareness, positive attitudes and equality in relation to lesbian, gay and bisexual employees.
- All decisions about office closures, mergers, location and relocation to undergo an equality impact assessment in relation to lesbian, gay and bisexual staff.
- Personnel managers to ensure that any LGB issues are picked up in exit interviews and data from local offices to be collated by the HR Diversity Team, who should take action on any actual/potential discrimination identified.
- Priority to be given to conducting a survey of attitudes to LGB issues in the workplace (based on the ACAS audit tool) in the first year of this equality scheme to provide baseline data against which subsequent progress can be measured.

## 6.2.6 Religion/belief

The Religion and Belief Regulations cover recruitment, terms and conditions, promotions, transfers, dismissals and vocational training. Following consultation with staff and DTUS, the following priorities have been identified.

- Equality impact assessment of office relocation decisions to include assessment of impact on staff of different religions or beliefs (or none).
- Religious focus groups to be convened as part of consultation on employment policies and practices as well as for the annual reviews of the implementation of this equality scheme.
- All written guidance on HR matters to be reviewed in light of this legislation and updated, if required.
- In the review of HR policies, priority to be given to:
  - policies concerning arrangements for taking leave to take account of diversity in religious festivals and observance
  - travel policies, including arrangements for claiming subsistence to take account of different dietary requirements.
- Management training to be reviewed to ensure the implications of the Employment Equality (Religion and Belief) Regulations 2003 and the Equality Act 2006 are taken into account.

## 6.2.7 Age

The Age Regulations cover recruitment, terms and conditions, promotions, transfers, dismissals and vocational training. Following consultation with staff and DTUS, the following priorities have been identified.

- The operation of the default retirement age of 65 to be reviewed on an annual basis in advance of the statutory review in 2011.
- High priority to be given to equality impact assessment of policies that restrict opportunities to work past 65 to assess their objective justifiability.
- High priority to be given to monitoring decision-making in relation to requests to work beyond the Land Registry retirement age.
- Land Registry to develop a positive programme to prepare staff for the new procedures around retirement, with individual planning for retirement.
- Land Registry to redefine approved early retirement and reinstate early retirement procedures, compliant with the Employment Equality (Age) Regulations 2006 and guidance from Cabinet Office.
- Focus groups comprising different age groups to be convened as part of consultation on employment policies and practices as well as for the annual reviews of the implementation of this equality scheme.

## 7. Monitoring

### 7.1 Policies and services

All Land Registry policies and services should be monitored for their impact on the public. Where policies are found to have an adverse impact on a particular group – defined by ethnicity, disability, gender, religion/belief, sexual orientation or age – we will consider how to alter it so that the original objectives can be met without an adverse impact.

Policy teams are responsible for establishing systems that provide equality monitoring data. Monitoring should be built in as an intrinsic and regular feature of Land Registry policies and services. Senior managers will be responsible for ensuring that equality monitoring is integral to the development of new policies.

We will use information from the feedback and consultation processes outlined in section 3.2 combined with census data, where appropriate, to monitor the impact of our policies and services on the public in relation to race, disability and gender equality.

In monitoring disability, we aim to be able to identify disabled staff and customers without being unacceptably intrusive.

We are developing new procedures for monitoring sexual orientation and transgender and anyone intending to monitor on these issues should seek the advice of the Diversity Team, who may consult the LGBT Focus Group.

We will continue to report annually on the results of our monitoring.

## 7.2 Employment

We will continue to monitor employment processes by race, disability and gender and analyse the data for:

- staff in post – total, by job band and by business unit
- recruitment at each stage of the process
- selection and promotion
- Future Leaders Development Programme
- training – including access to LRQ and RICS qualifications
- grievances
- performance assessment (appraisal)
- dismissals and other reasons for leaving.

These will now be monitored and analysed in relation to ethnicity, disability, gender, religion/belief and age.

We intend to re-survey our staff in relation to disability with the aim of achieving a minimum response rate of 90 per cent in all offices. We aim to increase the declaration of disability from 6 to 10 per cent.

We will also re-survey in relation to ethnicity to increase the declaration of ethnic origin in the offices with the lowest response rates.

We will also survey staff on religion/belief to enable us to include this diversity strand in the analyses outlined above.

We will develop procedures for monitoring LGBT staff in line with guidance being developed with this equality scheme, based on the advice of the TUC (LGBT), specialist charities Stonewall (LGB) and Press for Change (T), and Cabinet Office.

We will also monitor the use of the 'Two Ticks' symbol to ensure that the commitments for job applicants and staff with disabilities are being observed.

We are currently working to establish improved systems to monitor:

- disciplinary action
- use of the Counselling & Support Services
- composition of recruitment and selection boards
- access to 'development opportunities'.

The following have also been identified as priorities for monitoring by race, disability, gender, religion/belief, sexual orientation and age from consultation with staff and DTUS.

- Sickness absence and referrals.
- Access to special facilities and reasonable adjustments for disabled employees.
- Application and decisions on working pattern modifications.
- Applications and decisions for special leave.
- Applications and decisions in relation to post-65 working.

In monitoring the impact of our human resources policies and practices, we aim to evaluate not only our national policies, but also the impact of local decision-making on different groups of staff.

We will ensure that the confidentiality of personal information on staff is respected in the collection, analysis and reporting of monitoring data.

## 8. Publishing the results of assessments and consultation

We will ensure that the results of our assessments and consultation on policies are published in accessible and user-friendly formats.

This will include:

- the results of screening for equality impact
- the results of the full equality impact assessments of policies, where required
- analysis of monitoring data.

The results of equality impact assessments – screening and full assessments – will be available internally and externally.

- Summaries of screening and/or assessments should be included in all policy papers.
- Evidence from screening or full assessments will be required for the approval of new policies and projects.
- Progress in the assessment of functions, policies and practices will be included in quarterly reports to the Land Registry Board.

Monitoring data will be analysed and published annually in a report on the implementation of this equality scheme, which will be available on our website. A commentary will be included to put them in context as well as to identify any trends and the strengths and weaknesses of current performance.

## 9. Training

Land Registry is committed to ensuring that staff are properly trained so they can make diversity issues central to their work, irrespective of their areas of responsibility. We will ensure that information about our statutory duties under the Race Relations (Amendment) Act 2000, the Disability Discrimination Act 2005 and the Equality Act 2006 as well as the provisions of anti-discrimination legislation in relation to religion/belief, sexual orientation and age is included in all current and future diversity training courses.

Specific training on the statutory duties will be provided for those who have particular responsibilities in relation to these duties, such as those with project management responsibilities, Customer Service, Facilities, Internal Audit and so on.

The *Managing diversity* and *valuing inclusion* training has been provided through an e-learning package combined with a half-day workshop. This course is designed to increase participants' understanding of diversity and therefore supports our objectives under the employment duties.

A new diversity training programme for senior managers has been designed to be challenging and participative.

Diversity issues are included in general management training.

A half-day Disability Awareness Workshop has been piloted. All local management trainers are delivering this workshop in 2007.

Resource material is available on the Land Registry intranet and we will continue to update the information provided in relation to each of the diversity strands. Material currently available includes the following.

- *Cultural Diversity*, a resource booklet on religious and cultural observance, belief, language and naming systems, is available in electronic form to all staff through PEARL. It has also been included on the Cabinet Office website as an example of best practice.
- *Disability – A Reference Guide*, which provides basic information and guidance on disability-related issues.
- *Accessible Meetings, Training and Events*, an introductory guide on accessibility with particular reference to mobility, sight, hearing, speech and learning disabilities, mental health problems and disfigurement.
- *The Disability Communication Guide* (published by [www.employers-forum.co.uk](http://www.employers-forum.co.uk)) and the *Welcoming Disabled Customers* booklet are available in customer information centres.
- *HIV – A Reference Guide*, available in PEARL.
- *Diversity and Equal Opportunity – Religion and Sexuality* booklet, which is being updated to accompany this equality scheme.
- *Confidentiality in relation to the gender identity of trans people: a guide for Land Registry staff*, which will be produced to accompany this equality scheme.
- *Confidentiality in relation to sexual orientation: A guide for Land Registry staff*, which is being produced in support of this equality scheme and is being made available on the Diversity intranet pages.

## 10. Publication

We will publish our Single Equality Scheme on our website. The scheme is available for downloading in PDF format.

To make the information we publish accessible, we will make our documents available in large print, tape, Braille and alternative languages on request.

With offices throughout England and Wales, we are able to provide wide access to our services. These are accessible through:

- our website
- email
- letter
- face-to-face meetings, by appointment, with BSL interpreters present when requested
- telephone, including text phone
- written guidance, publications and factsheets, available on request, and in the formats mentioned above.

We will publish a report on our progress towards implementing our scheme, including the results of any assessments and consultations, on our website in March 2008.

If you require this document in an alternative format please contact Abigail Skinner on:

Tel: 020 7166 4854

Fax: 020 7166 4258

Textphone or minicom: 0800 01535  
(You must have compatible equipment to use this number; an ordinary telephone will not work.)

Email: [abigail.skinner@landregistry.gsi.gov.uk](mailto:abigail.skinner@landregistry.gsi.gov.uk)

## 11. Complaints

What can members of the public and staff do if you feel Land Registry has failed to comply with this equality scheme?

### 11.1 Members of the public

If you feel that you have been affected by a failure by Land Registry to comply with its equality scheme, you should in the first instance contact Denise Reynolds, Customer Service Manager for Land Registry, at Head Office.

Denise Reynolds  
Customer Service Manager  
Land Registry  
32 Lincoln's Inn Fields  
London WC2A 3PH

Tel: 020 7331 8365  
Email: [denise.reynolds@landregistry.gsi.gov.uk](mailto:denise.reynolds@landregistry.gsi.gov.uk)

### 11.2 Staff

If you feel that you have been affected by a failure by Land Registry to comply with its equality scheme, you should in the first instance contact the Head of Diversity in HR Group at Land Registry Head Office.

Julie Dennis  
Head of Diversity  
Land Registry  
32 Lincoln's Inn Fields  
London WC2A 3PH

Tel: 020 7166 4463  
Email: [julie.dennis@landregistry.gsi.gov.uk](mailto:julie.dennis@landregistry.gsi.gov.uk)

We will acknowledge receipt of the complaint and will ensure that an internal investigation is carried out.

A substantive reply to the complaint will be provided in due course.

We will maintain a register of complaints and will regularly review the complaints procedure to ensure that it is clear, open and fair.



# Appendix A — SES Action Plan 2007 - 2010

Action	Responsibility	By when/comments
<b>1 Establish priorities and procedures</b>		
1.1 Allocate responsibilities and establish procedures to conduct and report on equality impact assessments. R, D, G, SO, R/B, A	All function heads	November 2007
1.2 Identify and train key personnel on equality impact assessment (EIA). R, D, G, SO, R/B, A	All function heads and Diversity Team	December 2007
1.3 Produce prioritised list of existing policies for EIA in action plan 2007–2010 *. R, D, G, SO, R/B, A	All function heads	December 2007
1.4 Revise templates for project documents, board papers, and so on. R, D, G, SO, R/B, A	All function heads	December 2007
1.5 Modify assurance map and internal audit procedures. R, D, G, SO, R/B, A	Head of Internal Audit	December 2007
1.6 Publicise identity and role of diversity champion in each office. R, D, G, SO, R/B, A	Personnel managers	December 2007 Review annually

\* With procedures established, action should then be taken within each function to implement action plans based on this list of their policies prioritised according to their relevance to equality in relation to race, disability, gender, sexual orientation, religion/belief and age.

Action	Responsibility	By when/comments
<b>2 Assess impact of policies and practices</b>		
2.1 Equality impact assessment of all new functions and policies. R, D, G, SO, R/B, A	Programme and project managers	During policy development
2.2 Equality impact assessment of all current functions and policies. R, D, G, SO, R/B, A	Programme and project managers	Rolling programme according to priorities established by action 1.3

The actions listed below have been identified as priorities from consultation during the development of this equality scheme (see section 6) and should be incorporated into the action plans of the appropriate functions.

## Key to most relevant issues

R = Race  
SO = Sexual orientation  
D = Disability  
R/B = Religion/belief  
G = Gender  
A = Age

Action	Responsibility	By when/comments
<b>3 Promote equality in plans for the future of Land Registry</b>		
3.1 Diversity issues to be embedded in all plans for Land Registry – with involvement, consultation and impact assessment. R, D, G, SO, R/B, A	Policy & Planning	At all times
3.2 Equality impact assessment of proposals for office closures, mergers and/or reorganisation. R, D, G, SO, R/B, A	Policy & Planning	At all times
3.3 Equality impact assessment of proposed changes to working arrangements. R, D, G, SO, R/B, A	HR Policy	During development
3.4 Equality impact assessment of proposed changes to arrangements for flexible working arrangements. R, D, G, SO, R/B, A	HR Policy	During development
<b>4 Obtain feedback on impact of policies from customers</b>		
4.1 Review sources of customer feedback. R, D, G, SO, R/B, A	Customer Service Manager	November 2007
4.2 Monitoring questions to be added to questionnaires for customer surveys, feedback forms and so on. R, D, G, SO, R/B, A	Customer Service Manager	New forms: immediately. Existing forms: next printing opportunity
4.3 Establish procedures to monitor users of customer information centres. R, D, G, R/B, A	Customer Service Manager	Commence pilot by July 2007 Roll out January 2008
4.4 Obtain information on profile of members from Law Society, Council of Mortgage Lenders and so on. R, D, G, SO, R/B, A	Customer Service Manager	2007 – before next consultation exercise
4.5 Review and revise, if necessary, composition of user panels and consultative groups. R, D, G, SO, R/B, A	Customer Service Manager	December 2007

#### Key to most relevant issues

R = Race

SO = Sexual orientation

D = Disability

R/B = Religion/belief

G = Gender

A = Age

Action	Responsibility	By when/comments
<b>5 Obtain feedback on impact of policies from employees</b>		
5.1 Identify disability focus group members in all offices. D	Personnel managers to assist disability focus group	September 2007
5.2 Establish religious focus group for annual review of equality scheme. R/B	HR Policy	Annually from April 2008
5.3 Age focus groups to be convened as part of annual review of this equality scheme. A	HR Policy	Annually from April 2008
5.4 Collate information from exit interviews in local offices and monitor against six diversity strands. R, D, G, SO, R/B, A	Personnel managers/ HR	Annually from April 2008
<b>6 Ensure public access to information and services</b>		
6.1 Ensure that publications and official material are produced in suitable formats for disabled customers and staff. D	Marketing Services/Internal Communication	All new material Keep under review
6.2 All websites to meet required accessibility standards. D	Head of Information Systems	Report on current situation by November 2007
6.3 Access audits with major refurbishment or after three years. D	Facilities Diversity Champion	Rolling programme
6.4 Provide visitor information concerning access for all offices. D	Customer Service	September 2007
6.5 Keep personal emergency evacuation plans for disabled customers under review. D	Customer Service/ Facilities	Keep under review

#### Key to most relevant issues

R = Race

SO = Sexual orientation

D = Disability

R/B = Religion/belief

G = Gender

A = Age

Action	Responsibility	By when/comments
6.6 Transgender equality impact assess procedures for dealing with enquiries and applications. G	Customer Service	December 2007
6.7 Equality impact assess policies and services in light of extension of legislation on sexual orientation discrimination to good and services. SO	All function heads	New policies: in development Existing policies: in prioritised rolling programme
<b>7 Equality impact assessment of communications</b>		
7.1 Ensure communications strategy, methods and media meet language needs, including BSL. R, D	Marketing Services/ Internal Communications	Commence monitoring of language use from July 2007 Review language needs and implement by/from March 2008
7.2 Ensure publications, office material and office systems are in formats suitable for a range of disabled customers and staff. D	Marketing Services/ Internal Communication	All new material Keep under review
7.3 Review and update all publicity and information documents in light of Civil Partnership Act 2004. SO	Registration Change	December 2007
<b>8 Promote equality in procurement</b>		
8.1 Amend standard documents for tender invitations and contracts to include equality scheme commitments. R, D, G, SO, R/B, A	Procurement	September 2007
8.2 Equality impact assessment of procurement procedure. R, D, G, SO, R/B, A	Procurement	September 2007
8.3 Promote diversity in suppliers through public procurement procedures. R, D, G, SO. R/B, A	Procurement	Keep under review

#### Key to most relevant issues

R = Race

SO = Sexual orientation

D = Disability

R/B = Religion/belief

G = Gender

A = Age

Action	Responsibility	By when/comments
<b>9 Increase diversity at senior levels</b>		
9.1 Establish and promote mentoring by/ work-shadowing of managers at senior levels for ethnic minority, disabled and female staff. R, D, G,	HR Policy	March 2008
9.2 Equality impact assessment of approaches to career management and development R, D, G	HR Policy	March 2008/March 2009
9.3 Monitor job description/person specifications for senior roles for availability of flexible working arrangements. D, G	Function heads/HR	Ongoing
<b>10 Increase representation of minority ethnic groups at senior levels</b>		
10.1 Identify and assess development needs of ethnic minority staff over-represented in RA/RO grades. R	HR Policy	Assess and initiate action by March 2008
10.2 Race equality-proofing and retrospective evaluation of recruitment/promotion exercises. R	HR Policy	All recruitment and promotion exercises
10.3 People from minority ethnic groups to be trained to participate in promotion boards and assessment centres. R	HR Policy	All recruitment and promotion exercises
<b>11 Promote the involvement of disabled people</b>		
11.1 Ensure involvement of disabled staff at all levels of national and local office leadership. D	HR: Personnel managers to monitor/ advise	Keep under review

#### Key to most relevant issues

R = Race

SO = Sexual orientation

D = Disability

R/B = Religion/belief

G = Gender

A = Age

Action	Responsibility	By when/comments
<b>12 Ensure accommodation meets needs of disabled staff</b>		
12.1 Environmental guidelines to be disability equality-proofed and kept under review. D	Facilities/HR Policy	September 2007, then keep under review
12.2 Space optimisation activities to take account of needs of disabled staff. D	Facilities/HR Policy	Pilot project and subsequent activities
12.3 Regularly reviewed Personal Emergency Evacuation Plans (PEEPs) for disabled staff. D	Facilities Manager	September 2007 and annual reviews
12.4 Monitor external schemes (eg Access to Work) and amend internal policies accordingly. D	HR Policy	Keep under review
<b>13 Improve gender balance at senior levels</b>		
13.1 Establish a women's focus group. G	HR Policy	April 2008
13.2 Establish arrangements to facilitate identification of job-sharing partners. G	HR Policy	Keep under review
13.3 Identify causes and take positive action to address under-representation in areas such as IT and Facilities. G	Directors of IT and Facilities	Identify causes by April 2008 Initiate action by April 2009
13.4 Monitor promotion by working pattern. G	HR Policy	Ongoing

#### Key to most relevant issues

R = Race

SO = Sexual orientation

D = Disability

R/B = Religion/belief

G = Gender

A = Age

Action	Responsibility	By when/comments
<b>14 Promote equality for transgender/transsexual individuals</b>		
14.1 Publish written guidance on trans issues in the workplace. G	HR Policy	August 2007
14.2 Land Registry to subscribe to a: gender. G	HR Policy	September 2007
14.3 Attitude survey on transgender equality in the workplace. G	HR Policy	April 2008
<b>15 Promote equality for lesbian, gay and bisexual staff</b>		
15.1 Attitude survey on LGB equality in the workplace. SO	HR Policy	April 2008
<b>16 Equality impact assessment in Human Resources (HR)</b>		
16.1 EIA of proposed changes to organisation to HR. R, D, G, SO, R/B, A	Director of HR	During policy development
16.2 EIA of new HR Advance systems. R, D, G, SO, R/B, A	Director of HR	During development
16.3 EIA of policies affecting operation of default retirement age. A	HR Policy	High priority
16.4 Review operation of default retirement age. A	HR Policy	Annually from April 2008
16.5 Redefine/reinstate Approved Early Retirement. A	HR Policy	When Cabinet Office guidance is available
16.6 Develop programme to prepare staff affected by new retirement procedures. A	HR Policy	April 2008

#### Key to most relevant issues

R = Race

SO = Sexual orientation

D = Disability

R/B = Religion/belief

G = Gender

A = Age

Action	Responsibility	By when/comments
<b>17 Ensure that training provision promotes equality/diversity</b>		
17.1 Ensure that training methods and arrangements take account of diverse needs, learning styles and so on. R, D, G, A	HR Policy	All new training provision Existing provision by March 2008 Keep under review
17.2 Ensure that equality scheme commitments in relation to all six diversity strands are included in all training. R, D, G, SO, R/B, A	HR Policy	Rolling prioritised programme of review
17.3 Future diversity training to explicitly address organisational cultural barriers to equality. R, D, G, SO, R/B, A	HR Policy	New or updated training courses
17.4 Monitor access to early training opportunities by ethnicity. R	HR Policy	April 2008
17.5 Policy and publicity documents and training on harassment and bullying to be updated to include transgender issues and sexual orientation. G, SO	HR Policy	Documents: December 2007 All training courses
17.6 Evaluate the impact of diversity training for managers. R, D, G, SO, R/B, A	HR Policy	Establish procedure by April 2008

#### Key to most relevant issues

R = Race

SO = Sexual orientation

D = Disability

R/B = Religion/belief

G = Gender

A = Age

Action	Responsibility	By when/comments
<b>18 Extend equality monitoring</b>		
18.1 Consult on monitoring of sexual orientation and gender identity. SO, G	HR Policy	On publication of Cabinet Office guidelines
18.2 Survey to obtain information on religion/belief. R/B	HR Policy	December 2007
18.3 Resurvey to improve records on disability and ethnicity. R, D	HR Policy	December 2007
18.4 Monitor use of Counselling & Support Services. R, D, G, SO, R/B, A.	HR Policy	Annually from April 2008
18.5 Monitor composition of recruitment and selection panels. R, D, G	HR Policy	Annually from April 2008
18.6 Monitor access to 'development opportunities'. R, D, G, SO, R/B, A.	HR Policy	Annually from April 2008
18.7 Monitor sickness absence and referrals. R, D, G, SO, R/B, A.	HR Policy	Annually from April 2008
18.8 Monitor access to special facilities and reasonable adjustments, including working pattern modifications. R, D, G, SO, R/B, A.	HR Policy	Annually from April 2008

#### Key to most relevant issues

R = Race

SO = Sexual orientation

D = Disability

R/B = Religion/belief

G = Gender

A = Age



# Appendix B — The legal framework

## B1 The Race Equality Duty

The Race Relations (Amendment) Act 2000 (RRAA) came into force in April 2001, placing a statutory duty on public authorities to have due regard to the need to eliminate unlawful racial discrimination and to promote good relations between people of different racial groups.

The RRAA imposes both general and specific duties on most public employers. Specific duties cover policy, service delivery and employment.

The general statutory duty has three parts.

- Eliminating unlawful racial discrimination.
- Promoting equality of opportunity.
- Promoting good relations between people of different racial groups.

Specific employment duties are to:

- monitor by ethnicity staff in post and applicants for jobs, promotion and training
- monitor by ethnicity and analyse grievances, disciplinary action, performance appraisal, dismissals and other reasons for leaving
- publish annually the results of our ethnic monitoring.

There is a specific duty to publish a Race Equality Scheme.

The following four principles were set out in the Commission for Racial Equality (CRE) Code of Practice.

- Promoting race equality is obligatory for public bodies – ie they should mainstream race equality.
- Public bodies must meet the duty to promote race equality in all relevant functions.
- The weight given to race equality should be proportionate to its relevance to particular functions.
- The elements of the general statutory duty are complementary, which means that they are all necessary to meet the whole duty.

### B1.1 Racial discrimination

Racial discrimination is defined in the Race Relations Act 1976 and the Race Relations Act (Amendment) Regulations 2003.

It is unlawful to discriminate on racial grounds in employment and education, in the provision of goods, facilities and services and in the exercise of public functions. Racial grounds include race, colour, nationality or ethnic or national origins.

**Direct racial discrimination is:**

- where a person from one group is treated less favourably on racial grounds than a person from another group has been or would have been treated in similar circumstances
- some forms of racial harassment may amount to unlawful direct racial discrimination.

**Indirect racial discrimination is:**

- where an apparently non-discriminatory provision, criterion or practice, which is applied equally to everyone, puts or would put people of a particular race or ethnic or national origin at a particular disadvantage when compared with others and that provision, criterion or practice cannot be shown to be a proportionate means of achieving a legitimate aim
- where an apparently non-discriminatory requirement or condition is applied equally to everyone, but it can only be met by a considerably smaller proportion of people from a particular racial group, which is to the detriment of a person from that group because they cannot meet it, and the requirement or condition cannot be justified on non-racial grounds.

**Racial harassment is:**

where, on grounds of race or ethnic or national origin, a person engages in unwanted conduct towards another person that has the purpose or effect of violating that other person's dignity or creating an intimidating or hostile, degrading, humiliating or offensive environment for them.

**Victimisation is:**

where someone is treated less favourably than others in the same circumstances because they have complained about racial discrimination under the Race Relations Act or supported someone else who has.

## B2 The Disability Equality Duty

The Disability Discrimination Act (DDA) 2005 amended the DDA 1995 to place a statutory duty on all public authorities, when carrying out their functions, to have due regard to the need to:

- promote equality of opportunity between disabled people and other people
- eliminate discrimination that is unlawful under the Act
- eliminate harassment of disabled people that is related to their disabilities
- promote positive attitudes towards disabled people
- encourage participation by disabled people in public life
- take steps to take account of disabled people's disabilities, even where that involves treating disabled people more favourably than other people.

We will give due weight to the need to promote disability equality in proportion to its relevance to particular decisions of functions.

The general duty came into force on 4 December 2006. Land Registry published our Disability Equality Scheme on that date.

The general duty requires Land Registry not only to have due regard to disability equality when making decisions about the future, but also to take action to tackle the consequences of decisions in the past that failed to give due regard to disability equality.

The duty in relation to the provision of goods and services is 'anticipatory' in that it requires adjustments to be made in advance of individual disabled people attempting to use the service.

The definition of disabled people in the Act is a broad term and covers people with a wide range of physical and mental disabilities.

'A disabled person is someone who has a physical or mental impairment, which has a substantial and long-term adverse effect on his/her ability to carry out normal day-to-day activities'.

The social causes of exclusion are often experienced in common by people with a wide range of impairments, but in some instances distinct barriers will arise for groups with a particular type of disability. As well as having different impairments, disabled people will also have differing experiences depending on their gender, age, sexuality, religion and ethnicity. We will need to give consideration to whether particular groups of disabled people are experiencing particular disadvantages.

## B2.1 Disability discrimination

### B2.1.1 Employment

The Disability Discrimination Acts identify four forms of discrimination as well as harassment in relation to employment.

Direct discrimination.

- Where, on the ground of their disability, a disabled person is treated less favourably than a person not having that particular disability is (or would be) treated in the same or comparable circumstances.
- There can be no justification for direct discrimination.

Failure to comply with a duty to make reasonable adjustments.

- Employers have a duty to make reasonable adjustments in relation to disabled people, ie to take such steps as is reasonable for them to take to prevent disadvantage to individual disabled people arising from any employment provision, practice or premises and a failure to do so amounts to unlawful discrimination.
- There can be no justification for a failure to make reasonable adjustments.

Disability-related discrimination.

- This is similar to direct discrimination in that a disabled person receives less favourable treatment than the comparator. In this case, the less favourable treatment is for a reason that is

related to the disability, but is not the disability itself, and the employer cannot show that the treatment is justified.

- This is a wider class of less favourable treatment which, although not amounting to direct discrimination, is nevertheless unlawful.

Victimisation.

- It is unlawful to treat someone less favourably than another person in comparable circumstances has been treated because they have (or are thought to have) made or supported an allegation of unlawful disability discrimination.

The Act says that harassment occurs:

- where for a reason that relates to a person's disability, another person engages in unwanted conduct that has the purpose or effect of violating the disabled person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

## B2.1.2 Service provision

The Disability Discrimination Acts identify two forms of discrimination in relation to service providers.

- When a service provider treats a disabled person less favourably – for a reason relating to the disabled person's disability – than they treat (or would treat) others to whom that reason does not apply and they cannot show that the treatment is justified.
- When a service provider fails to comply with a duty to make reasonable adjustments in relation to the disabled person and cannot show that the failure is justified.

## B3 The Gender Equality Duty

The Equality Act 2006 amended the Sex Discrimination Act (SDA) 1975 to place a statutory duty on all public authorities, when carrying out their functions, to have due regard to the need:

- to eliminate unlawful sex discrimination and harassment
- to promote equality of opportunity between women and men.

Specific duties require Land Registry to gather information on the effect of its policies and practices on women and men and, in particular:

- the extent to which we promote equality between male and female staff
- the extent to which the services we provide and the functions we perform take account of the needs of women and men.

The general and specific duties came into effect on 6 April 2007.

The weight that Land Registry gives to gender equality should be proportionate to its relevance to a particular function – as is the case for the statutory duties in relation to race and disability.

This is a form of legally enforceable 'gender mainstreaming', ie systematically identifying and addressing gender equality issues throughout policy development, service design and delivery, monitoring and employment.

Unlawful discrimination under the SDA and the general duty means:

- direct or indirect discrimination against women and men in employment and education, in goods, facilities and services and in the exercise of public functions
- harassment, sexual harassment and discrimination on the grounds of pregnancy and maternity leave
- direct or indirect discrimination in the employment field on the grounds that a person is married or a civil partner
- discrimination on grounds of gender reassignment in employment and vocational training
- direct or indirect discrimination against anyone who intends to or is undergoing or has undergone gender reassignment.

Women and men may experience different forms of disadvantage depending on their age, ethnicity, colour, religion and belief, sexual orientation, marital or civil partnership status and whether or not they have a disability.

### B3.1 Equal pay

The general duty includes a requirement to have due regard to the need to eliminate discrimination that is unlawful under the Equal Pay Act. The specific duties require public authorities, when setting their overall objectives, to:

‘consider the need to have objectives that address the causes of any differences between the pay of men and women that are related to their sex’.

Public authorities must be able to demonstrate in their equality scheme that they have considered the need to have objectives that address any gender pay gap.

### B3.2 Unlawful discrimination against transgender individuals

The Sex Discrimination Act 1975 prohibits discrimination, harassment or victimisation against anyone who intends to or is undergoing or has undergone gender reassignment.

The Gender Recognition Act 2004 means that people who have made the transition to their acquired gender are afforded all the rights and responsibilities appropriate to that gender. Under s.22 of this Act, unauthorised disclosure of a trans individual's status may be a criminal offence. This information is also covered by the provisions in relation to ‘sensitive data’ in the Data Protection Act 1988 and the confidentiality provisions of the Asylum & Immigration Act 1996.

From December 2007, the Sex Discrimination Act will be amended to implement the Goods and Services Directive 2004/113 and discrimination, including harassment, on the grounds of gender reassignment will then be expressly prohibited in goods and services.

There is therefore a legal requirement to eliminate discrimination, harassment and victimisation on grounds of gender identity and gender reassignment. Although there is as yet no legal requirement under the Gender Equality Duty for public authorities to take further action to promote equality between transsexuals and other people, Land Registry has included these groups in our commitment to promoting gender equality in this equality scheme.

## B4 Sexual orientation

In the regulations, sexual orientation is defined as:

- lesbians and gay men: orientation towards people of the same sex
- heterosexual: orientation towards people of the opposite sex
- bisexual: orientation towards people of the same sex and the opposite sex

From 1 December 2003, when the Employment Equality (Sexual Orientation) Regulations came into force, it became unlawful to directly or indirectly discriminate against, harass or victimise individuals because of their actual or perceived sexual orientation in employment and vocational training. This includes recruitment, terms and conditions, promotion, transfers, dismissal and training.

The Equality Act 2006 extended the prohibition on discrimination on grounds of sexual orientation to cover the provision of goods, facilities and services, education, the use and disposal of premises, and the exercise of public functions as well as the existing prohibition in relation to employment and vocational training.

There are no statutory general or specific equality duties in relation to this diversity strand, but this Land Registry Single Equality Scheme includes the commitment, when carrying out its functions, to have due regard to the:

- elimination of direct or indirect discrimination, harassment and victimisation on grounds of sexual orientation
- promotion of equality of opportunity for lesbian, gay and bisexual people.

The weight that Land Registry gives to equality in relation to sexual orientation should be proportionate to its relevance to a particular function, as is the case for the statutory duties in relation to race, disability and gender.

The Civil Partnership Act 2004 came into force in December 2005. A civil partnership is a legal relationship that can be registered by two people of the same sex. It gives same-sex couples the ability to obtain legal recognition for their relationship.

Civil partners have equal treatment in a wide range of legal matters with married couples, including:

- employment benefits
- most state and occupational pension benefits
- income related benefits, tax credits and child support
- recognition under intestacy rules.

Persons who are civil partners get equal treatment with married people under the Sex Discrimination Act (see Appendix A3).

## B5 Religion or belief

The Employment Equality (Religion and Belief) Regulations 2003 and the Equality Act 2006 prohibit direct and indirect discrimination, harassment or victimisation on grounds of religion or belief in employment and vocational training. This means that it is unlawful to discriminate against a person on the grounds of any religion, religious belief, philosophical belief or perceived religion, religious or philosophical belief. The regulations also cover those without particular religious or philosophical beliefs.

Areas covered by the regulations include recruitment, terms and conditions, promotion, transfers, dismissal and vocational training.

The Equality Act 2006 extended the prohibition on discrimination on grounds of religion or belief to cover the provision of goods, facilities and services, education, the use and disposal of premises and the exercise of public functions as well as the existing prohibition in relation to employment and vocational training.

There are no statutory general or specific equality duties in relation to this diversity strand, but the Land Registry Single Equality Scheme includes the commitment, when carrying out its functions, to have due regard to the:

- elimination of direct or indirect discrimination, harassment and victimisation on grounds of religion or belief (ie because they follow, are perceived to follow, or do not follow a particular (or any) religion or belief)
- promotion of equality of opportunity between people of different religions or beliefs or people with no religious allegiance.

We need to consider whether any policies, rules or procedures indirectly discriminate against staff or members of the public of particular religions or beliefs and, if so, what reasonable changes can be made.

There is no legal requirement to monitor religion or belief, but such monitoring helps organisations to ensure that their policies are working to the benefit of all concerned and to test that there is no direct or indirect discrimination on grounds of religion or belief. It may also help us to understand employees' needs and to provide appropriate facilities.

The weight that Land Registry gives to religious equality should be proportionate to its relevance to a particular function, as is the case for the statutory duties in relation to race, disability and gender.

NB: Guidance on commonly practised religions is included in the Land Registry resource booklet *Cultural Diversity*, which is available in electronic form to all staff through PEARL.

## B6 Age

Employment Equality (Age) Regulations 2006 came into force on 1 October 2006. These prohibit direct and indirect discrimination, harassment and victimisation on the grounds of age in employment or vocational training. The regulations cover recruitment, terms and conditions, promotions, transfers, dismissals and training.

There are no statutory general or specific equality duties in relation to this diversity strand, but the Land Registry Equality Scheme includes the commitment, when carrying out its functions, to have due regard to the:

- elimination of direct or indirect discrimination, harassment and victimisation on grounds of age
- promotion of equality of opportunity between people of different ages.

The weight that Land Registry gives to age equality should be proportionate to its relevance to a particular function, as is the case for the statutory duties in relation to race, disability and gender.

There are only very limited circumstances when it is lawful to treat people differently because of their age.

- Where there is an objective justification for treating people differently.
- Where a person is older than, or within six months of, the employer's normal retirement age (or 65 if the employer does not have one) there is a specific exemption allowing employers to refuse to recruit that person.
- Where the discrimination is covered by one of the exceptions or exemptions given in the regulations, such as pay related to the National Minimum Wage.
- Where there is a Genuine Occupational Requirement that a person be of a certain age.

# Appendix C — Our Managing Diversity Strategy

## Land Registry's commitment to diversity

Land Registry is fully committed to treating people as individuals, providing equality of opportunity for all our employees and equal treatment for our customers.

We will operate all our policies towards our people, and will deliver our customer services, fairly, reasonably and without prejudice.

Valuing diversity will enable us to realise the full potential of all our employees and help provide the best possible service to our full range of customers.

We will:

- ensure that all employees are aware of Land Registry's policy on managing diversity and take appropriate action to improve knowledge and understanding. We will deal with any instances where our commitment to diversity has been undermined
- ensure that, as a minimum, our standards reflect the requirements of the law and any associated codes of practice and that we learn from best practice outside
- ensure that opportunities for recruitment, selection, job allocation, training and development and promotion are available to all and ensure that our performance management, appraisal and reward systems are fair, objective, and free from bias and stereotyping
- establish and promote an environment free from harassment, bullying, discrimination and victimisation and ensure that understanding of these issues is integral to the organisation's culture
- employ a workforce that reflects the diversity of local communities and society as a whole, which values and respects the individual and provides all customers with a service that is fair and meets their diverse needs
- set ourselves, and regularly monitor ourselves against, challenging diversity-based targets to maintain progress and to actively address areas of weakness.

