

***Pension Protection Fund
Equality Scheme***

2007 - 2010

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Introduction

The Pension Protection Fund was established to pay compensation to members of eligible defined benefit pension schemes, when there is a qualifying insolvency event in relation to the employer and where there are insufficient assets in the pension scheme to cover Pension Protection Fund levels of compensation.

The Pension Protection Fund is a statutory fund run by the Board of the Pension Protection Fund, a statutory corporation established under the provisions of the Pensions Act 2004. The Pension Protection Fund became operational on 6 April 2005. In September 2005, the Pension Protection Fund took on responsibility for the Fraud Compensation Fund - a fund that will provide compensation to occupational pension schemes that suffer a loss that can be attributable to dishonesty.

Our vision is:

'A society where all can enjoy the security of a fair pension in retirement.'

Equality & Diversity

Equality is one of the foundations of the Pension Protection Fund (PPF) and is taken into account in policy-making, service delivery, regulation and enforcement and employment practice. The PPF is committed to the promotion of equal opportunities and diversity to ensure that the human resources, talent and skills of all employees are maximised through the application of policies and procedures which are consistent and equitable and which recognise the expertise and ability of each individual.

Equality forms part of the PPF's general non-discrimination policy that ensures it does not unlawfully or unfairly discriminate against individuals on the grounds of their colour, race, nationality, ethnic or national origin, religion, beliefs, sexual orientation, sex, marital status, age, disability, gender re-assignment or political affiliation/opinion.

The Pension Protection Fund Equality Scheme

The Equality Duties

The Pension Protection Fund is covered by three 'public' duties to promote equality: the Race Equality Duty; the Gender Equality Duty and the Disability Equality Duty. Broadly, these duties require public authorities to carry out their functions with due regard to the need to:

- Promote equality of opportunity and eliminate discrimination and harassment
- Promote good race relations and positive attitudes towards disabled people

This Equality Scheme sets out our broad objectives for meeting the Equality Duties. The Action Plan sets out our initial plans for translating these objectives into actions and outcomes, and is intended to be a live document which may be amended following continued engagement and involvement of disabled people and those representing their interests.

Our main aims for equality and diversity

- Our recruitment and selection, management, reward and training policies prevent discrimination and provide equality of opportunity for staff and applicants from all backgrounds
- Both women and men, staff from all ethnic groups and disabled people are represented at all levels of the workforce and in all areas of work
- Our HR policies are responsive to specific needs among staff, where relevant, including flexibility for those with caring responsibilities, religious observance, facilities for disabled staff and applicants
- Our HR policies and management practice promote a culture that respects dignity at work and ensures that harassment of staff or other unacceptable behaviours are dealt with effectively
- Information, advice and other services to pension scheme trustees, specialists and members are accessible to disabled people and appropriate to the needs of diverse users
- There are no significant differences in satisfaction between different groups of staff and stakeholders
- Staff are aware of the implications of the equality duties and equalities legislation for their work and have the skills to meet them
- Equality issues are considered in procurement and policy-making.

Broad Objectives

The Scheme is based on the following broad objectives:

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| Objective One: | Make the Equality Scheme part of our working culture. |
| Objective Two: | Identify relevant functions and policies. |
| Objective Three: | Consultation and involvement as the basis for identifying priorities. |
| Objective Four: | Collect information to understand the effects of our policies and practices, and monitor them for possible adverse impact. |
| Objective Five: | Meet the specific duties in our role as employer. |
| Objective Six: | Make sure that information about the PPF and its services is available and accessible to the public. |
| Objective Seven: | Ensure that staff are aware of the implications of the equality duties for their work. |
| Objective Eight: | Evaluate progress. |
| Objective Nine: | Publish the Scheme and the results of assessments, consultations and monitoring. |

Objective One: Make the Equality Scheme part of our working culture

The PPF aims to make equality part of the working culture of the organisation. The PPF is required to produce a Race Equality Scheme, Disability Equality Scheme and Gender Equality Scheme, all at different timescales. The PPF has decided to produce a single Equality Scheme setting out our broad plans for meeting the duties and focusing on race equality in the first year. More detailed plans for disability equality and gender equality will be further developed within the scheme in years two and three.

The PPF has created an Equality section on its Internet site to keep staff and its stakeholders informed of developments. Postings to the site will include reports on current projects and updates on the Action plan (see Appendix Two).

The strategic objectives of the PPF for 2006/2007 and 2008/2009 have been used to ensure the Equality Scheme is integrated into the PPF and becomes a key driver of the objectives. The Action plan in Appendix Two demonstrates how the actions relate to the strategic objectives.

Senior Management Responsibility

Overall responsibility for the Equality Scheme rests with the Chief Executive who works closely with Senior Management and the HR Team in its implementation. Appendix Two contains an action plan for the implementation of the Equality Scheme. The work described in the Action Plan will be built into team and individual objectives for 2007/2008 and subsequent years.

Collective Responsibility

All employees have a role to play in the successful implementation of the Equality Scheme. Awareness of this scheme has been raised by communications with staff via forums, such as intranet stories, and filtered down from the Management Committee.

The PPF has set up a discussion group, representative of all areas of the organisation. The discussion group have been involved in preparing the Equality Scheme and suggested action areas.

The PPF ensures that its Corporate Induction introduces new staff to the organisation's equality and diversity policy and equal opportunities and diversity essentials online training, which also covers the concepts of harassment and bullying is available for all workers.

Objective Two: Identify relevant functions & policies

The Equality Duties require PPF to carry out its relevant functions and policies with due regard to the prevention of discrimination and harassment, the promotion of equal opportunity, good race relations and positive attitudes towards disabled people. The Duties apply to those functions that affect clients, customers and other members of the public as well as those that affect staff.

Two linked elements are taken into account in defining 'due regard': proportionality and relevance. The greater the relevance of a function to race, gender or disability equality, the greater regard needs to be paid to it in deciding which functions and policies need to be addressed under the Duties.

The PPF Strategic Plan 2006/7 – 2008/9 has identified six strategic objectives, each of which contain a set of specific activities and policies. The six objectives are:

- Maintain the solvency of the PPF within agreed limits;
- Play our part in building pensions confidence;
- Pay the right people the right compensation at the right time;
- Ensure effective two way communications with stakeholders;
- Investment in human capital to deliver the Board's functions;
- Achieve high levels of stakeholder satisfaction in respect of the organisation's professionalism, policies, processes and helpfulness.

In identifying our relevant functions and policies we identified three broad areas of activity, linked to these objectives, for inclusion in the Equality Scheme:

- External functions in relation to stakeholders, including communications with trustees and other pension scheme contacts;
- Staffing issues, including HR and management practice;
- Outsourcing and procurement strategies, in relation to those functions that provide services to the public or staff

The discussion group was used to identify and assess these functions and their relevance to the specific race, gender and disability equality duties.

In relation to customers and stakeholders and procurement issues the following questions were considered:

- What are the most important ways in which PPF interacts with the public – including trustees, pension scheme members, specialists and contractors?
- What practical actions can be taken to ensure that PPF operates fairly in its external activities, including responding to different needs?

For staffing and internal issues the following questions were considered:

- What are the most important HR policies and management practices that affect staff, including potential staff?
- What practical actions would you like to see taken, maintained or further developed as part of an Equality Scheme for the PPF?

Appendix Two outlines a programme of actions in relation to the main functions or areas of activity that have been identified as relevant.

The PPF will ensure that its relevant functions and policies are reviewed at least once over the three-year lifetime of the scheme.

Disability Equality Duty

An equality and diversity discussion group focusing on Disability was held in order to further develop the scheme with regard to the Disability Equality Duty. The following questions were considered:

- How can the PPF ensure that the way in which it describes and makes known its jobs and selects applicants is accessible to disabled people and that appropriate adjustments have been made?
- How can the PPF promote equality of opportunity and promote positive attitudes towards disabled people?
- How can the PPF review disability and language access to web based and other channels of information?
- How can the PPF review physical accessibility and the impact of recruitment, selection and other HR and management policies on disabled staff and applicants?

Appendix Two outlines a programme of actions in relation to these questions.

Whilst we will review the 2007 – 2010 Equality Scheme at the end of the three year period, specific reviews, particularly with regard to the disability equality duty will be undertaken prior to this date.

Objective Three: Consultation & involvement as the basis for identifying priorities

In preparing this Scheme we communicated with all staff in the organisation to invite their views of relevant functions and policies, as well as priorities for the Scheme, through the use of intranet stories.

We have and will continue to consult with staff as the Equality Scheme develops, and will seek to obtain feedback from all groups as we develop our gender equality and disability equality plans in more detail.

We will use our contacts with stakeholders to identify appropriate ways of obtaining feedback on how well our services, including advice and information for trustees and scheme members, are meeting their diverse needs.

We have and will continue to involve our Equality and Diversity Group as a driving force in the development and implementation of the Equality Scheme. Their input has been essential as a means of ensuring that disabled people are involved in the preparation of our plans under the disability equality duty. The Equality and Diversity group is made up of a cross section of employees with representation from all functions of the PPF. As less than 2% of staff at the PPF state they are disabled, the PPF has assumed that disabled peoples interests are represented in the Equality and Diversity Discussion group. The communications with all staff via the Intranet stories asking for their views also ensures representation of disabled people's interests. These measures are proportionate to the size and functions of the PPF.

Objective Four: Collect information to understand the effects of our policies & monitor them for possible adverse impact

The PPF is committed to assessing the impact of proposed and new policies with regard to the Equality Duties. Where new functions are added, an initial assessment will be conducted to take into account the potential impact on equality.

Guidance will be provided for policy makers on how to assess the likely impact of proposed policies, based on the recommendations contained in the Codes of Practice accompanying the three Duties (See Action Plan).

Monitoring Employment

We will monitor the following areas in order to assess whether our policies and practices are fair, or whether there is adverse impact:

- Staff in post profiles;
- Applications for employment;
- Applications for promotion;
- Applications for training.

Our monitoring is designed to identify profiles of staff and applicants by ethnic origin, gender and disability. We will use our staff satisfaction surveys to identify any adverse impact that might be experienced for other reasons, including sexual orientation and religion or belief. We recognise that good quality data is important if we are to assess the impact of our policies effectively. If there is evidence of low reporting levels by certain ethnic groups, genders or people with a disability we will investigate causes and take action to improve these, including ensuring that the reasons for such monitoring, and the use we will make of the data, are well understood .

We will:

- Collect accurate, consistent and up to date information on applications for employment, promotion and training;
- Submit six monthly monitoring reports to the Management Committee commencing in March 2008;
- Decide what action is needed to deal with any issues revealed by the monitoring data;
- Change policies, as appropriate; and
- Publish the results of our monitoring on the Internet

As the PPF has less than 150 full time staff, the additional employment monitoring duties of the Race Relations Act do not apply. However, we will review the impact of our main HR policies and practices, including staff appraisal, grievance, discipline and other management practices, on our staff in order to ensure that they are fair and consistently applied. (See Action Plans for more detail).

Monitoring our Service Provision

As outlined in the Action Plan, we will seek information on the impact of our communications and advice strategies in relation to stakeholders, including trustees. We will also ensure that communications with, and services for, pension scheme members are appropriate to meet their needs, including measures to provide accessibility for disabled people and those with language or other communication needs.

Our aim will be to ensure that we achieve high levels of stakeholder satisfaction in respect of the organisation's professionalism for all groups of stakeholder. We will continuously monitor and evaluate this by seeking the view of our staff and stakeholders about the effects of our policies and practices.

Monitoring Progress

It is the responsibility of the directors of the PPF to ensure that policies in their directorates are regularly reviewed for any evidence of adverse impact and for ensuring that these targets are included in their business plans.

If a Director finds that a policy has adversely affected equality they will bring it to the attention of the Chief Executive and HR Team.

The monitoring results will be published every year on the PPF Intranet and Internet and reported to the Management Committee. The results will be published in March 2009 for the first time.

Objective Five: PPF's Role as Employer

The following actions have been taken in support of the equality and diversity policy:

1) Systems have been set up to monitor:

- applicants for employment, training and promotion, and staff receiving training, by ethnicity, gender and disability;
- staff in post by ethnicity, gender and disability.

2) Equality and diversity results of previous staff surveys have been analysed.

The staff profile at 30th April 2007 can be found in Appendix Three. In summary, white staff make up 79% of those stating their origins and minority ethnic staff make up 21%. In total, 14.5% of staff did not state their ethnic origin, 6% of staff are black, 8.5% are Asian, 2% are Chinese and 2% are of mixed ethnic origin.

To ensure that we meet the specific race equality duty for employers, and the corresponding requirements of the gender and disability duties, we will investigate any patterns of inequality revealed by our monitoring, and take remedial action to address any disparity or anomaly.

PPF has a full range of policies designed to ensure that our approaches to recruitment, selection, reward and management of staff are fair and consistently applied. There are policies on Flexible Working, Anti-harassment, Equality and Diversity, Performance and Development Review, Salary and Whistleblowing. Procedures on Recruitment and Selection are available on the Intranet.

Our plans for reviewing the impact of these policies, and for regularly monitoring staff and applicant profiles and other aspects of employment are outlined under Objective Four above, and in the Action Plan.

Disability & Gender

In order to meet the specific requirements of the Gender and Disability Duties we will also carry out a review of the impact of our policies on pay, in order to identify any pay gap and its causes. As part of our work towards the Disability Equality Duty the Equality and Diversity Discussion Group have reviewed the ways in which we describe and make known our jobs and select applicants, in order to ensure that they are accessible to disabled people and that appropriate adjustments have been made. The programme of actions in relation to this review can be found in Appendix Two.

The Pension Protection Fund is committed to the employment and career development of disabled people. To demonstrate our commitment we use the Disability Two Ticks Symbol. As a symbol user, we guarantee an interview to anyone with a disability (as defined by the Disability Discrimination Act 1995) whose application meets the minimum criteria for the post.

These commitments are:

- to interview all disabled applicants who meet the minimum criteria for a job vacancy and to consider them on their abilities

- to ensure there is a mechanism in place to discuss, at any time but at least once a year, with disabled employees, what both parties can do to make sure disabled employees can develop and use their abilities
- to make every effort when employees become disabled to ensure they stay in employment
- to take action to ensure that all employees develop the appropriate level of disability awareness needed to make sure these commitments work
- to review these commitments each year and assess what has been achieved, plan ways to improve on them and let employees and Jobcentre Plus know about progress and future plans

Objective Six: Make sure that information about the PPF & its services is available & accessible to the public

Access to Information

The PPF services and any information that we publish to the public can be found on our comprehensive website. As outlined in the Action Plan, we will review the website in order to ensure that it is fully accessible, including addressing any needs for alternative formats, languages or other presentation methods. Some website data is also available in the Welsh language.

Access to Services

The PPF provides access to its services by the following media:

- Website
- E-mail
- Letter
- Face-to-face meetings
- Conferences and other events
- General and specific advice from our Stakeholder Support Team
- By telephone
- Written guidance including publications and fact sheets

We have outlined in the Action Plan ways of obtaining feedback from our stakeholders on the extent to which our information and advice, including our outsourced services, are accessible and appropriate to all groups. The PPF will regularly review the extent to which its information and other services are accessible to all by methods such as reviewing the website and other channels and obtaining feedback through sessions with stakeholders. Further details are available in our Action Plan.

Objective Seven: Ensure that staff are aware of the implications of the equality duties for their work

We have undertaken a training needs analysis to find out the need for learning and development activity in the PPF. We have used the findings to develop a learning and development programme to meet the needs of staff. Equality and diversity will form a central component of this, by making sure that all our workers are fully aware of, and trained on the requirements of the general, specific and employment duties of the race, gender and disability equality schemes.

We will regularly conduct a training needs analysis to ensure that the programmes we offer remain relevant to these duties.

The Action Plan in Appendix Two sets out the main objectives and timetable for implementing and evaluating this training.

The PPF continues to develop and offer training on the implications of the equality duties in the following ways:

- Guidance for staff, to make sure they are aware of the equality duties and how these affect them and their work. This forms part of the Corporate Induction for new starters and the basis of our online e available for workers to take.
- Guidance for those who will make decisions about policy or implement the PPF's HR procedures.
- Employment Law training for managers or those involved in operating the PPF's HR procedures which incorporates discrimination and equality guidance.

We will continue to monitor and review applications for, and attendance at, these courses as part of the duties in Objective Four.

We are also implementing a comprehensive programme of training for managers, to make sure they have the skills needed to deal with a wide range of employment and service delivery issues, ranging from leadership skills to focusing on strategic priorities. We aim to ensure that PPF staff have the skills and knowledge to help eliminate unlawful discrimination, and promote equal opportunities and good relations for all, both internally and in the services we provide.

Objective Eight: Evaluating progress & developing the Equality Scheme

The Equality Scheme was reviewed in December 2007 in order to introduce a more detailed set of actions in relation to the disability equality duty. This review was done in conjunction with the equality and diversity discussion group in order to ensure the interests of disabled people were represented.

Disability Equality

The Action Plan outlined in Appendix Two includes actions that have been identified with regard to the disability equality duty.

The PPF is providing online equal opportunities and diversity training for its workers (regardless of employment status) to ensure that the PPF and all its employees are focused on eliminating discrimination and harassment towards disabled people.

The PPF is also introducing Mental Health Awareness Sessions for all its employees. This initiative has been led by the Chief Executive in conjunction with Mind in Croydon and has been introduced from the top down by way of an awareness session for Senior Management before being rolled out to all staff.

The PPF is keen to work towards the 'Mindful Employer' accreditation which is aimed at increasing awareness of mental health at work and providing support for businesses in recruiting and retaining staff. This will form part of the PPF's work to promote equality of opportunity and positive attitudes towards disabled persons whilst ensuring that disabled peoples interests are represented.

Gender Reassignment

As part of the Gender Equality Duty the PPF is required to have due regard to the need to eliminate unlawful discrimination and harassment in employment and vocational training, for people who intend to undergo, are undergoing or have undergone gender reassignment.

When the PPF's policies and procedures are reviewed Human Resources will take due regard to these issues to ensure the duty is met. Gender reassignment and the need to eliminate unlawful discrimination and harassment in this area is highlighted and explored by the online equality and diversity training the PPF is rolling out to its workers.

Objective Nine: Publish our plans & the results of assessments, consultations & monitoring

We will publish our Equality Scheme on our website, including a summary of the results of assessments and consultation undertaken. We will also publish any further developments to the Equality Scheme and a summary of the results of monitoring undertaken.

Meeting the Duty in relation to outsourced Services

As a public authority, the PPF must take equality into account when procuring goods, works or services from external providers.

In any procurement that is relevant to the duty, to promote equality in the following areas:

- services provided under contract or agreement;
- contractors' equal opportunities policies and practices; and
- contract opportunities for businesses owned or run by people from minorities.

The PPF should ensure that the contracting firm should provide the service without discrimination. If appropriate, the PPF will include a clause in the contract to allow the PPF to monitor and enforce this duty. Please see the action plan in Appendix Two for further information on this.

Appendix One: Assessment of functions & policies

PPF's main strategic objectives, under which relevant functions and policies can be identified are:

- Play our part in building pensions confidence
- Pay the right people the right compensation at the right time
- Ensure effective two way communications with stakeholders
- Investment in human capital to deliver the Board's functions
- Achieve high levels of stakeholder satisfaction in respect of the organisation's professionalism, policies, processes and helpfulness

The following chart outlines specific categories of policy and activity that have been assessed as relevant, and which link with these overall objectives.

Appendix 2 sets out the actions that will be taken as part of our implementation of the Equality Duties.

Functions/Policies	Diversity Impact	Reason for Rating	Review By
External functions in relation to building confidence; effective two way communications and achieving high levels of stakeholder satisfaction	Aspects of these functions have a potentially high impact (Race, Disability and Gender) Priorities will be identified as a result of the reviews outlined in the Action Plan	Key relevant activities and functions were identified as: 1) Communication with and advice to the public, trustees and stakeholders, including: <ul style="list-style-type: none"> - Internet (currently in English and partly in Welsh) and other electronic communications - Area based workshops for trustees - Development of case studies and other advisory materials - E mail and telephone queries via the Stakeholder Support Team. A minicom system is currently available for deaf callers - Public speaking events and PR, including Board Directors' speeches; press releases; CEO articles - TV announcements - Parliamentary reviews 2) Research <ul style="list-style-type: none"> - Including an annual stakeholder survey carried out by MORI 3) Direct contacts with pension schemes, and in particular trustees 4) Specific services for pension scheme members (see Outsourced services)	2 March 2010

Staffing issues, including HR and management practice	High in all areas (Race, Disability and Gender)	<p>Key policies and practices include those relating to:</p> <ul style="list-style-type: none"> • Recruitment and selection • Performance appraisal/management • Learning and development • Flexible working policies • Harassment/dignity at work • Pay/reward policies • Staff benefits and facilities • Physical access and support systems • Collection of diversity data on staff and applicants 	2 March 2010
Outsourcing and procurement strategies	High in all areas (Race, Disability and Gender) where PPF functions are outsourced	<p>Key policies and practices relating to:</p> <ul style="list-style-type: none"> - Externally outsourced services providing information/facilities for the public, particularly payments and advice to pension scheme members - Outsourced services affecting PPF staff, particularly involving elements of recruitment 	2 March 2010

The PPF will ensure that it reviews no later than 2 March 2010 and at 3 yearly intervals thereafter, the list of functions and proposed policies which have been assessed as relevant to its equality duty.

Appendix Two: Action Plan

Function	Action	Timescale	Link To Strategic Objective
External functions in relation to stakeholders: Communications & Research	Ensure that PPF's information & communication approaches reach all groups within the community through: <ul style="list-style-type: none"> • Reviewing disability & language access to web based & other channels of information • Building relevant messages into public speaking events, press releases & further communication methods • Identifying relevant information in complaints from stakeholders 	Year One	'Play our part in building confidence in pensions' 'Achieve high levels of stakeholder satisfaction in respect of the organisation's professionalism, policies, processes & helpfulness'
External functions in relation to stakeholders: Trustee support:	Ensure that any relevant information & support needs are identified by: <ul style="list-style-type: none"> • Using road shows & direct contacts with trustees to obtain feedback on possible information, advice & support among particular groups • Direct contacts with trustees • Identifying ways of obtaining feedback from stakeholder perception audits 	Years One & Two	'Ensure two way communication with stakeholders is effective'
Staffing issues: HR	Build on the current diversity monitoring system to obtain improved data on job applicants and staff in post Review recruitment, selection, performance development & management policies, including: <ul style="list-style-type: none"> • Diversity monitoring of recruitment & selection data, including selection carried out by external agencies • Results of performance development policies • Policies on promoting dignity at work, including access to advice & support channels in cases of harassment • An equal pay review to identify any gender pay gaps & the reason for these • A review of physical accessibility & the impact of recruitment, selection & other HR & management policies on disabled staff & applicants • Making clear PPF's expectations of agencies dealing with outsourced recruitment 	Year One	'Investment in human capital to deliver the boards functions'
Staffing issues: Learning & Development	Build awareness of the implications of equality duties & legislation into staff learning & development strategies, including: <ul style="list-style-type: none"> • Develop a process, including guidance, for carrying out a review of policies & functions • Introduce online equality and diversity training for all staff to raise awareness of the equality duties and to promote positive attitudes towards disabled people 	Year Two	'Investment in human capital to deliver the Boards functions'
Outsourcing & Procurement	Review outsourcing & procurement processes with a view to ensuring that: <ul style="list-style-type: none"> • Appropriate requirements are included in relevant contracts with external providers of PPF functions, including those concerned with staff recruitment 	Year One	'Play our part in building pensions confidence'

	<p>& payments or advice to pension scheme members, to ensure that services are fair to all groups & responsive to different needs</p> <ul style="list-style-type: none">• Relevant measures are discussed with external providers• Guidance is provided for staff on the equality & diversity issues to be considered when developing procurement approaches• Channels for inviting inward secondments do not unlawfully restrict opportunities		<p>'Investment in human capital to deliver the Boards functions'</p>
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Appendix Three: PPF staff profile as at 30th April 2007

Ethnicity

White staff make up 79% of all those stating their origins and minority ethnic staff make up 21%

Further statistics are:

<i>Ethnicity</i>	<i>Percentage of staff</i>
White	67%
Black	6%
Asian	8.5%
Chinese	2%
Not Stated	14.5%
Mixed	2%
Total	100%

Gender

Male	60%
Female	40%

Proportion of staff with a disability

Less than 2% of staff state that they are disabled

21% of staff do not state whether they are disabled or not

More detailed profiles of staff in post by job level and category will be carried out as part of the Equality Scheme.