

CNPA DISABILITY EQUALITY SCHEME 3 YEAR REVIEW AND ACTION PLAN December 2009

Background

1. The CNPA published its first Disability Equality Scheme (DES) in Dec 2006 setting out how it will promote equality of opportunity for people with disabilities in the delivery of its public functions and as an employer. The CNPA must review its DES after 3 years and publish a new DES on 4 Dec 2009.
2. This paper reports on progress made on CNPA's existing DES, what has been achieved, the barriers and any gaps, thus informing the development of our new DES. The report uses as a framework the specific duties i.e. the legal requirements, for the CNPA in meeting the Disability Equality Duty. These are:

Gathering and Using Evidence

3. **EHRC says: 'Show that your priorities are based on the evidence that you gather and use'**
4. **What we said:**
 - a) Development of Inclusive Cairngorms (IC) so that they are more effectively used by CNPA staff, as well as benefits to member organisations.
 - b) Future staff survey will be revised to provide more information on equalities issues.
 - c) Equality monitoring at all stages of employment is on-going, and information gathered is used to identify barriers and improve processes.

What we have done to gather and use evidence

Inclusive Cairngorms (IC)

5. A Development Workshop was held with IC in January 09 to identify ways to make the group more effective, both for CNPA staff seeking IC's advice, and member organisations. This workshop identified key policy areas of interest to IC, related to the CNPA Corporate Plan, which would help CNPA staff know when to engage IC. These key areas, i.e. priorities, include **outdoor access, visitor services and information, communities, housing and planning and Equality Schemes**. This exercise has also helped inform CNPA on prioritising areas within the Operational Plan for Equality Impact Assessment.

In addition, the workshop identified ways to interact with CNPA and their role in supporting the CNPA regarding inclusion and equality issues.

Joint National Parks Outreach project

6. In 2007, the CNPA jointly commissioned some research with Loch Lomond and the Trossachs NPA and Scottish Natural Heritage to identify the barriers that prevent people from socially excluded backgrounds from engaging with the National Parks and National Nature Reserves. This included people with disabilities. Findings from

literature review identified the most common barriers for people with disabilities visiting the countryside:

- a) Physical barriers, such as steps, steep gradients, stiles and gates
 - b) Lack of accessible information
 - c) Lack of accessible toilets
 - d) Lack of confidence, low expectations, not feeling welcome, fear over safety or of getting lost
 - e) Too far to walk
 - f) Lack of convenient and accessible public transport
 - g) Inaccessible café, shop or visitor centre
 - h) Lack of seating and opportunities to rest or take shelter
 - i) Cost of transport, parking fees and refreshments
 - j) Lack of staff awareness of the needs of disabled visitors
 - k) A limited range of activities
 - l) Poorly maintained environment
- (By all reasonable means: Inclusive access to the outdoors for disabled people, Sensory Trust, Oct 2005).

7. The research report also identified ways to address the barriers to engagement and the recommendations are broadly categorised under 4 main headings:
 - a) Building relationships and developing networks
 - b) Raising Awareness and understanding
 - c) Building commitment, confidence and competence
 - d) Practical support.
8. The specific actions as they relate to people with disabilities are referred to in the DES Action Plan.

National Park Visitor Survey

9. The CNPA has commissioned a second visitor survey (May 09 – Apr 10), which will, in due course, provide useful information on people with disabilities visiting the National Park.

National data

10. In Scotland as a whole, the 2001 census showed that one in five people (20.31%) have a disability or limiting long term illness.

Aberdeenshire

11. In Aberdeenshire the proportion of the population with a limiting long term illness or disability is 15.31%. Of the working age population 11.16% people have a limiting long term illness. 0.38% of the Aberdeenshire population are registered blind or partially sighted; 0.66% of the population are adults with a learning disability known to the council; and 0.5% of the population accessed mental health services within the Aberdeenshire local authority.

Highland

12. In Highland the proportion of the population with a limiting long term illness or disability is 18%. According to a 2005 survey, 55% of working aged disabled people are in employment (compared with 46% nationally in Scotland).
13. According to Highland Council figures 1.47% of the population is either registered blind, partially sighted or visually impaired; 0.36% of adults are known to have a learning disability and it is estimated by Highland council that around 40,000 – 50,000 (18% of the population) are likely to experience mental health issues at some point.

Moray

14. In Moray the proportion of the population with a limiting long term illness or disability is 16.69%. No further detail about disability in the area was available.

Angus

15. In Angus the proportion of the population with a limiting long term illness or disability is 18.56%. No further detail about disability in the area was available.

Internal

CNPA Staff

16. Other than at the point of applying for a job, we do not capture information about staff's disabilities. There are no records on this. We aim to rectify this by incorporating a question on the bi-annual appraisal sheet, as well as through the annual "staff details" information gathering.
17. The Staff survey has been delayed until autumn 2009, to take advantage of Sunday Times 'Best Workplaces' award. This is an externally conducted survey, which will only touch on equalities issues, and therefore an in-house survey will be conducted in summer 2010, to more fully survey staff on the main equalities strands. However staff are able to raise equalities issues (including disability) through the Staff Consultative Forum where equalities is a standing item on meeting agendas. These meetings are held every quarter.
18. In terms of equality monitoring of employment, recruitment to training, leavers etc, all job applicants complete a questionnaire which captures their equalities needs. However, with regards current staff, we have not to date captured equalities needs. AS such, we are currently gathering baseline information through the appraisal system, beginning in October 2009. Staff will be given the opportunity to raise their equalities needs at the 6 monthly appraisal, and once this information is captured, systems will be implemented to record, monitor and address their needs.

CNPA Board members

19. The CNPA has a Board member with a visual impairment who is very active in ensuring that disability equality is at the forefront of decision making at both strategic and operational levels within the organisation.
20. To date we have had no means to capture information about the equalities needs of board members. A "board members details" questionnaire will be sent to all board members early in 2010. This will include a question about any equalities needs. This

information is relevant to help us ensure we are meeting the needs of our board members with regards meetings, accommodation and general communication.

Accommodation

21. Capability Scotland did an accessibility audit on the Grantown office in 2007 and recommendations were implemented to make the building more accessible for staff and visitors to the office who may have a disability. Key areas that were reviewed were the approach and car park; rear and front entrances; reception area; communications; internal stairs; board room; public toilets; and fire exits. Most recommendations were implemented, including the following:
 - a) New disabled parking signage has been erected
 - b) Redesigned reception area that now includes an induction loop and a new and lower reception desk
 - c) All staff are now writing all communications in font size of 12, with the Gill Sans style
 - d) A new high tech portable hearing loop is available for use in the reception and board room
22. IC provided further advice on the design of the new reception area, and also carried out an audit of the Ballater office with recommendations implemented thereafter, which mainly focused on accessing the office and directional signage. Accessibility of both buildings will be monitored and addressed on an on-going basis through feedback from visitors and staff.

Consultation and Involvement

23. **EHRC says ‘Show that your priorities are based on what disabled people see as the most important areas to tackle’**
24. **What we said:**
 - a) Involve Inclusive Cairngorms (IC) in the development of CNPA policies to help create a Park for All.
 - b) Formation of sub-groups of IC to work on different strands of equality, prioritise and impact assess CNPA policies for equality.
 - c) Involve other advisory groups to CNPA on disability equality e.g. Local Outdoor Access Forum (LOAF).

What we have done to consult and involve

Inclusive Cairngorms

25. As mentioned previously, a workshop was held in January 2009 to consult IC on their key areas of interest as they relate to CNPA’s Corporate Plan. This has helped CNPA staff to engage more effectively with IC in planning and developing their work activity. (The priority areas identified were outdoor access, visitor services and information, communities, housing and planning and CNPA’s Equality Schemes.)
26. IC meetings are held quarterly and provide a further means of consulting people with disabilities and gathering information on the impacts of CNPA policies/projects. Eg. At their April 2009 meeting, IC advised on ways to improve our engagement with

people from different equalities groups including people with disabilities. This information has been fed back to the Community Development officers to help them engage with the more marginalised residents within the communities taking part in the Community Needs Initiative. IC have also advised on other areas of CNPA work including the National Standards for Community Engagement, Core Paths Planning, Cairngorms Explorer visitor guide and the development of guidance for path signage and community path leaflets. This has provided valuable advice in ensuring our consultation exercises are as inclusive as possible (within financial constraints) and the publications and the information we produce is clearly presented and following best practice standards.

27. Management Team and key staff are given advance notice of meetings so that they can use these meetings to consult on relevant areas of work and equality impacts. Sub-groups of IC have been formed as and when required, egg to comment on planning applications, HR policies, etc.
28. Overall IC are regarded as a highly valuable resource for CNPA providing advice, expertise and information on equality and inclusion work in the Park. Their input will continue to be sought in implementing Equality Impact Assessments in the CNPA.

Joint National Parks Outreach Project

29. A key project – the Joint National Parks Outreach project – involved a group from Capability Scotland in a pilot visit to the National Park to ‘test’ how accessible it was. Other disability groups and organisations were also involved in this research to develop an outreach framework for engaging with groups visiting the National Park.
Egg insert names
The outcomes of this project (also referred to in previous section) are incorporated into the Action Plan.

Equality Schemes

30. CNPA has involved people with disabilities in the development of our Equality Schemes including this DES review. A sub group of IC met and provided comment and suggestions on our new DES, which involved CNPA staff and external partners including Highlands and Islands Equality Forum, Capability Scotland, Badenoch and Strathspey Transport Company, Highland Disabled Ramblers and Deaf Awareness in Highland and Aberdeenshire Council. The wider Inclusive Cairngorms network has also had the opportunity to input into the DES at all stages of its development.

Local Outdoor Access Forum (LOAF)

31. A place on the LOAF was originally set aside for a member representing people with disabilities. However there is currently no member with a specific interest in disability, although there is a general awareness and experience of working with people with disabilities. Feedback from our DES Review meeting in Aug 09 suggested it would be desirable to have a member specifically representing disabilities.

Other involvement

32. The CNPA engaged with disabled people at the Rural Equalities conference in *
insert date and through Rural Equalities network (Highlands and Islands Equality Forum)

Internal

33. Staff "Away Days" are held twice each year. These events are used to discuss key themes that are relevant to staff, the organisational culture, and stakeholder relationships. All staff are invited to contribute their views and are involved in how we develop our core approaches.
34. Equalities issues are a standing item on the Staff Consultative Forum agenda, and this ensures consistent awareness of equalities issues.
35. Appraisal forms have been amended to include a section about the equalities needs of staff. Line managers have done appraisal training, which includes how to deal with sensitive information about disability. This is helping us to get baseline information about the equalities needs of our staff, and actions will thereafter be implemented on the basis of this data to ensure that our staff are safe and comfortable in their working environment.

Impact Assessment

36. **EHRC says: 'Show that you are considering the impact of your decisions on disabled people'**
37. **What we said:**
 - a) CNPA will identify and prioritise policies and procedures that may cause barriers to disabled people and amend them to prevent potential discrimination.
 - b) Develop template for reviewing policies in consultation with disabled people and IC.
 - c) IC to help with impact assessments.
 - d) CNPA staff will attend EqIA training.

What we have done

Equality Impact Assessment (EqIA) training

38. Fourteen CNPA staff attended EqIA training in July and October 2008, alongside staff from Scottish Natural Heritage. At least one member of staff attended from each Group and these staff will provide support to other Group members in carrying out EqIA's. Of these staff, an Equality champion is being nominated for each Group.

Prioritising policies for EqIA

39. At their meeting in January 2009, IC helped to identify and prioritise policy areas in Corporate Plan that impact on equality groups. Following this, fourteen programme managers and other staff met to identify related areas of activity within the Operational Plan. Many of these can be grouped together under broad themes, and the intention is to impact assess these activities using a generic EqIA form as a template.
40. Generic EqIAs will be prepared for:

- a) Publications and print including leaflets, interpretation, visitor information and promotion
 - b) Websites including NP portal, corporate and Learning Zone
 - c) Community Engagement / working with people including holding events, meetings and venues
 - d) Training including Cairngorms Awareness and Pride, Land Based Business Training courses, and other public training
41. Individual EqlAs will be prepared for specific areas of Operational Plan:
- a) Corporate and HR policies egg recruitment, staff training and development, accommodation
 - b) Outdoor Access – Core Paths Planning implementation, Speyside Way extension, transport, health walks
 - c) Development Plan
 - d) National Park Plan

Implementing EqlA

42. Our timescale for rolling out EqlA has been delayed due to training availability and the additional time needed to confirm the process through senior management. However this does mean that there is greater buy-in from senior managers and the process is more rigorous. Following revisions to the EqlA form, staff guidance, and endorsement of the process by Management Team, EqlA will be rolled out in autumn 2009. Staff will be encouraged to consult with Inclusive Cairngorms to help assess the impact of their activities on people with disabilities (and other equality groups).
43. Meantime, two full EqlA's have been completed to date, for Core Paths Planning and Recruitment. In addition, several areas of work have been 'informally' impact assessed through consultation with IC egg guidance for path signage and path leaflets.

Embedding Equality within CNPA

44. We have also identified further ways to embed equality into policy and project development and procedures. These will be explored further including:
- a) Expenditure Justification Forms – additional question on equality impacts
 - b) Grants programme – social inclusion applications screened by Inclusive Cairngorms sub-group
 - c) Board Papers – additional reference to equality impacts
 - d) Grants to third parties – include equality considerations in grant terms and conditions.
 - e) Procurement of services – include equality considerations in tender documents.
 - f) Programme and project management guidance

Action Planning and Delivery

45. **EHRC says 'Include an action plan to deliver the outcomes that you have prioritised'**
46. **What we said:**
- a) Section on how disability equality is being addressed through the National Park Plan.

- b) Specific actions set out in an Action Plan.

What we have done

47. An Action Plan is included in our DES 2006-09 and annual updates were published in June 08 and June 09. (see Annual Updates for actions delivered). A summary of key actions and outcomes not already referred to in previous sections, is listed below.

Internal Delivery

Training

48. Staff and Board training in disability awareness was delivered in 2007/08 by Capability Scotland and attended by 50 staff and 3 Board members. Most staff have a good general awareness of disability issues, but the Board have not had the same opportunity to attend this training. So as part of our ongoing training programme, further equality training for all staff and Board members is scheduled for 2010.

Accessible Meetings

49. Public meetings are held in buildings which are accessible unless absolutely unavoidable. Hearing loop or other requirements are provided on request in advance of meetings. Video conference facilities are now in place in Granttown and Ballater offices. Guidance on holding accessible meetings was produced and promoted to staff to ensure external meetings are accessible as possible for people with disabilities. As there is little evidence of how much this is used and adhered to by staff, it is intended to 're-launch' it in autumn 09. This will include an easy-reference guide including a checklist, a directory of accessible venues, booking and evaluation pro-formas, all available in electronic format.

Recruitment and employment

50. Jobs are advertised in the local press and on the website, and are accessible to all. Adverts have also been placed in specialist disability magazines promoting CNPA as an equal opportunities employer. CNPA is recognised as a 'Two Ticks' employer, obtaining the Positive about Disability symbol. On-going manager training and HR induction for new staff ensures that CNPA recruitment and employment policies are not discriminatory.

Communications

51. CNPA have adopted a new 'accessible' corporate typeface 'Gill Sans', approved by the Scottish Accessible Information Forum. All corporate leaflets are available in large print and audio tape on request. In the last 5 years, we have responded to four requests for large print. CNPA's revised corporate website conforms to Priority 3 accessibility guidelines and the National Park web portal will meet Priority 1. Plain English training for staff has not been undertaken to date, but this is scheduled for 2010.

CNPA offices

52. As well as the recommendations implemented following the access audits of both buildings CNPA has installed computer software for visually impaired staff and visitors to the office.

Influencing other organisations

53. CNPA has - and continues – to influence other organisations in relation to equality good practice. This has been mainly through Inclusive Cairngorms, which features case studies and presentations on successful inclusion projects at its meetings. We are looking at ways to develop this sharing of best practice including using CNPA and member websites, and identifying other mechanisms to report back to members' organisations. In addition, we will explore the potential for collaborative working and sharing information on equalities projects with other SEARS organisations egg SNH and Loch Lomond and Trossachs NPA, and through the Scottish NDPB Equality Forum.

Delivery through the National Park Plan

Equality awareness training

54. In Spring 2009, equalities training was delivered to land managers, tourism and outdoor recreation providers to raise their awareness of the equality needs of visitors and thereby improve their service to this client group. This was funded through the Land Based Business Training and Cairngorms Awareness and Pride projects. Although widely promoted, this training attracted only three businesses. It is therefore planned to offer this training again in spring 2010.

Transport

55. CNPA has worked with transport providers to improve transport links and accessibility around the National Park, including funding the Heather Hopper bus service. One of the buses used was low floored to allow disabled access. By 2017 all buses will require to be DDA compliant, and 2020 for trains.
56. The Cairngorms Explorer transport guide is produced annually and provides accessibility information on public - and other forms - of transport. In 2009, further information was provided on all abilities trails in National Nature Reserves in the Park.
57. Research findings and anecdotal evidence suggests that transport is a key barrier for disabled people accessing the Park, therefore CNPA will continue to work with transport providers, including community transport, to improve services for disabled people.

Visitor Information

58. The design of CNPA leaflets and other interpretation conforms to DDA guidelines, best practice, and information is available in other formats on request. The use of images of people with disabilities will be guided by the results of the Visitor Survey, in terms of the balance of participation in different activities. CNPA is working with Cairngorms Outdoor Access Trust (COAT) to provide information on accessible paths across the National Park. COAT is currently developing a leaflet on accessible paths in Aberdeenshire, and it is planned to produce a similar leaflet for the west side of the Park.

Ranger Services

59. Since April 2009, the CNPA has taken on the role of providing funding to ranger services across the Park. As part of the Service Agreement, ranger services must produce an Equality and Diversity Statement, setting out how they will cater for and promote their service to people of all abilities.

Access

60. The CNPA is working with partners to develop a range of outdoor access and recreational opportunities in the National Park. This includes the development of Core Paths which will be as inclusive and barrier-free as possible. The Core Paths Plan has been consulted on widely (including with people with disabilities) and will be implemented from 2010.
61. In addition, CNPA has helped to develop health walks across the Park, encouraging those less active and recovering from ill health to use the National Park to improve

their physical and mental health and wellbeing. CNPA is continuing to support this work through COAT.

Housing

62. CNPA continues to work closely with Registered Social Landlords, landowners and other public bodies to secure housing which is both affordable and accessible for those who wish to live and work in the National Park. The CNPA planning team have consulted with Local Access Panels and more recently with Inclusive Cairngorms on certain planning applications.

Publishing, Reporting and Reviewing

63. **EHRC says 'Develop your actions so you can report on them in future annual reports'**
64. **What we have done**
- a) CNPA published its first DES in December 2006 on CNPA website www.cairngorms.co.uk
 - b) CNPA provided annual updates on our DES and Action Plan in June 08 and June 09 as part of a Joint Equality Scheme covering disability, gender and race.
 - c) CNPA have established an Internal Equalities Group which meets quarterly to oversee the development of our equalities work including our Equality Schemes and Equality Impact Assessment.

Refocusing priorities for disability equality in CNPA

65. Reviewing our DES provides an opportunity to refocus our priorities to ensure we are tackling the most relevant and significant issues to bring about disability equality. In doing this, we must consider what we have achieved to date and focus where more work is required, while also considering any evidence and the views of disabled people.
66. Importantly, the new DES should also reflect CNPA's business, i.e. the Corporate Plan and Operational Plan, in particular the key policy areas identified by Inclusive Cairngorms:
- a) **Outdoor Access**, including core paths, health walks and transport
 - b) **Visitor services** including publications, interpretation, information, rangers
 - c) **Communities** including community engagement (events, meetings, training, venues)
 - d) **Housing and Planning** including Local Plan
 - e) **Equality Schemes**, including corporate and HR policies – recruitment, staff development and training, accommodation
67. The following Action Plan includes feedback from a meeting on 24 August 2009 involving CNPA staff and Inclusive Cairngorms partners representing Deaf Awareness, B&S Transport Company, Highland Disabled Ramblers, Capability Scotland and Highlands and Islands Equality Forum. The wider Inclusive Cairngorms network has also had the opportunity to provide input at their meeting on 26 September 09 and by correspondence.
68. It also includes some actions carried forward from DES (2006-09).