

Food Standards Scotland

Equality Mainstreaming Report April 2016

Foreword

Welcome to our first mainstreaming equality report under the specific duties of the Equality Act. This document sets out our current position, and our commitment to fully embed equality as a key component of our business, both as a consumer protection body and also as an employer.

Our role is to protect the Scottish public from health risks arising from the consumption of food and to provide advice on promoting good health through the food we eat and it is important that we seek to ensure that our services are accessible by, and benefit, everyone. This is equally important whether you are a food business operator or a consumer. We will be reviewing a number of our key services over the next two years, to ensure they are consistent with our commitment to equality, and our commitment to being a world-leading consumer protection agency.

We also want to be an excellent employer. We cannot deliver our vision without skilled and committed people. Food Standards Scotland is committed to equality of opportunity for all, and we want everyone who works here to be treated fairly and consistently. We value diversity in our workforce; it brings a range of talents and different perspectives to our work, and rightly should reflect the diversity of our customers.

This report is a demonstration of our commitment to delivering equality of opportunity across the range of services we deliver and in our employment practices.



Geoff Ogle
Chief Executive

1. About Food Standards Scotland

Food Standards Scotland was established by the Food (Scotland) Act 2015 as a non-Ministerial Office, part of the Scottish Administration, alongside, but separate from, the Scottish Government. Our primary concern is consumer protection – making sure that food is safe to eat, ensuring consumers know what they are eating and improving nutrition. With that in mind, our vision is to deliver a food and drink environment in Scotland that benefits, protects and is trusted by consumers.

We contribute to the following Scottish Government national outcomes:

- We live longer, healthier lives
- We have tackled the significant inequalities in Scottish society
- Our children have the best start in life and are ready to succeed
- We realise our full economic potential with more and better employment opportunities for our people
- We live in a Scotland that is the most attractive place for doing business in Europe
- We reduce the local and global environmental impact of our consumption and production
- Our public services are high quality, continually improving, efficient and responsive to local people's needs.

Food Standards Scotland has a remit to help protect the public from risks to health which may arise through the consumption of food; and advise on how what we eat will promote good health. To deliver this, we have the following specific functions:

- to develop and help others develop policies on food and animal feed;
- to advise the Scottish Government, other authorities and the public on food and animal feed;
- to keep the Scottish public and users of animal feed advised to help them make informed decisions about food and feed stuffs;
- and to monitor the performance of food enforcement authorities.



2. Our Legal Duties for Equality

The Equality Act 2010 and the Equality Act (Specific Duties) (Scotland) Regulations 2012 set out a single equality duty and statutory specific duties for listed public bodies in Scotland. Listed organisations, including Food Standards Scotland, must meet these duties in order to ensure positive and real change for people with protected characteristics.

The General Equality Duty

The general equality duty requires us, in the normal course of our work, to take account of the need to:

- eliminate unlawful discrimination, harassment, victimisation and other prohibited conduct;
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not;
- foster good relations between people who share a protected characteristic and those who do not.

Specific Statutory Duties in Scotland

In Scotland, there are specific duties set out to enable us to evidence what we are doing in relation to equality. These require us to:

- report on mainstreaming the equality duty and publish against progress every two years;
- publish equality outcomes every four years and report progress towards achieving these every two years;
- assess and review policies and practices;
- gather and use employee information;
- publish gender pay gap information;
- publish statements on equal pay;
- consider award criteria and conditions in relation to public sector procurement;
- publish in a manner which is accessible.

Protected Characteristics

The protected characteristics listed in the Equality Act 2010 are:

- race;
- sex;
- age;
- disability;
- sexual orientation;
- religion and belief;
- gender re-assignment;
- marriage and civil partnership;
- pregnancy and maternity.

3. Scope of Report

This is the first mainstreaming equality report produced by Food Standards Scotland. As a new body, it will set out our plans for how we will embed equality across the organisation in order to meet both the general and specific duties outlined earlier. The report will set out a summary of our workforce data and monitoring information on employment activities as well as looking at how delivery of our functions impacts on those with protected characteristics.

The report will set out equality outcomes which we will work towards achieving and will update on progress against in our next report in two years' time.

4. Employment Information

Our workforce

Food Standards Scotland employed 161 staff as at 31 March 2016. Our staff carry out a wide range of functions, from Meat Hygiene Inspectors who work in Food Business Operator premises across Scotland, to policy staff, scientists, nutrition specialists, vets, communications staff, auditors and corporate services staff and staff who investigate food related criminal activity.

We have a statutory responsibility to carry out monitoring on the protected characteristics of our workforce. This allows us to identify any gaps or issues in our recruitment and employment practices and procedures and to find ways to try to address these. We monitor the characteristics of:

- staff leaving the organisation;
- staff joining the organisation during our recruitment process;
- staff during employment.

Appendix A provides a breakdown of workforce information in relation to each of the protected characteristics. Food Standards Scotland is committed to ensuring employees and job applicants are treated fairly and with dignity and respect; providing equality of opportunity; eliminating discrimination, harassment and bullying and creating a diverse workforce where the contribution of all staff is valued.



5. Food Standards Scotland as a Delivery Body

FSS was established on 1 April 2015. The first year of operations has focussed on establishing a clear direction for the organisation, ensuring continued delivery of core functions, whilst also expanding into new areas of work such as food crime. FSS's first Strategy and Corporate Plan are currently being finalised, and have been subject to wide stakeholder consultation and consumer engagement.

In addition, the first joint [National Food Crime Strategic Assessment](#) has been published with the Food Standards Agency. This highlights the potential risk to consumers arising from food crime, which may have particular impacts on at risk groups such as the young or elderly; pregnant women or specific ethnic or religious groups.

Significant work has also gone into the creation of the [FSS website](#) which has specific sections with information for particular groups including schools and the education sector, older people and pregnant women and children.

Examples of work undertaken during the year are given in Appendix B.

6. Equality Outcomes

Equality Outcome	Relevance to General Duty	Relevance to Scottish Government National Outcomes	Evidence used to assess impact
Development of FSS People Strategy	<ul style="list-style-type: none"> eliminate unlawful discrimination, harassment, victimisation and other prohibited conduct advance equality of opportunity foster good relations 	<ul style="list-style-type: none"> our public services are high quality, continually improving, efficient and responsive to local people's needs 	<ul style="list-style-type: none"> workforce data
Conduct Equality Impact Assessments when developing new policy	<ul style="list-style-type: none"> eliminate unlawful discrimination, harassment, victimisation and other prohibited conduct 	<ul style="list-style-type: none"> we have tackled the significant inequalities in Scottish society 	<ul style="list-style-type: none"> FSS segmentation data Food in Scotland Consumer Tracking Survey data
Mandatory e-learning package on equality and diversity to be included in induction package	<ul style="list-style-type: none"> eliminate unlawful discrimination, harassment, victimisation and other prohibited conduct advance equality of opportunity foster good relations 	<ul style="list-style-type: none"> our public services are high quality, continually improving, efficient and responsive to local people's needs we have tackled the significant inequalities in Scottish society 	<ul style="list-style-type: none"> workforce data

<p>Increase applications from younger and female applicants for MHI roles to address demographics</p>	<ul style="list-style-type: none"> • advance equality of opportunity 	<ul style="list-style-type: none"> • we have tackled the significant inequalities in Scottish society • we realise our full economic potential with more and better employment opportunities for our people 	<ul style="list-style-type: none"> • workforce data
<p>Improve quality of employee self-reporting of equality and diversity information</p>	<ul style="list-style-type: none"> • eliminate unlawful discrimination, harassment, victimisation and other prohibited conduct • advance equality of opportunity • foster good relations 	<ul style="list-style-type: none"> • our public services are high quality, continually improving, efficient and responsive to local people's needs • we have tackled the significant inequalities in Scottish society 	<ul style="list-style-type: none"> • workforce data
<p>Ensure that the needs of those with protected characteristics are considered during consumer engagement</p>	<ul style="list-style-type: none"> • eliminate unlawful discrimination, harassment, victimisation and other prohibited conduct • advance equality of opportunity • foster good relations 	<ul style="list-style-type: none"> • We live longer, healthier lives • we have tackled the significant inequalities in Scottish society • our children have the best start in life and are ready to succeed 	<ul style="list-style-type: none"> • FSS segmentation data • Food in Scotland Consumer Tracking Survey data

7. Equal Pay Statement

Food Standards Scotland is an equal opportunities employer and all staff should be treated equally irrespective of their sex, marital/civil partnership status, age, race, ethnic origin, sexual orientation, disability, religion or belief, working pattern, employment status, gender identity (transgender), caring responsibility, or trade union membership, and receive equal pay for doing equal work or work of equal value. Food Standards Scotland will operate a pay and reward system which is transparent, based on objective criteria and free from bias.

From 1 April 2016, staff within Food Standards Scotland have been offered, and the majority have accepted, Scottish Government Main (SGM) bargaining unit terms and conditions of employment. This means that Food Standards Scotland will pay staff in accordance with SGM pay grades and will apply SGM employment policies. Pay bargaining will be conducted as part of the wider SGM group. As part of its' commitment to equal pay, the Scottish Government has undertaken to:

- examine existing and future pay practices for all staff in SGM (including those who are absent on maternity leave and domestic career breaks) to ensure that they comply with best equal pay practice;
- carry out regular monitoring of the impact of these practices;
- inform employees of how these practices work and how their pay is arrived at; and
- provide training and guidance for those involved in making decisions about pay and benefits.

Through this action, the Scottish Government will aim to avoid unfair discrimination in its pay and reward system, to reward fairly the skills, experience and potential of all staff and act as a model employer for other organisations in Scotland. This equal pay policy statement has been agreed with the Council of Scottish Government Unions.

Gender Pay Gap information

The table below is based on headcount and shows the analysis of the average basic salary for male and female employees and shows the percentage pay gap as at 31 March 2016. Due to the small numbers of staff in certain grades, numbers below 5 have been suppressed and are shown as * to protect individual confidentiality.

Food Standards Scotland defines the gender pay gap as the difference in mean full-time equivalent earnings for men and women. The mean is the sum of basic salaries for each person divided by the number of people.

The national (UK) figure for the gender pay gap is 9.4% in 2015 (source: Annual Survey of Hours and Earnings, 2015, Office of National Statistics, median full-time hourly earnings excluding overtime).

Within Food Standards Scotland, where men and women are undertaking work of an equal value (i.e. within the same pay range) they are paid a similar annual salary within the pay band and consequently the pay gap is low as can be seen in the table

below. However, staff have not had access to pay progression for a number of years and therefore there are historic pay differentials which continue to exist.

There is no overall pay gap within Food Standards Scotland, although there are some differences at specific grades. The highest gap is 6.9% at EO level. One reason for this is the high proportion of long serving male staff, mainly Meat Hygiene Inspectors, in the EO grade who are at the maximum of the pay band. The adoption of Scottish Government Main bargaining unit terms and conditions of employment from 1 April 2016 should help to address the pay gaps by enabling staff to progress through the pay band. By ensuring that processes for recruitment and selection and promotion are free from gender bias, we should also help to reduce the areas of identified gender pay gap within Food Standards Scotland.

Substantive Grade	Female		Male		F/M Ratio
	No.	Average	No.	Average	
FSS - AO	*	*	*	*	*
FSS - EO	19	£23,380	62	£25,109	93.1%
FSS - G6	*	*	*	*	*
FSS - G7	*	*	*	*	*
FSS - HEO	19	£28,083	10	£27,526	102.0%
FSS - SEO	11	£35,901	16	£37,440	95.9%
SCS - Deputy Director 1	*	*	*	*	*
SCS - Director	*	*	*	*	*
All Staff	63	£29,556	98	£29,431	100.4%

Appendix A – Employment Monitoring Data

Workforce Composition

The information provided in this section of the report is taken from our Human Resources Management Information System and is valid as at 31 March 2016. On that date, we employed 161 members of staff.

In all tables, numbers less than 5 are not disclosed to protect individual confidentiality and are marked as *. Information not provided denotes that a member of staff has not supplied information; prefer not to say denotes that a member of staff has chosen not to provide information.

Explanation of pay grades

Grade	Description
AA/AO	Administrative grades
EO	Executive Officer grades
HEO/SEO	Higher and Senior Executive Officer grades
G6/7	Management grades
SCS	Senior Civil Service grades

	Headcount	Percentage	Civil Service Percentage (as at 31.3.15)
AO/AA	10	6.2%	38%
EO	81	50.3%	25%
SEO/HEO	56	34.8%	23%
G6/7	12	7.5%	9%
SCS	2	1.2%	1%
Not reported	0	0%	3%
All	161	100.0%	100%

In the Civil Service as at 31 March 2015 around 38% of the Civil Service worked at the Administrative responsibility level (AO/AA), 25% worked at the Executive Officer level (EO), 23% worked at Higher or Senior Executive Officer level (HEO/SEO) and 9% worked at Grade 6 or 7 level (G6/7). The remaining 1% worked at Senior Civil Service level (SCS) with 3% in the 'not reported' category.

In March 2016, 50.3% of the FSS workforce were at EO level. This is much higher than the Civil Service average, due to the fact that 40% of our overall workforce are Meat Hygiene Inspectors, who are paid on the EO scale.

The specialist nature of many of the posts within the organisation, such as scientific staff, communications and marketing specialists, nutritionists and investigative staff also helps to explain the lower percentage of staff at AA/AO level and the higher number of staff at SEO/HEO grades.

Table 3 - Gender						
Grade	Headcount and row percentage					
	Gender					
	Female		Male		All employees	
AO/AA	*	*	*	*	10	100.0%
EO	19	23.5%	62	76.5%	81	100.0%
SEO/HEO	30	53.6%	26	46.4%	56	100.0%
G6/7	6	50.0%	6	50.0%	12	100.0%
SCS	*	*	*	*	2	100.0%
All employees	63	39.1%	98	60.9%	161	100.0%

The disproportionately high number of males in the EO grade reflects the large proportion of Meat Hygiene Inspectors (MHIs) in this grade (73% of all EO grade staff in FSS). The Meat Hygiene profession has historically been male dominated and is one where there has been limited staff turnover. Only 9% of MHIs in FSS are female.

Table 4 - Age														
Grade	Headcount and row percentage													
	Age Group													
	16-29		30-39		40-49		50-54		55-59		60+		All employees	
AO/AA	5	50.0%*	*	*	*	*	*	*	*	*	*	*	10	100.0%
EO	6	7.4%	7	8.6%	33	40.7%	16	19.8%	14	17.3%	5	6.2%	81	100.0%
SEO/HEO	*	*	14	25.0%	15	26.8%	9	16.1%	8	14.3%	*	*	56	100.0%
G6/7	*	*	*	*	7	58.3%	*	*	*	*	*	*	12	100.0%
SCS	*	*	*	*	*	*	*	*	*	*	*	*	2	100.0%
All employees	17	10.6%	23	14.3%	58	36.0%	26	16.1%	27	16.8%	10	6.2%	161	100.0%

Relatively low staff numbers across the organisation mean that significant amounts of data are suppressed to prevent the possible disclosure of information about individuals. Overall, almost 40% of the workforce is aged 50 or over.

Table 5 - Work pattern		
	Headcount	Percentage
Full-time	150	93.2%
Part-time	11	6.8%
All	161	100.0%

FSS supports a number of flexible working patterns and all employees are able to apply to work flexibly. This includes job sharing, part-time working, compressed hours and partial retirement.

Table 6 - Disability		
	Headcount	Percentage
Disabled	*	*
Not disabled	10	6.2%
Prefer not to say	*	*
Not known	146	90.7%
All	161	100.0%

Very low levels of data have been supplied by staff to enable meaningful reporting in this category. Improving the quality of self-reported data will be a key outcome for the next reporting period.

Table 7 – Ethnic Group		
	Headcount	Percentage
Ethnic minority	*	*
White	41	25.5%
Prefer not to say	*	*
Not known	116	72.0%
All	161	100.0%

Very low levels of data have been supplied by staff to enable meaningful reporting in this category. Improving the quality of self-reported data will be a key outcome for the next reporting period.

Table 8 – Marital/Civil Partnership Status												
Headcount and row percentage												
Grade	Marital/Civil Partnership Status											
	Married		Single		Other status		Prefer not to say		Not known		All employees	
AO/AA	*	*	*	*	*	*	*	*	7	70.0%	10	100.0%
EO	16	19.8%	16	19.8%	*	*	*	*	44	54.3%	81	100.0%
SEO/HEO	14	25.0%	7	12.5%	*	*	*	*	29	51.8%	56	100.0%
G6/7	*	*	*	*	*	*	*	*	*	*	12	100.0%
SCS	*	*	*	*	*	*	*	*	*	*	2	100.0%
All employees	33	20.5%	27	16.8%	10	6.2%	4	2.5%	87	54.0%	161	100.0%

The following have been grouped into the 'Other status' category: civil partnership, divorced, domestic partner, legally separated, living together, separated, and widowed.

A significant number of staff have not reported information in this category. Improving the quality of self-reported data will be a key outcome for the next reporting period.

Table 9 – Sexual Orientation		
	Headcount	Percentage
Lesbian, Gay, Bi-sexual and other	*	*
Heterosexual/straight	43	26.7%
Prefer not to say	*	*
Not known	115	71.4%
All	161	100.0%

Very low levels of data have been supplied by staff to enable meaningful reporting in this category. Improving the quality of self-reported data will be a key outcome for the next reporting period.

Table 10 – Religion or Belief		
	Headcount	Percentage
Christian	18	11.2%
Other religion or belief	*	*
No religion or belief	21	13.0%
Prefer not to say	*	*
Not known	115	71.4%
All	161	100.0%

Very low levels of data have been supplied by staff to enable meaningful reporting in this category. Improving the quality of self-reported data will be a key outcome for the next reporting period.

Leavers

During the period 1 April 2015 – 31 March 2016, 15 permanent or fixed term staff left FSS. The low numbers mean that most of the analysis against the protected characteristics cannot be published due to data suppression. The figures which can be reported are noted below.

Table 11 - Gender		
	Headcount	Percentage
Female	10	66.7%
Male	5	33.3%
All	15	100.0%

Table 12 - Age		
	Headcount	Percentage
16-29	5	33.3%
30-39	*	*
40-49	*	*
50-54	*	*
55-59	*	*
60+	*	*
All	15	100.0%

Table 13 - Work pattern		
	Headcount	Percentage
Full-time	14	93.3%
Part-time	1	6.7%
All	15	100.0%

Table 14 - Grade		
	Headcount	Percentage
AO/AA	1	6.7%
EO	8	53.3%
SEO/HEO	6	40.0%
G6/7	0	0.0%
All	15	100.0%

Recruitment

All job applications are monitored centrally by our resourcing team who liaise with recruiting line managers to ensure that reasonable adjustments are applied during and after the recruitment process. The following data represents all job applicants from 1 April 2015 until 31 March 2016.

In line with employment legislation and best practice we are committed to equality of opportunity in employment, both in principle and in practice. It is our policy to ensure that no job applicant or employee receives less favourable treatment, either directly or indirectly, on grounds of age, race, disability, sex, marital status, pregnancy/maternity, gender reassignment, religion or belief or sexual orientation, therefore equality information is not shared with recruiting managers. We are part of the Positive About Disabled People Scheme and offer guaranteed interviews to applicants who indicate that they are disabled and who meet the minimum criteria for vacant posts and ensure that reasonable adjustments are made to the recruitment and selection process where necessary.

Our recruitment system does not hold any equal opportunity information relating to gender re-assignment and therefore this protected characteristic has been excluded.

Information on Applicants for Posts

Applications	Not Specified	16 - 20	21 - 30	31 - 40	41 - 50	51 - 60	61 - 65	over 65
470	458	4	4	2	2	0	0	0
%	97.45	0.85	0.85	0.43	0.43	0	0	0

The majority of applicants did not declare their age.

Applications	Not Specified	Female	Male
470	2	297	171
%	0.43	63.19	36.38

Almost two thirds of applicants for posts in FSS were female.

Table 17 – Grades of Posts Applied For						
Applications	AO	EO	HEO	SEO	G7	G6
470	76	107	177	87	11	12
%	16.17	22.77	37.66	18.51	2.34	2.55

Table 18 - Disability			
Applications	Not Stated	Able	Disabled
470	6	412	52
%	1.28	87.66	11.06

The majority of applicants did not consider themselves to have a disability. Where applicants declare a disability, FSS offers a guaranteed interview to those applicants who meet the minimum criteria for the post.

Table 19 - Ethnicity							
Applications	White	Asian, Asian Scottish or Asian British - Other	African, Caribbean or Black - Other	Other Ethnic Group	Mixed or Multiple Ethnic Group	Other Ethnic Background	Prefer Not to Say
470	409	23	26	2	5	1	4
%	87.02	4.89	5.53	0.43	1.06	0.21	0.85

Table 20 - Religion						
Applications	None	Church of Scotland	Roman Catholic	Other Christian	Muslim	Buddhist
470	253	82	28	53	9	1
%	53.83	17.45	5.96	11.28	1.91	0.21
	Sikh	Jewish	Hindu	Pagan	Other	Prefer Not to Say
	0	1	14	1	5	23
%	0	0.21	2.98	0.21	1.06	4.89

Table 21 – Sexual Orientation						
Applications	Gay woman/lesbian	Gay man	Bisexual	Heterosexual/straight	Other	Prefer not to say
470	0	8	11	430	1	20
%	0.00	1.70	2.34	91.49	0.21	4.26

Appendix B

Equality in Communications and Marketing

In order to deliver an effective communications and marketing strategy which genuinely places consumer interests at its heart, Food Standards Scotland has in its first year undertaken several pieces of work aimed at deriving a better understanding of the needs and wants of all consumers, including those with protected characteristics. This work is roughly divided into three complementary and intertwined strands:

1. Understanding the Public
2. Co-designing Interventions
3. Ensuring Accessibility

Understanding the Public

FSS has undertaken two large-scale quantitative studies of the Scottish population designed to further our understanding of all sectors of society and their knowledge, attitudes and behaviour in relation to our core consumer-facing areas of responsibility: food safety, food authenticity and healthy eating.

The Food in Scotland Consumer Tracking Survey is a snapshot from a representative sample of the Scottish public (c1000 respondents). The first wave of the Survey was undertaken during the first year of FSS, and provides a benchmark of opinions and views which future planned waves will track over time. This information underpins FSS's corporate strategic approach and communications and marketing activity, as well as policy development and delivery. The Survey, independently administered by TNS-BMRB, includes a standard set of diversity and equality questions to ensure the sample is fully representative.

The results of the survey also feed into the second study – the FSS Segmentation which models the entire Scottish population to allow for a more targeted approach which recognises the needs of different sectors of society. The segmentation draws on a number of data sources, and is founded upon the MOSAIC classification, which is a rich and recognised household classification system, which allocates every one of Scotland's 2.3 million households into one of 15 Groups and 66 detailed Types. MOSAIC builds a picture of the demographics, lifestyles, preferences and behaviours of the Scottish adult population which FSS have overlayed with robust data relating to food safety and healthy eating. This segmentation will be used to better inform all of FSS's consumer-facing activity over the coming years.

Co-designing Interventions

Both the quantitative approaches outlined above and qualitative insight gathering work designed to engage with the public and stakeholder audiences on a deeper level are being used by FSS to develop corporate plans, policy and communications directed to where it is most needed.

Recent work includes:

Food Hygiene Information Scheme (FHIS) Consumer Engagement. A full review of the existing scheme with constructive suggestions for improvement undertaken amongst consumer groups. This work will feed into the development of the scheme and associated communications and marketing to raise awareness of it and its benefits, both to consumers and to responsible food businesses.

Education Sector Primary Schools Resources. Engagement with teachers to review existing resources, both from FSS and others, and to identify the best means of supporting teachers in educating children via the Curriculum for Excellence about food safety and healthy eating.

Healthy Eating Marketing Campaign Qualitative Insight. 'Follow the Families' work gathered in-depth information from Scottish families to assist development of a forthcoming campaign designed to encourage the reduction of so-called 'discretionary foods' (cakes, biscuits, pastries, chocolate, sugar-sweetened drinks, crisps and savoury snacks) in the Scottish diet.

FSS Strategy and Corporate Plan: Stakeholder Forums, Public Consultation and Consumer Engagement. This wide-ranging work has informed development of FSS's strategy and three-year plan to ensure the voices of all sectors have the chance to be heard.

Marketing Campaigns and Evaluation. Since launch, FSS has run two marketing campaigns designed to encourage consumer uptake of certain behaviours, particularly in relation to food safety. Look at the Label and the Festive Food Safety Campaign - 'The last thing on anyone's list is food poisoning' - targeted food decision-makers in mid to lower socio-economic groups, and particularly those in more 'at risk' groups when it comes to food safety such as the elderly and pregnant women. Media channels were selected to reach these audiences. The findings from the evaluations of these campaigns will feed into future activity.

Ensuring Accessibility

The Equality Act 2010 (EQA) states in Section 20(6):

"the steps which it is reasonable for [an information service provider] to have to take include steps for ensuring that in the circumstances concerned the information is provided in an accessible format."

The EQA notes that the *"the duty to make reasonable adjustments requires service providers to take positive steps to ensure that disabled people can access services."*

The FSS website, launched in April 2015, has been designed to comply with the international web accessibility standards issued by the World Wide Web Consortium (W3C) as part of their Web Accessibility Initiative.

This means we have to:

- provide text alternatives for non-text content.
- provide captions and other alternatives for multimedia.
- create content that can be presented in different ways, including by assistive technologies, without losing meaning.
- make it easier for users to see and hear content.
- make text readable and understandable.
- make content appear and operate in predictable ways.

All reasonable effort has been made to ensure that as much of the website as possible meets the 'AA' standard as set out in the Web Accessibility Initiative guidelines, where it is possible and reasonable to do so. We provide contact details for users who need additional accessibility features.

The site conforms to all accessibility guidelines not only in terms of disabled access, but in terms of giving unhindered access to a website from various devices, such as web-enabled televisions and mobile phones and in giving access to users who have different screen sizes, browser types and settings, or those who do not have plug-ins such as Flash.

User testing amongst all key groups, including stakeholders, staff and consumers, is underway to improve upon the existing website and inform future digital communications from FSS.