



**CROFTING COMMISSION  
COIMISEAN NA CROITEARACHD**

# **CROFTING COMMISSION EQUALITY & DIVERSITY PLAN**

**VERSION 0.6**

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## **INTRODUCTION**

The Crofting Commission believe that no-one should be denied opportunities because of their race or ethnicity, a disability, their sex, their gender reassignment or sexual orientation, their marital or civil partnership status, their age or religion, or due to any of the protected characteristics detailed in the Equality Act.

Both staff working for the Crofting Commission and our customers should be treated equally and fairly. For staff this commitment also extends to maternity status, working pattern, employment status, caring responsibility and trade union membership.

Under the Equality Act 2010, as a Scottish public authority, the Commission is required to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Though listed in Schedule 19 of the Act covering the general equality duties, the Commission is not subject to reporting obligations under the additional 'specific duties' regulations.

## **BACKGROUND**

The public sector equality duty came into force on 05 April 2011. The purpose of the duty is to ensure that public authorities consider how they positively contribute to a more equal society. It requires authorities to consider equality in all their functions, including decision-making, design and delivery of services.

From 01 October 2012 the scope of the Act was extended to ban age discrimination, though this does not presently cover people under the age of 18.

To date, the Crofting Commission has taken guidance on Equality issues from Scottish Government and has followed the policies adhered to by the government. This is especially relevant to our staff who are all civil servants employed by Scottish Government. In late 2015 however, the Commission undertook a Best Value Review, conducted by auditors Scott-Moncrieff. One of the outcomes of the Review was a recommendation that, although the organisation can demonstrate a range of initiatives in the area of equality and diversity, the drawing together of an overarching Equality Plan would be of benefit.

The aim of the Equality and Diversity Plan is to demonstrate the Crofting Commission's commitment to the Scottish Government's equalities agenda, mitigate the risk that equalities activities are not prioritised and align them with budgets and resources to cover short and medium-term objectives.

## **THE GENERAL EQUALITY DUTY**

Under the Equality Act 2010, public authorities are required to have due regard to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct
2. Advance equality of opportunity between people who share a relevant protected characteristic and those who do not
3. Foster good relations between people who share a protected characteristic and those who do not.

This duty is often referred to as “the three needs”. To comply with the duty, a public authority must have due regard to all three of these needs.

The Act explains that to meet the second need (advancing equality of opportunity), a public authority must consider the need to:

- Remove or minimise disadvantage suffered by people with certain protected characteristics, where these are different from the needs of other people
- Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The Act also sets out that:

- Meeting different needs includes (among other things) taking steps to take account of disabled people’s disabilities
- Fostering good relations means tackling prejudice and promoting understanding between people from different groups
- Meeting the general equality duty may involve treating some people more favourably than others.

## **WHO SHOULD BE AWARE OF THE GENERAL DUTY IN THE CROFTING COMMISSION?**

### **Board Members**

They set strategic direction, review performance and must ensure good governance of the organisation. The Convener is also appraised against a Diversity Objective for the Board.

### **Senior Managers**

They oversee the design, delivery, quality and effectiveness of the organisation’s functions.

## **Equality and Diversity Staff**

Their role in raising awareness and building capacity about the general duty. The Equality Lead in the Commission is the Head of Compliance.

## **Communications Staff**

They can help ensure relevant equality information is available and accessible.

## **Data Analysts**

They can help support the organisation in understanding how to measure the effect of its policies and practices on people from equality groups.

## **Frontline Staff**

They need to be aware of how they can help to meet the needs of people from equality groups.

## **Procurement Staff**

They need to be aware of how to build equality considerations into the organisation's supply chain. In the Commission, anyone tendering a contract should be aware of the Equalities Obligation.

## **Line Managers**

They need to ensure appropriate reference is made to HR services so that equality practices are reflected in employment policies and procedures.

## **KEY COMMISSION DOCUMENTS**

The primary function of the Crofting Commission is to regulate crofting. In all of the Commission's key documents we recognise that regulation is one tool to help support, promote and underpin crofting and that, with no direct development role, the Commission has limited powers to deliver sustainable development. It can, however, use its functions and relationships to contribute to the Scottish Government's aims for a more equal society.

The key references are:

- [The Policy Plan](#)
- [Corporate Plan](#)
- [Business Plan](#)
- [Gaelic Language Plan](#)

## **POLICY PLAN**

The Commission recognises that by working with others, such as HIE and local authorities, and utilising its regulatory functions, such as Succession, it can promote the wider community benefits of crofting, which include population retention, the retention of Gaelic culture within Gaelic-speaking communities and affordable housing solutions, to allow young people to remain in crofting communities.

## **CORPORATE PLAN**

The Vision set out in the Corporate Plan identifies the integral part played by crofting in population retention in rural areas, and how the Commission, through decision-making, is able to support individuals and communities. By using its powers, the Commission will regulate to encourage the active use of crofts and common grazings, which will contribute to the Scottish Government's National Outcomes and help create strong, resilient and supportive communities.

## **BUSINESS PLAN**

The Commission will improve its evidence base by utilising the Croft Information System and the returns from the Crofting Census to strengthen its understanding of the communities it serves. This improved data will be reflected in enhanced information displayed in the Annual Report and online. Stronger management information will enable the Commission to consider how it can better meet the general equality duty.

## **GAELIC LANGUAGE PLAN**

The Commission's Gaelic Language Plan forms part of the Induction process for all new staff and carries with it a range of practical commitments, which are reviewed quarterly by senior management and annually by the Board.

The Gaelic language has helped shape crofting over generations and the Commission is committed to doing all it can to encourage and promote the place of Gaelic in Scottish life.

## WHAT WE DO – CUSTOMER FACING ACTIONS (CFA)

CFA Ref	Action Completed	General Equality Duty	Owner	Review Update
<b>CFA01</b>	Mentoring young people – participation on Boards. Exercise undertaken in 2015/16 with Commissioners/ CEO and two young crofters. In line with SG Public Boards and Corporate Diversity aims, to improve the percentage of women and other under-represented groups in leadership roles in Scotland, to reflect the broader population by 2020.	<ul style="list-style-type: none"> <li>• Advance Equality of Opportunity</li> <li>• Foster Good Relations</li> </ul>	CEO	Participation by young people considered by Board in May 2019. To be taken forward as part of the Young Person's Strategy (Comms). Significant progress following on from STWG on Women on Board.
<b>CFA02</b>	Revision of Code of Conduct for Assessors, with text taken from Equality and Human Rights Commission, aligned to Scottish Government policies on equal opportunities and diversity. Communicated to all Assessors and included in Induction Pack and on website.	<ul style="list-style-type: none"> <li>• Eliminate Discrimination</li> <li>• Advance Equality of Opportunity</li> <li>• Foster Good Relations</li> </ul>	Head of Compliance	Code of Conduct reviewed on an annual basis for Assessors and Commissioners.
<b>CFA03</b>	Amendments to website to create clearer visual communication, addition of audio/video and social media platforms, to increase accessibility and reduce barriers to young people and people with disabilities. Best practice guidance on design also utilised for Annual Report and other publications, with the provision of alternative formats on request.	<ul style="list-style-type: none"> <li>• Eliminate Discrimination</li> <li>• Foster Good Relations</li> </ul>	Head of Compliance	<p>Increased use of social media platforms, including reaching out to Gaelic speakers via Twitter/Facebook and videos.</p> <p>Accessibility regulations now in force (from Sept 2020) and website refresh project completed. Accessibility testing complete. Report recommendations to be acted on by xx to gain accreditation.</p>
<b>CFA04</b>	Improvements to application forms and guidance, refinements on Crofting Census forms, review of letters as part of CIS process, all designed to be clear and accessible.	<ul style="list-style-type: none"> <li>• Advance Equality of Opportunity</li> <li>• Foster Good Relations</li> </ul>	Head of Compliance & Head of Operations	Form re-designed to create clearer text and higher contrast for people with visual impairment. Increase in visibility of Gaelic on common forms, carried through into the online applications project.
<b>CFA05</b>	Crofting Roadshows and Election Roadshows undertaken in accessible venues, with as wide a geographic spread as possible, bi-lingual advertising in Gaelic-speaking communities.	<ul style="list-style-type: none"> <li>• Advance Equality of Opportunity</li> <li>• Foster Good Relations</li> </ul>	Head of Compliance	On hold temporarily due to meeting restrictions. Due to recommence Autumn/Winter 2021/22, with check made re accessibility.
<b>CFA06</b>	'Equality check' carried out on Board papers and all publications/key documents to ensure written communication is gender neutral	<ul style="list-style-type: none"> <li>• Eliminate Discrimination</li> </ul>	Head of Compliance	Complete
<b>CFA07</b>	Equality clauses added to all contracts as part of tendering/procurement process and submissions measured against equality criteria.	<ul style="list-style-type: none"> <li>• Advance Equality of Opportunity</li> <li>• Eliminate Discrimination</li> </ul>	Head of Compliance	Standard clause added
<b>CFA08</b>	Great Glen House is an accessible building with a portable induction loop. The Commission promotes such provision through its service level agreement with SNH.	<ul style="list-style-type: none"> <li>• Foster Good Relations</li> </ul>	Head of Compliance	MOTU reviewed. Callers to office who prefer to use Gaelic will be dealt with by Gaelic speaking officer when the office fully re-opens.
<b>CFA09</b>	Opportunities to encourage diversity of Board and create dialogue with under-represented groups (specifically women and young people) through interaction with SCF Young Crofters, Fencing for Women and Women in Agriculture	<ul style="list-style-type: none"> <li>• Advance Equality of Opportunity</li> </ul>	CEO/Head of Compliance	STWG established on Women on Boards and virtual Board meetings opened up to wider audience including BnG and Assessors.

## WHAT WE DO TO PROMOTE EQUALITY – ACTIONS WITH STAFF (SA)

SA Ref	Action Completed	General Equality Duty	Owner	Review Update
SA01	Engaged with SG Modern Apprenticeship programme, offering places to two young people, including an individual with a disability that placed him at a significant disadvantage in the job market. Both went on to secure permanent employment outside the Commission.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> </ul>	CEO	On hold during current restrictions. Included in Workforce Plan and to be considered as part of Workforce Review.
SA02	Developed relationship with local social enterprise, using business facility for 3 x all staff training days and engaging directly with participants with disabilities. Has led to direct links between the social enterprise and staff.	<ul style="list-style-type: none"> <li>• Foster good relations</li> </ul>	CEO	Relationship has continued by using venue and working with staff for successful 2018 Away-Day. No Away-day since 2018.
SA03	Role of Equality & Diversity officer located within Senior Management Team, reflecting priority given to agenda and locating budget resources (Comms and Training) with relevant budget holder	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> </ul>	Head of Compliance	Complete
SA04	Specific diversity training arranged for Convener in line with requirements of Public Bodies Unit.	<ul style="list-style-type: none"> <li>• Eliminate discrimination</li> </ul>	Head of Compliance	Completed training session with Anne Donald. Convener forwarded details of Mentoring Project for potential Board chairs, aimed at improving opportunities for people with disabilities. Diversity Awareness training delivered to staff. Unconscious Bias training delivered to Board.
SA05	Gaelic Language Plan approved with detailed targets and commitments, with responsibility held at Senior Management level, helping to promote language and culture of particular relevance to the Commission's staff and customers.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>	Head of Compliance	Much work completed in 2018-20 to promote and encourage Gaelic language skills in workplace. Awareness training delivered twice yearly since 2017. Classes in Gaelic delivered since 2018. New edition of GLP approved in late 2020.
SA06	All staff are required to achieve a diversity objective as part of their annual performance appraisal	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>	Head of Compliance	Access to variety of eLearning resources promoted to all staff and HoC attended Equalities workshop in October 2018, focused on opportunities for women on Boards. Diversity objective now to include key reference to Commission's zero tolerance approach to bullying in the workplace.
SA07	In addition to the above, Commission staff have Gaelic included within the diversity objective, so all are asked to record how they engage with the Commission's commitments in the GLP.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> </ul>	Head of Compliance	Staff survey undertaken, with positive results, reported to BnG. Weekly language training sessions.
SA08	All staff complete diversity and equality training as part of their annual mandatory objectives. This is either delivered via a course or by completing modules for the Civil Service.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> </ul>	Head of Compliance	Mandatory training also highlighted to Commission staff for completion. Online training for Commissioners being sourced (as at Sept 2021) and new way of delivering training to all staff under investigation.



SA Ref	Action Completed	General Equality Duty	Owner	Review Update
SA09	Information on Equality & Diversity is included in the Staff Handbook and forms part of the Induction for new staff.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Compliance	Induction Pack and Staff Handbook being revised and updated, deadline for completion is Oct 2021.
SA10	Specific training sessions have been delivered to cover Autism in the workplace	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>	Head of Compliance	Diversity Awareness training day for all staff organised in January and March 2019. Access to new online modules under investigation.
SA11	Adhere to SG HR policies on equality and diversity in the workplace, including work-life balance and recruitment.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> </ul>	Head of Compliance	Monthly Conversations between staff and line managers include specific reference to wellbeing and all staff have completed a Wellbeing review with line managers following the coronavirus pandemic.
SA12	Monthly Conversations take place between staff and line managers and include specific reference to wellbeing to allow any concerns to be acted on.	<ul style="list-style-type: none"> <li>• Foster good relations</li> <li>• Eliminate discrimination</li> </ul>	Head of Compliance	Availability of Wellness Action Plans promoted to staff, including line manager training in September 2018. Covid Wellbeing forms part of MC from Sept 2020. Variety of actions taken forward on wellbeing by Staff Engagement Group, including delivery of several Mindfulness sessions, access to training on wellbeing and stress management and direct delivery of resilience in the workplace training.
SA13	Recognition of need to increase awareness of mental health issues as Equality issue.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Compliance	Mental Health First Aider training provided to 10 x staff members. HoC and HoO attended 2 x workshops on Mental Health in Workplace. Support taken forward by SEG. New Resilience sessions being designed in-house for staff.
SA14	The Commission adheres to the SG Fairness at Work policy, which covers equality and diversity.	<ul style="list-style-type: none"> <li>• Foster good relations</li> <li>• Eliminate discrimination</li> </ul>	Head of Compliance	Training session for staff delivered by Inclusion Scotland in early 2019. Visits by HR to deliver all-staff information in June 2019 and in 2020. Further session planned for Oct 2021, focus on preventing bullying, following on from independent review of bullying and harassment.
SA15	As part of the shared service agreement with SNH, the Commission promotes best practice in making sure the office space is suitable for people with differing needs, for instance with a portable induction loop, bi-lingual signing and disabled access to the building.	<ul style="list-style-type: none"> <li>• Foster good relations</li> <li>• Eliminate discrimination</li> </ul>	Head of Compliance	MOTU and Shared Service Agreement with SNH reviewed.
SA16	Take part in research project on diversity in NDPBs	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> </ul>	Head of Compliance	First part of research completed

## **SCOTTISH GOVERNMENT HR POLICIES ON EQUALITY & DIVERSITY** *(adhered to by the Crofting Commission)*

Induction procedures within the Commission are designed to ensure diversity issues are included and staff are aware of a range of advice, guidance and support provided by SG HR officers.

### **EQUAL OPPORTUNITIES POLICY STATEMENT**

All staff should be treated equally irrespective of their sex, marital/civil partnership status, maternity status, age, race, ethnic origin, sexual orientation, disability, religion or belief, working pattern, employment status, gender identity, caring responsibility or trade union membership.

### **DIVERSITY POLICY STATEMENT**

The Scottish Government is committed to increasing the diversity of staff within the organisation. We will develop all our staff, ignoring all irrelevant differences in their management and development. Furthermore, we will positively value the different perspectives and skills of all staff and make full use of these in our work.

### **RESOURCES AVAILABLE ON DIVERSITY & EQUALITY**

- Diversity on eHR
- Diversity Objectives
- Diversity Training
- Line manager's diversity toolkit
- Caring for someone – advice for carers
- Work-life balance
- Flexi policy and working patterns (flexible working)
- Equality staff networks
- Prayer groups and facilities (a prayer room is available in GGH and a prayer group meets here)
- Inclusive communication
- How we can support disabled staff
- How we show we are positive about disabled people
- How staff can access the Employee Assistance Programme to support wellbeing.

## FORWARD PLANNING

Active consideration of equality will help the Commission to identify ways in which to improve evidence gathering and engagement, to help improve the quality of services it provides, making them more responsive to customer and staff needs, leading to better outcomes.

Senior Managers and Commissioners have a vital role to play in giving a clear and consistent message about the importance of promoting equality and diversity. Through visible leadership the senior management team ensures that equality is reflected in performance reporting, that staff are clear the Commission adopts a zero-tolerance approach to discriminatory behaviour and builds the capacity of all staff to consider and promote the equality duties.

In addition to the work currently undertaken, the Commission will use the following:

- **Staff Satisfaction Surveys** – building on the twice-yearly survey (reported and measured as a KPI) and the SG data gathering, to provide improved data on staff wellbeing; noting that because of the size of the organisation, anonymising information from staff surveys is challenging.
  - Consider results of management surveys as well as staff survey
- **Customer Journey-Mapping** – design a mapping exercise to test whether the Crofting Census creates barriers for some people with protected characteristics and how these might be mitigated.
  - 2019 Review Update – Head of Compliance acted on comments from a customer with visual impairment, ensuring action was taken to improve accessibility of the census form. Customer-journey mapping not yet carried out. Feedback exercise to be built into the 2019 crofting census wash-up in 2020.
  - 2021 Review Update – no negative feedback regarding accessibility of 2020 Crofting Census. This action point has been superseded by website accessibility requirements and the decision to move to digital-only census forms. It is therefore essential to gain Accessibility Accreditation to prevent the move online creating potential barriers for disabled people.
- **RoC Online** – using predicted improved engagement with customers to measure whether putting the RoC online reduces access barriers and reviewing the impact this has, to see whether it could lead on to further innovations.
  - 2019 Review Update – no adverse impacts recorded from development of RoC online. Positive impact recorded by increasing 24hr accessibility of information.

- Improved access ongoing as decrofting directions and apportionment orders are added.
- **Assessor Network** – ensure equality outcomes are considered so that recruitment to the new panel of Assessors is promoted to under-represented groups as a volunteering opportunity.
  - 2018 Review Update – recruitment to current panel took into account accessibility issues, by ensuring roadshows took place in accessible venues, Code of Conduct for Assessors included equalities provisions and recruitment opportunities were advertised via third sector platforms.
- **Review** how the Commission uses data from the Crofting and Grazings Census and the RoC to build a picture of diversity in crofting communities and how, by working with partners, the Commission can contribute to wider public benefits.
  - 2019 Review Update – action outstanding. Head of Compliance to consider how data could be anonymised.
  - 2021 Review Update – without a clear purpose for processing extra personal data, the exercise would not be GDPR compliant. An alternative way to take this forward would be to use the framework of the National Development Plan for Crofting and the Scottish Government’s strategic focus on Women in Agriculture, to see how the data held by the Commission can contribute to the delivery of these objectives.
- **Induction Training Programme** – ensure equality and diversity is given an appropriate profile in the early training delivered to new Board members, for 2022.

## PROTECTED CHARACTERISTICS

### Protected Characteristics

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

## EQUALITY &amp; DIVERSITY PLAN – ACTION PLAN (AP)

AP Ref	Action	General Equality Duty	Owner	2020 Update	2021 Update
AP01	Staff satisfaction survey – use to provide data on bullying and harassment, wellbeing and opportunities. Compare data in-year and with SG People Survey. Consider adding question to survey to seek staff ideas on improving diversity.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Operations & Workforce	2020 survey completed in Sept. Independent body to consider results on bullying. SMT working with Staff Engagement group to prioritise critical areas. HoC will review results and add question on diversity to 2021 survey.	Focus following 2020 survey has been completing independent review of Bullying & Harassment and creating associated Action Plan to embed change improvements, now coming into place, coupled with a necessary focus on staff Wellbeing, including WFH surveys.
AP02	Design customer journey mapping exercise to test whether present format of Crofting Census creates barriers and how these might be mitigated.	<ul style="list-style-type: none"> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Digital & Improvement	Feedback exercise overdue. HoC to ensure customer feedback recorded for 2019 returns and to design customer consultation, with HoD&I.	No negative customer feedback on accessibility in 2019/20. Focus for 2021 is now on ensuring ease of access for digital only returns by gaining Accessibility Accreditation for website.
AP03	Does the RoC online reduce access barriers to customers – e.g. they do not need to phone or write to us to access information?	<ul style="list-style-type: none"> <li>• Foster good relations</li> </ul>	Head of Digital & Improvement	Increased access delivered -decrofting directions Oct 2019 and apportionment orders – 2020.	Increased access delivered - decrofting directions Oct 2019 and apportionment orders – 2020.
AP04	Ensure recruitment to new Assessor panel is promoted as volunteering opportunity to people with protected characteristics – use volunteer networks.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>	Head of Business Support & Compliance	Panel in place until 2023	Panel in place until 2023
AP05	How can CC use data from Crofting Census, grazings census and RoC to build up a picture of diversity in crofting communities, while respecting DPA requirements?	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> </ul>	Head of Business Support + Crofting Development team	HoC and HoDI to consider objective and how it can be delivered	Consider the role of the data held by the Commission in delivery of National Development Plan for Crofting and the Scottish Government's strategic objectives for Women in Agriculture. Engage via the Crofting Development team.

AP Ref	Action	General Equality Duty	Owner	2020 Update	October 2021 Update
AP06	Equality & Diversity given high profile in Year-1 training for Commissioners and specific diversity training completed by Convener.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>	Head of Compliance	<p>Diversity Awareness training delivered Jan/March 2019. Unconscious Bias training delivered in Nov 2020.</p> <p>STWG established on Women on Boards aimed at promoting opportunities to women interested in sitting on Board</p>	Investigating ways to access greater selection of training online, with LDO, for staff and Commissioners. Commissioners to be given access to Public Bodies Unit portal containing support materials plus Equalities Toolkit by Autumn 2021.
AP07	Provide Commissioner training in Year-1 on Natural Justice & ECHR.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> </ul>	Solicitor	Completed.	
AP08	Increase awareness of cultural importance of Gaelic to customer-base and promote learning by providing training and BnG presentation to Board.	<ul style="list-style-type: none"> <li>• Foster good relations</li> </ul>	Head of Compliance	Gaelic Awareness sessions delivered to all staff from 2018 onwards. As well as delivery of Basic Language Classes, conversation classes have continued throughout 2019/20 until temp halt due to Covid. Now begun again.	Classes recommenced in Nov 2020. 2 x Awareness sessions delivered in 2021/22.
AP09	Ensure all venues for Roadshows are accessible and bi-lingual advertising in Gaelic-speaking areas.	<ul style="list-style-type: none"> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Compliance	Temporarily on hold but all Board meetings now opened up to wider audience and promoted to Assessors.	Gaelic video created in Feb 2021, bilingual signage refreshed in GGH. Roadshows in preparation for autumn/Winter 2021/22.
AP10	Consider Modern Apprentice programme for Corp Admin FTE vacancy	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> </ul>	Head of Operations & Workforce	New opportunities were being considered for 2019/2020. On hold.	Included in Workforce Plan and to be included in independent Workforce Review
AP11	Actions to promote increased awareness of Mental Health in the Workplace	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Compliance	2018 HoC and HoO attended workshops on Mental Health in the Workplace. Work now being undertaken by Staff Engagement Group.	More staff trained as MHFA's. Wellness sessions organised for staff, Wellness conversations taking place with line managers, Boosting resilience session delivered, with new workshop sessions to be designed Autumn/Winter 2021.