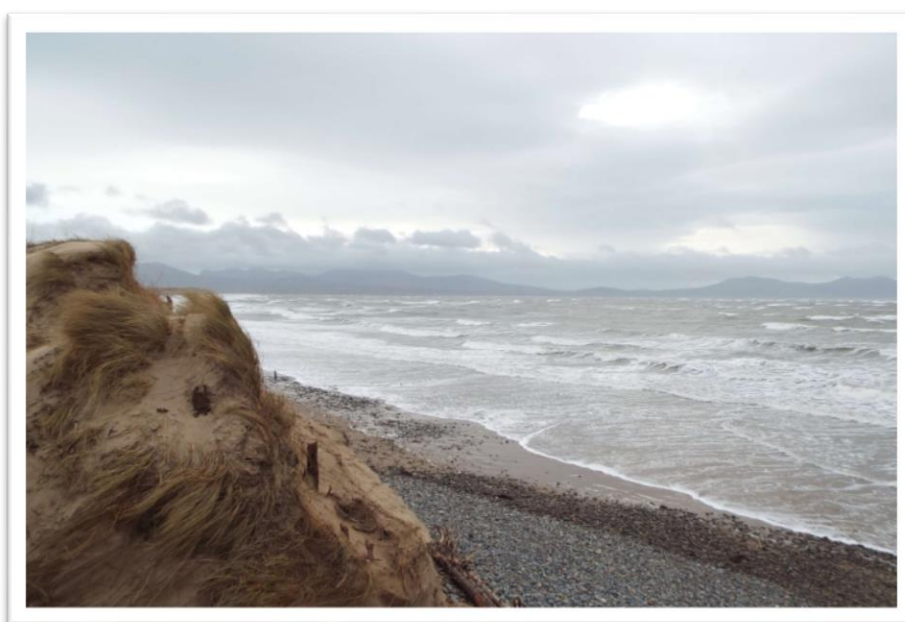


Equality Impact Assessment at Six Key Visitor Destinations



**Phil Chambers Consultancy
In Association with
Equality Gold and EurEauWeb
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Executive Summary

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Introduction

Phil Chambers Consultancy in association with Equality Gold and EurEauWeb was commissioned by Natural Resources Wales (NRW) to carry out an Equality Impact Assessment at six key visitor destinations. NRW is the largest government sponsored body in Wales, with responsibilities for land management, recreation and conservation of the Welsh natural environment. It was established in 2013, largely taking over the former functions of the Countryside Council for Wales, Forestry Commission Wales and the Environment Agency Wales.

The places visited as part of the Equality Impact Assessment were:

Newborough National Nature Reserve and forest, Anglesey

Coed y Brenin Forest Park – Afon Eden Trail and Visitor Centre

Cadair Idris Visitor Centre and Dôl Idris

Garwnant Visitor Centre, Site and Willow Trail

Dyfi-Ynyslas National Nature Reserve

Bwlch Nant yr Arian Forest, Visitor Centre, Site and Barcud Trail

Legislative Context

The Equality Impact Assessment was designed to determine if people recognised as having protected characteristics under the Equality Act (2010) were receiving equal services and opportunities to visit the six evaluation sites. People with protected characteristics include:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex (gender)
- Sexual Orientation

The General Duty (of the Act) requires NRW, through its actions, to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups and foster good relations between people from different groups. This includes employment practices and in the context of this study relates to the goods, services and facilities that it and its sub-contractors provide at outdoor recreation sites.

Methodology

The methodology to carry out the Equality Impact Assessment included a mix of visitor and NRW staff consultations, through online and face to face conversations which were carried out in the early Spring of 2016. A survey methodology was designed to evaluate the suitability of the sites, visitor centres and footpaths described as “all ability” trails to determine their welcome, services and facilities to people with protected characteristics. The six sites were visited individually, to carry out access surveys, although it is fair to say that as it was not the key visitors season, the sites were not as busy as they would probably be later in the year. A policy and strategy review was carried out to identify and assess how NRW included people with protected characteristics in its strategic planning across a range of visitor services.

It was planned to carry out focus group meetings in the vicinity of each of the key sites, which would target opinions from people with protected characteristics, but only one meeting came to fruition, which was held at the NRW building in Bangor and focussed primarily on Newborough National Nature Reserve and forest, Anglesey. The representatives at the focus group included members of the Riding for the Disabled Association and Disabled Ramblers Association. Although efforts were made to stimulate wide consultation, the feedback from Newborough National Nature Reserve and forest was positive particularly in terms of clarifying the need for barrier free environments and the need to increase direct communication between individuals and groups representing people with protected characteristics and NRW. The information and communication services provided by NRW to “people with protected characteristics were also evaluated as part of the Equality Impact Assessment.

Demographics of the Key Destination Sites

The six sites were spread across Wales from the most north westerly, Newborough National Nature Reserve and forest, on the Isle of Anglesey to Garwnant in the south near to Merthyr Tydfil. Dyfi-Ynyslas National Nature Reserve was the most westerly site, although during the survey the Visitor Centre was closed for the winter season. Bwlch Nant yr Arian is a busy visitor destination close to the university town of Aberystwyth, although Ceredigion, where the site is located is sparsely populated. Two sites, Coed y Brenin Forest Park and Cadair Idris and Dôl Idris are situated centrally in mountainous forested areas.

The full spectrum of people identified as having protected characteristics are not fully identified in key research information such as the Census, but where it was possible to collect data, it was interesting to learn that 1,100 people identified themselves as non - white who live on Anglesey, but on average Black and Minority Ethnic (BME) populations in communities in the target visitor destinations were lower than found on average across Wales. More than 59% of the population of Gwynedd said that they were Christian and more than 29% saying they had no religion. On average

20% of people in the target visitor destination areas were described as living with “limiting long term illness” in the last Census.

Although the “protected characteristic” sexual orientation is not identified in the Census results, Lesbian Gay Bi - sexual and Transgender (LGBT) staffing was recorded in NRW’s employee statistics and showed a positive approach to the employment and career provision to people with a sexual orientation “protected characteristic”. Stonewall, the LGBT advocacy group congratulated NRW on its positive approach to equality and diversity employment policies and practices in 2016.

Online Surveys

An online survey was developed to gauge the impact of NRW services and facilities to people within protected characteristics. Although the responses were not numerically high, the feedback was valuable. The online replies were mainly from disabled people and their advocates, although two onsite interviews with people from BME backgrounds were interesting too. It was felt that NRW was successful in meeting the needs of people with protected characteristics although there was a clear demand for increased dialogue and communication between people with protected characteristics and NRW. There was also a strong request for more inclusive information and positive images of people with protected characteristics, amongst the general visitor population, on leaflets and website information. In particular disabled people wanted to work more closely with NRW to develop barrier free outdoor opportunities for all.

A survey questionnaire was sent online to nominated NRW staff, involved in providing facilities and services relating to the six visitor destinations; to learn about their knowledge of NRW equality and diversity policies and to gauge their perception of how effective the policies and practices were in meeting NRW’s responsibilities to visitors under the Equality Act (2010). In the main staff returning the questionnaire felt that NRW had suitable equality and diversity policies in place and that they understood them and they were effectively carried out. Although some staff said that they had received equality and diversity training in the past, there was a clear request for up to date training across the whole spectrum of working with people with protected characteristics.

Access Survey at the Six Key Sites

There was not previously a clearly defined comprehensive survey format for collecting information about accessibility to the visitor destinations for people across the range of protected characteristics, so one was designed to facilitate the data collection.

The survey design used the Countryside for All Standards and Guidelines and the complementary By All Reasonable Means accessibility standards to provide a framework for assessing the physical environment, such as gradients, footpath widths and path quality etc. across a wide range of outdoor settings. Each footpath visited was assessed according to its individual setting and measured to check that the landscape characteristics were within the access standard for that setting. Most of the footpaths surveyed were identified by NRW as “all ability” trails and generally fell with the Countryside for All Rural Standard. The terms “all ability” is a positive, but it is not objective; in that it assumes the abilities of path users rather than assessing and describing the characteristics of the physical environment which will confront them. It is recommended that NRW examines the terminology it uses to describe footpaths and develops a more objective description which provides prospective path users with an informed choice about whether a path meets their individual access needs.

The methodology for assessing the visitor centres and built environment facilities were against the Building Regulations Approved Document Part M and the guidance document BS8300 (2001) Design of Buildings and their Approaches to meet the Needs of Disabled People. A checklist designed by the Disability Rights Commission (now Disability Rights UK) was used as a method of collecting data about the accessibility of buildings. In order to cover the wider needs of people with protected characteristics a checklist was drawn up to identify services and facilities which would benefit more than one group of people across the spectrum of protected characteristics. For example, a reserved quiet room may be equally beneficial to a child on the autistic spectrum, someone requiring a space for prayer or simply someone needing a rest in a peaceful room; or a café servicing food to meet a range of dietary needs might accommodate the needs of people with particular protected characteristics in an inclusive setting. The evaluation of means of communication and information and interpretive services were assessed and good practice; such as effective and inclusive multi-sensory interpretive services at Cadair Idris were identified.

An important caveat which was built into design of the survey methodology and the advice given to NRW was the Principle of Least Restrictive Access (PLRA). The PLRA is implicit within the Equality Act, which recognised that service providers such as NRW should make “reasonable adjustments” to meet the access needs of people with protected characteristics. In terms of access to the outdoors, the PLRA recognises that it is not necessary for all footpaths to be accessible to all disabled people, but some should be and NRW is reaching that requirement by providing what it describes as “all ability” trails, which were generally compliant with the Countryside for All Rural Standard. The Disabled Ramblers who were consulted during the survey asked NRW to extend opportunities, by applying the PLRA, for outdoor scooter users to access more challenging places, by introducing barrier free routes; which are generally paths without stiles, fences and walls.

During the survey process a great deal of access information was collected across the six survey visitor destinations, on the outdoor and built environment, information and way-marking provision and interpretive services. Full batteries of recommendations were provided for each individual site and barriers to access were identified by photographs, to assist NRW staff to make access improvements.

During the site surveys, some NRW staff accompanied the survey team, which was mutually beneficial. It is recommended that NRW staff are properly trained in access auditing skills to build upon and advance the groundwork carried out as part of the Equality Impact Assessment evaluation.

Equality Impact Assessment Findings

There is no doubt that NRW is meeting its obligations to people with protected characteristics in the services and facilities that it is providing at the six key visitor destinations sites visited. The commitment of NRW to working more closely with all current and prospective user groups was clear and NRW staff were very positive about building on the good practice and dialogue achieved as part of the inclusive access focus group meeting about Newborough National Nature Reserve and forest.

There have been some exemplary projects in the past, such as MOSIAC which encouraged BEM people to visit the Snowdonia National Park and Brecon Beacons National Park and that level of good practice is a model for NRW to emulate in the future. It was felt that NRW is more effective in promoting its facilities and services more effectively to some “protected characteristic” people than it is to others. Young people, children and young adults were often featured in promotional material and at Bwlch Nant yr Arian Forest, women with young children were portrayed visiting the site and enjoying the great outdoors. By contrast a young man from a BEM heritage said that he would like to see more inclusive positive images of BEM visitors in promotional material; both to celebrate NRW’s commitment to inclusive practices and also to raise the awareness of people who may not be visiting the six visitor destinations that the opportunity is there for them to enjoy too.

It is very important for NRW to receive recognition of its very good employment practices in terms of LGBT staff and there is now an opportunity for the organisation to mirror those accomplishments in the provision of goods and service in outdoor environments. Organisations such as Unique Transgender North Wales and Cheshire, which meets in Llandudno, should be contacted to develop links with people with sexual orientation protected characteristics. Ceredigion Voices for Equality is also an emerging group facilitated by the Council which might also be targeted by NRW to promote its excellent sites and facilities.

In summary it was found that NRW is very committed to building inclusive opportunities for people with protected characteristics and that staff are anxious to

receive additional equality and diversity training and support to enable them to be even more effective in accomplishing that objective.

It was found that NRW has a good policy and strategy framework to achieve more inclusive environments and that the Strategic Equality Plan 2015 – 2019 is very pertinent in its aims and objectives which states “We recognise that people have different needs, cultures, experiences and expectations, and by responding to these, we all benefit from an enriched experience of life and a broader outlook to deliver excellence for all our customers and meet our long-term goals”.

Strategic Recommendations

Although individual recommendations were provided at each of the six targeted visitor destination sites to assist in meeting the needs of people with protected characteristics; the following strategic recommendations are also made to NRW

Policy and Strategy

Although a number of policy and strategy documents were reviewed during the Equality Impact Assessment study, it is the Strategic Equality Plan 2015 - 2019, which should provide the benchmark for NRW to meet its responsibilities to people with protected characteristics. This is an overarching document which should impact on all other strategic plans. The Strategic Equality Plan does not have an associated framework of SMART objectives yet, so to some extent it remains an aspirational policy. The findings and recommendations set out in this report should be integrated into the Strategic Equality Plan to better consider the needs of visitors with protected characteristics to receive equality of opportunity in accessing NRW services and facilities. A clear line of communication should be established, so that all members of staff, volunteers and partner organisations understand how their jobs impact on the success of meeting equality objectives, so that they feel engaged in the processes involved in providing inclusive services and facilities to people with protected characteristics.

Monitoring Services

During the survey it was found that NRW does not presently set out Key Performance Indicators (KPI's) to ensure that its equality and diversity policies cascade down through the organisation and are monitored as regards the objectives related to people with protected characteristics. It is essential for all NRW staff, volunteers and partners to receive the leadership and guidance to enable the organisation to effectively monitor and where necessary modify its practices to provide a benchmark for meeting its responsibilities under the Equality Act (2010). The establishment of KPI's and regular reviews throughout all levels of the organisation is necessary to achieve this goal.

Consultation and Engagement

The Strategic Equality Plan clearly sets out NRW's commitment to working in partnership with people with protected characteristics and the study has shown that NRW is meeting that goal in terms of employment practices, as evidenced by its improvement in the Stonewall equality index. However, there is not sufficient evidence to show that this standard is being replicated within visitor services and few tangible examples were found, particularly at "grass roots" level. There were examples of people with protected characteristics reporting good service at all of the sites visited during the survey, but not a universal perception of NRW working closely with people with protected characteristics to find out their need and wants and where practical working in consultation with them to meet their aspirations. It is imperative that NRW consults more effectively with people with protected characteristics to ensure they are not disadvantaged in their chances to equally participate in NRW services. It is recommended that local Equality and Diversity forums are established to complement LAF's at grass root levels and that these are resourced to support the inclusion of people with protected characteristics.

Marketing and Communication

There is a need for NRW to engage more effectively with people with protected characteristics and to develop a marketing and communication strategy which is targeted to all protected characteristics people. At the moment the emphasis appears to be towards families and active young people. People from BME backgrounds suggested providing positive images of people participating in activities in an integrated setting. A range of media platforms should be utilised, the NRW website is a key opportunity to present positive illustrations and images of inclusive services. There is a clear opportunity for NRW to target information to advocacy umbrella organisations such as Unique Transgender, U3A and emerging groups like Ceredigion Voices for Equality and to search out more local organisation with whom to engage and consult about equality and diversity matters and planning.

The line of communication with people with protected characteristics was not clear and appeared to be an ad-hoc approach of website information and promotional leaflets, which were mainly of a generic nature, with a focus towards active families and young people. There does not appear to be marketing targeted at "protected characteristic" people.

The NRW website has a page dedicated to Planning your Visit for each of the six sites within the Equality Impact Assessment study, but unfortunately these are in a text format, without any graphics or illustrations showing disabled people having a great time in an integrated and inclusive outdoor setting.

The international standard for website accessibility and usability is the World Wide Web Consortium www.w3c.org and it is recommended that, if it has not done so,

NRW should ensure that it complies with W3C standards. Although not ratified by the relevant governments as yet, on the 3rd May 2016, the European Council and the European Commission agreed that all public sector websites should be made more accessible and governments will be expected to ensure that within twenty one months of ratification, to include the following requirements in legislation:-

- New public sector websites and apps will have to be accessible. Current websites will have to be updated.
- Older content will need to be made available, in accessible format, on demand.
- Closed captioning or another accessible alternative will need to be provided on government videos. In the case of live streaming the videos need to be made accessible within 14 days of broadcast.
- There will need to be a clear statement outlining the parts of public sector websites that are not accessible.

Some of the issues relating to the need for captioning on videos provided on the NRW website will need to be addressed and it is recommended that NRW examines the planned legislation in the context of its “anticipatory” requirement under the Equality Act (2010).

Physical Access Improvements

NRW should ensure that physical access improvements provide safe and easy to navigate paths which meet the needs of a range of people with protected characteristics. The access Standards should provide the guidance for informing visitors about the character of the landscape and where paths are steeper than the Standard, visitors should be advised. Good paths and easy to access seating and other facilities and complementary information and signage should be interlinked. NRW should review its direct linkages between paths that meet both the needs of disabled people and families with children’s buggies. The Principle of Least Restrictive Access (See **Section 8 Site Survey Methodology**) should be applied where the Standard cannot be met or NRW might explore developing By All Reasonable means promotion in some of its promotional material, to identify wilder routes with barrier free access. NRW is presently making good progress in consulting with the Disabled Ramblers in and around Anglesey and discussions have developed to provide barrier free routes for people using outdoor mobility scooters and Riding for the Disabled have successfully been engaged in discussing opportunities for horse-riding and carriage driving. NRW should provide the necessary resources to ensure that footpaths across the network are adequate to maintain current capabilities and to meet its responsibilities within the “anticipatory” requirements of the Act and the diverse needs of people with protected characteristics.

Information Services

NRW should review its information services and ensure that people with a diverse range of protected characteristics are represented equitably on promotional material. This should be provided through a clear strategy that encompasses print and electronic formats; across a mix of digital platforms. NRW should provide a clear and consistent message regarding footpath design and provide objective information throughout. Assistive technology should be provided to support people with protected characteristics, with sub titles being provided on all future audio visual media and audio induction loops offered in key places. Audio description should be provided as part of an inclusive information plan. NRW should develop an inclusive information design manual which can be universally adopted across the organisation. Strategic staff should be trained in providing inclusive information services and all staff should receive guidance in inclusive information and communication, as part of a generic Equality and Diversity development programme.

Linkages

NRW should develop a holistic development plan for NRW sites with an assurance that key recreational and leisure opportunities link together. There was some concern during the survey work that the legacy of the Mosaic project, involving the Snowdonia and Brecon Beacons National Parks may be losing influence; it is important for NRW to communicate and engage with the Community Champions network and to replicate that exemplar service to more “protected characteristic” people. The linkage between the local communities, particularly with people with protected characteristics needs to be strengthened. Although, NRW sites are often in rural and sometimes isolated places, it is necessary to build and extend links with people with protected characteristics through establishing grass roots consultative access forums. The role of local stakeholders is essential in establishing and organising this process. There is an opportunity for NRW to work more closely with peer group organisations to disseminate good practice in working to provide inclusive environments and to take a lead in providing guidance, policies and practices which can form a template for universal design, which should be achieved in partnership with peers group organisations and representatives and advocates of people with protected characteristics.

Equality and Diversity Training

One of the most important things that NRW can do to build its own skills and knowledge and to gain the confidence of people with protected characteristics is to provide all staff with equality and diversity awareness training. This should be provided to recreational staff, visitor services team, marketing and education teams and should include volunteers, and associate organisations’ staff and volunteers. Equality and diversity training should provide both general guidance about the Act and the General Duty and NRW’s responsibilities including those of individuals. It should also include specific targeted training such as inclusive design, access

auditing and consultation and engagement with protected characteristics. People with protected characteristics should be consulted on the design of the training modules and need to be directly involved in the delivery of the training programme.

