



***Office of the Immigration Services  
Commissioner***

**Diversity and Inclusion  
Scheme  
2018 - 2022**

**OISC  
5<sup>th</sup> Floor  
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## Foreword

Welcome to the OISC's Diversity and Inclusion Scheme.

This Scheme builds on the OISC Equality Scheme that has run since 2011 and has been produced following wide ranging external consultation.

This Scheme describes how the OISC will meet its obligation to put Diversity and Inclusion at the heart of our business. The Scheme is for period 15 May 2018 to 14 May 2022.

The OISC views equality Diversity and Inclusion as something that affects us all regardless of background, and we are committed to working closely with everyone who is affected by, or interested in, our commitment to this. We see this as an ongoing process.

In developing our Scheme we proactively consulted with external bodies. The consultation document was sent to 39 equality organisations, of which two are OISC stakeholders (The list of organisations consulted is at Annex 1 and the questionnaire they were invited to complete is at Annex 2).

Regrettably, in the absence of any responses, the OISC has developed its Action Plan rolling forward the issues identified in the previous Consultation, supplemented by additional initiatives subsequently undertaken which assist the progression of Diversity and Inclusion.

For those of you that have helped us so far with this project, thank you for your input and assistance. For those of you we have not yet encountered, we trust that the objectives of our scheme will help us meet your expectations if, and when, we encounter you in the future.

**Dr Ian Leigh**  
**Deputy Immigration Services Commissioner**

## The role of the Office of the Immigration Services Commissioner (OISC)

The OISC is an executive non-departmental public body established by the Immigration and Asylum Act 1999 to regulate the provision of immigration advice and services throughout the UK. It is led by the Immigration Services Commissioner – a corporation sole – supported by the Deputy Commissioner.

The OISC seeks to protect consumers by ensuring the continuing fitness and competence of registered advisers and organisations, setting standards for registration and promoting good practice throughout the sector. In addition, it operates a scheme to receive complaints relating to immigration advice (whether or not provided by registered organisations) and it enforces the regulatory regime by identifying and, where appropriate, prosecuting individuals who are acting illegally.

In addition, the Immigration Services Commissioner monitors the effectiveness of regulation of the immigration advice sector by bodies in Scotland and Northern Ireland which are beyond the jurisdiction of the Legal Services Board.

The Office is located on the fifth floor of 21 Bloomsbury Street – a building on the government estate shared with a range of other public sector bodies who are principally affiliated to the Department for Digital, Culture, Media and Sport. The OISC currently employs some 58 staff (in addition to the two Commissioners) and its 2018/19 budget is £3.82 million. As of 1 April 2018, 3,337 advisers and 1,567 organisations were directly regulated by the OISC.

## The Equality Duty

### The general equality duty

The general equality duty requires public authorities to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation;
- Advance equality of opportunity between people who share a characteristic and those who do not; and
- Foster good relations between people who share a characteristic and those who do not.

This is very similar to the previous 'general duties' for race, disability and gender equality. It entails giving appropriate weight and priority to the need to:

- Remove or minimise disadvantages;
- Take steps to meet the needs of people with protected characteristics; and
- Encourage people with protected characteristics to participate in public life.

Public authorities are also encouraged to take steps to take account of people's disabilities (for example, by making reasonable adjustments). Fostering good relations includes looking at how to tackle prejudice and promote understanding.

Compliance with the general equality duty means that in some circumstances it is lawful to treat some people more favourably than others, when this is allowed by the Equality Act 2010.

### Specific duties

The specific duties require public bodies to set specific, measurable equality objectives and to publish information about their performance on equality so that the public can hold them to account. All information must be published in a way which makes it easy for people to access it.

### Protected characteristics

The protected characteristics under the Equality Act 2010 are:

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

## General Equality Duty – what the OISC currently has in place

Although the action plan contained within this document outlines what additional things we intend to put in place to comply with the general Equality Duty, the OISC already does many things which meet the general duty as listed below.

### Non-statutory initiatives

- Electronic application forms have been introduced;
- The OISC's Website content complied with Web Content Accessibility Guidelines (prior to technical problems temporarily closing full access);
- Leaflets/publications are available in Braille on special request;
- A Guaranteed Interview Scheme is provided at recruitment stage for applicants with disabilities who meet essential criteria;
- An Equality & Diversity questionnaire is issued to all new staff joining the OISC;
- Induction training is provided which includes explaining to new staff the OISC Equality & Diversity policy;
- The OISC's HR policies include Equality & Diversity and Dignity at Work;
- An Equality Impact Assessments carried out on all new/amended HR policies;
- The OISC engages and Occupational Health Provider, their services include providing advice on disability related illnesses and adjustments required;
- Workstation assessments are carried out and adjustments made/items purchased, where applicable;
- A counselling service is available in certain cases;
- Workstations are accessible for wheelchair users;
- Flexible working policies are in place;
- Special leave is available with pay for employees with HIV, cancer and other long-term medical conditions;
- Wheelchair access is available via a lift to the OISC's offices on the 5<sup>th</sup> floor with ramp access from lift to door;
- Intercom designed for use by wheelchair users is available to gain access to the building;
- Disabled toilets are available;
- The OISC's premises are on one floor, with no stairs to negotiate;
- Special evacuation procedures are in place for the physically disabled;
- OISC fully Trained First Aiders are in place with knowledge of staff with certain disabilities e.g. epilepsy; and
- Floor Wardens are trained in search/evacuation procedures including the special needs of disabled persons.

In addition, the OISC aims to comply fully with health and safety and employment law requirements.

## Consultation

### **Our approach to the development of this Scheme**

This Scheme continues to use the criteria that were developed in partnership with external stakeholders and OISC staff.

When developing this scheme we wanted to hear about:

- Ease of access to OISC services;
- Ease of access to the OISC's office by telephone; and
- Improvements we could make in service provision;

## Developing our action plan for 2018 – 2022

### **Equality Analysis**

Equality Analysis is a valuable tool in helping organisations to look at their policies and practices to make sure they do not discriminate or disadvantage people. They are not an end in themselves but are a way of ensuring that due regard has been paid to the general duties. They also help to promote equality. Equality Analysis helps the OISC to measure whether it is meeting its obligations under the general duties.

### **Updating the Equality Scheme – Now called the Diversity and Inclusion Scheme**

We will review the Scheme after one year of operation in 2019 to determine how it's working and if changes are needed. Thereafter we will review it every three years.

As part of this we will be monitoring progress, and, if we identify any changes that need to be made prior to the review period, these will be implemented.

As a small non-departmental public body (NDPB) employing fewer than 60 staff and with an annual budget of just under £4 million, there are constraints we face both in terms of time and resources; we therefore have to be proportionate about what we can do in achieving our objectives within this Scheme.

## Contact information

Comments on this Scheme are welcome; please contact us as follows:

Head of Human Resources & Corporate Support  
OISC  
5<sup>th</sup> Floor  
21 Bloomsbury Street  
London  
WC1B 3HF

Tel: 020 211 1500  
Fax: 020 7211 1532  
e-mail: [info@oisc.gov.uk](mailto:info@oisc.gov.uk)



## OISC Equality and Diversity Policy Statement

The OISC is committed to equality of opportunity in the selection, employment and development of its staff, in the provision of a work environment free from discrimination and the way in which we deal with our external stakeholders. Our aim is for all staff to put into practice the principles of equality and diversity and to be aware of the part they play.

We will not tolerate discrimination in any form, including against anyone possessing a protected characteristic as defined by the Equality Act 2010. The characteristics are:

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

We will not discriminate because of flexible working arrangements that may be in place or because of membership of a trade union and will not tolerate harassment or bullying on these or any other grounds.

We are fully committed to the duties placed upon us as a public body under the Equality Act 2010 and other forms of legislation that combat discrimination and promote equality and diversity. We will ensure that everyone in the OISC is respected and can give their best, irrespective of who they are or what job they do. We will work hard to ensure that our services are accessible to the diverse customers we serve

The OISC has other policies which reflect the type of work environment we want to see. In particular, issues relating to bullying and harassment can be found in the OISC's Dignity at Work Policy which is available to staff on the OISC Intranet

## Action plan for implementing OISC Diversity and Inclusion Scheme

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
<b>Equality Analysis</b>	Carrying out Equality Analysis	<ul style="list-style-type: none"> <li>All new business proposals, consultation documents, project plans, business and corporate plans/strategy to be Equality assessed during their development alongside Regulatory Impact Assessments and environmental Impact Assessments when appropriate</li> <li>Equality Analysis will be carried out at the renewal stage of existing policies. This is normally on a three year programme but may be sooner e.g. changes in the law</li> <li>All OISC policies with dates for review are listed on a schedule that is reviewed regularly by the Senior Management Team (SMT)</li> </ul>	Ongoing	Authors of the policy, document etc.
			As and when	Authors of the policy, document etc.
			Ongoing	Authors of the policy
<b>Progress Reporting</b>	Annual report to Senior Management Team (SMT) on action plan progress	<ul style="list-style-type: none"> <li>Include in SMT schedule as part of HR Corporate data set reporting</li> </ul>	April 2019	Head of HR
	Annually publish action plan progress on OISC website	<ul style="list-style-type: none"> <li>Place annual update on OISC website each year</li> </ul>	May 2019	Head of HR

<b>Area of Implementation</b>	<b>Element</b>	<b>Performance Indicator</b>	<b>Milestone</b>	<b>Responsibility</b>
	Review of Scheme	<ul style="list-style-type: none"> <li>• Initial Review after first year</li> <li>• Triennial review thereafter</li> </ul>	April 2022	Head of HR
<b>Communication</b>	Publication of Scheme  Dissemination to key stakeholders	<ul style="list-style-type: none"> <li>• Scheme published after following SMT approval</li> <li>• Scheme to be made available in accessible formats on request</li> <li>• Scheme to be published on website</li> <li>• Copy of Scheme to be made available to all staff via Intranet link</li> <li>• Copy of Scheme mailed to all those consulted on the Scheme who requested a copy, and to others on request</li> <li>• Article in OISC Newsletter informing of the publication of the Diversity and Inclusion Scheme</li> </ul>	15 May 2018  December 2018 onwards  15 May 2018 15 May 2018  15 May 2018  Summer newsletter	Head of HR  Head of HR  Head of HR Head of HR  Head of HR
<b>Complaints</b>	Complaints procedure	<ul style="list-style-type: none"> <li>• To respond to any complaints in accordance with the published timescales in the OISC internal Complaints Procedure</li> <li>• To provide SMT with details of complaints made relating to disability and action taken as per existing reporting system</li> </ul>	Ongoing  Bi-annually	Head of HR  Head of HR

**Equality Impact Assessment (EIA)**  
Policies; Projects and/or Organisational/Service changes

OFFICE OF THE  
IMMIGRATION SERVICES  
COMMISSIONER



1	<b>Name of the Policy; Project and/or Organisational/Service change</b>	
2	<b>OISC Team</b>	
3	<b>Details of the person responsible for the EIA</b>	Name: Team: Contact details:
4	<b>What are the main aims and objectives of the Policy; Project and/or Organisational/Service change</b>	

5	<p align="center"><b>A) IMPACT</b></p> <p><b>Is the policy/service likely to have a <u>differential</u> impact on any of the protected characteristics? If so, is this impact likely to be positive or negative?</b></p> <p>Consider:</p> <ul style="list-style-type: none"> <li>• Does the policy/project apply to all or does it exclude individuals with a particular protected characteristic e.g. females, older people etc?</li> <li>• What does existing evidence show? E.g. consultation from different groups, demographic data, questionnaires, equality monitoring data, analysis of complaints. Are individuals from one particular group accessing the policy/project/services more/less than expected?</li> </ul>	<p align="center"><b>B) MITIGATION</b></p> <p><b>Can any potential negative impact be justified? If not, how will you mitigate any negative impacts?</b></p> <ul style="list-style-type: none"> <li>✓ Think about reasonable adjustment and/or positive action</li> <li>✓ Consider how you would measure and monitor the impact going forward e.g. equality monitoring data, analysis of complaints.</li> <li>✓ Assign a responsible lead.</li> <li>✓ Designate a timescale to monitor the impacts.</li> <li>✓ Re-visit after the designated time period to check for improvement.</li> </ul>
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**Equality Impact Assessment (EIA)**  
**Policies; Projects and/or Organisational/Service changes**

**Lead**

<b>Age</b>	Needs to be accessible to all regardless of age		
<b>Disability</b>	Needs to be accessible to all regardless of ability or disability		
<b>Race</b>	Needs to be accessible to all regardless or race		
<b>Gender Reassignment</b>	Needs to be accessible to all		
<b>Marriage and Civil Partnership</b>	Wording needs to apply to people of all sexual orientations. E.g. not just the use of 'husband' and 'wife' etc.		
<b>Pregnancy and maternity</b>	Needs to be accessible to all		
<b>Religion and Belief</b>	Needs to be accessible to all, regardless of Religion or Belief		
<b>Sex</b>	Needs to be accessible to both men and women		
<b>Sexual Orientation</b>	Wording needs to apply to people of all sexual orientations. E.g. not just the use of 'husband' and 'wife' etc.		

<b>General Comments across all equality strands</b>	
<b>EIA Sign-Off</b>	Your completed EIA should be sent to the HR and Corporate Support Manager  ✂ <i>details redacted</i> ✂

## Annex 1: List of organisations consulted

OISC Equality Stakeholder Consultation Groups

List of key OISC Adviser stakeholder organisations invited to respond to consultation:

ARIA  
ILPA

List of other OISC Adviser organisations invited to respond to consultation:

RLC  
IAS  
DisabledGo  
(Recommended for inclusion by ARIA during Disability Equality Scheme consultation)  
Discrimination Law Association  
(Recommended for inclusion by ILPA)

List of Equality Groups included invited to respond to consultation (issued on 22 January 2018):

United Kingdom Disabled People's Council  
Mind  
Action on Hearing Loss  
RNIB (Royal National Institute for the Blind)  
Muslim Council of Britain  
Disability Rights UK  
Discrimination Law UK  
Diabetes UK Helpline  
Terrence Higgins Trust  
Macmillan Cancer  
Mencap  
Stonewall  
Disabled Go  
Equality and Diversity Forum  
The Multiple Sclerosis Society  
Interfaith Network  
Equality Network  
Black Training and Enterprise Group  
British Dyslexia Society  
Voice4Change  
Race on the Agenda  
League of British Muslims  
Churches Together  
Business in the Community  
UK Lesbian and Gay Immigration Group  
Joint Council of the Welfare of Immigrants  
Dalit Freedom Network

*Seap Advocacy*  
*Stop the Traffic*  
*Epilepsy UK*  
*Stroke Association*  
*The Camden Society*  
*Rights of Women*  
*Freedom from Torture Scotland*  
*Bail for Immigration Detainees*  
*Immigration Law Practitioners Association*  
*Refugee Action*

## Annex 2: Equality questionnaire

### Ease of access to OISC services

Q 1. The three questions in this section are about ease of access to OISC information and help/assistance given by OISC staff. You may have accessed our services already, in which case we would like to know about your experience and what improvements we might make. Alternatively, if you have not yet accessed these services, we would like to know what you consider would be a positive experience if you did.

- a) Ease of access to information on the OISC website:

Your Comments:

- b) Ease of accessing the OISC by telephone

Your Comments:

- c) Given your individual needs, did our staff fully assist you?

Your Comments:

### Ease of access to the OISC's office

Q 2. When visiting us at our premises at 21 Bloomsbury Street in London WC1B 3HF, how did you find the following?

- a) Ease of access to the building

Your Comments:

- b) Once inside our 5th floor office, did you find the environment generally user friendly? If not, please tell us which aspects could be improved.

Your Comments:



## Improvements in service provision

Q.3 We would like your comments on how you think we can improve the service we provide to people with protected characteristics?

Your Comments:

## General

Q.4 Please use the space below for any additional comments you may wish to make. In particular, is there anything you would like to tell us which is not covered by the questions above?

Your Comments:

Thank you for taking time to give us your views. Your input is vital to ensuring that the OISC Single Equality Scheme reflects the needs of its stakeholders.

Please tell us if you would like to be involved in the design and delivery of our services for those with protected characteristics. If so, please provide us with your contact details below.

Contact details:

If you would like a copy of the published OISC Equality Scheme to be sent to you, please tick this box [ ].