CAA Equality & Diversity

Information Report, January 2012

Introduction

For a number of years, the CAA has published an annual report in respect of Equality and Diversity in the employment sphere, setting out current Equality information, progress made in the previous 12 months and objectives for the forthcoming year. The enactment of the Equality Act 2010 and the Public Sector Equality Duty has given us an opportunity to review the information we publish, how we present it and, more importantly, how we can use it to make a difference.

The Equality Act 2010 (Specific Duties) Regulations 2011 require public bodies to consider all individuals when carrying out their day to day work – in shaping policy, in delivering services and in relation to their own employees. The Public Sector Equality Duty (s149 of the Equality Act 2010) applies to public bodies such as the CAA that carry out public functions. The Duty has an significant impact on the CAA particularly because we have not previously carried out work in this area in respect of our function as an industry regulator or licensing authority.

This is our first Information Report following the introduction of the Equality Duty. We will review the information contained within this report and publish an updated report after 12 months.

In publishing this report and in subsequent reports, our aims reflect the three aims of the Equality Duty, which are to:

- Eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it and
- Foster good relations between people who share a protected characteristic and people who do not share it

The Equality Duty is supported by specific duties which require us to publish relevant, proportionate information demonstrating our compliance with the Equality Duty and to set ourselves specific, measurable equality objectives.

In compiling this report, we have consulted information and guidance from the Equality and Human Rights Commission (EHRC), the Government Equalities Office and a number of advisory bodies.

Why we are publishing this information

Producing, publishing and analysing organisational information on Equality and Diversity has a number of benefits for the CAA, our employees and our external stakeholders and service users.

In addition to demonstrating our compliance with the Equality Duty, we are publishing this information in order to:

- Help us make faster progress by improving transparency and giving all our stakeholders a better opportunity to contribute ideas, challenge us and share good practice with us. The information in the reports is meant to provide the necessary background information to enable stakeholders to make an informed contribution and to tell us what they think our priorities should be.
- Demonstrate that we are accountable to our stakeholders, not only in the way we regulate the UK aviation industry but in how we operate generally and how we make decisions that may affect our spending of stakeholder money.

The information we already have available, and any further useful information that we can produce in the future, will help inform our Equality and Diversity Objectives. However, our aim is not to produce information for the sake of it, but to focus on the information which will underpin and evidence our efforts to make a real difference.

CAA Diversity Statement

The CAA recognises that each individual is different, and it values that difference. All individuals, working within or engaging with the aviation sector, deserve to be treated with dignity and respect. This way of working benefits all of us. The CAA will seek to ensure that people can expect to be treated in this way both by the CAA and by others in the sector, regardless of gender, marital status, ethnic background, age, sexuality, disability, religion or belief, pregnancy or maternity.

Each CAA employee is responsible for making sure that the CAA's good reputation as an employer, a regulator and a licensing authority is maintained, and that unfair discrimination or harassment in any form does not happen. If it does, then it is investigated and appropriate action is taken.

In respect of recruitment, career progression and development, the CAA ensures that no requirement or condition is imposed without justification, which could disadvantage an individual on any of the above grounds. We make efforts to identify and remove unnecessary or unjustifiable barriers and provide appropriate facilities and employment conditions to meet the needs of any underrepresented groups.

Accountabilities

CAA Board members have overall responsibility for ensuring and promoting diversity at the CAA and for building the skills required to deliver the Equality Duty. They are committed to

equality of opportunity and the ongoing development of diversity. Certain board members have specific accountabilities in respect of equality and diversity and one is appointed as a designated equality and diversity "Champion". Progress towards improvement actions are reviewed as part of the CAA's normal business planning cycle.

All managers are responsible for ensuring that the CAA's values and commitment to diversity are clearly communicated and that any supporting initiatives are put into effective operation. Managers are required to:

- Demonstrate and promote considerate and fair behaviour and contribute to the advancement of diversity in the CAA.
- Promote a supportive working environment.
- Ensure that any unacceptable behaviour is addressed.
- Plan and implement action to deliver the Equality Duty

All employees are responsible for ensuring that the aims and values in the CAA's Equality and Diversity policy are supported at a working level. Also, that they treat everyone with respect and without prejudice and engender positive behaviours through their working relationships.

The CAA has robust procedures in place to deal with any case where a person feels they have been discriminated against or treated in a way that is inconsistent with our Equality and Diversity policy.

Our values

Our organisational values are of key relevance to our work on Equality and Diversity, and the two are intended to underpin each other.

Our values and the behaviours we expect in relation to Equality and Diversity are set out in Annex A.

Our policies

The CAA's current policies on Equality and Diversity and Harassment are attached at Annexes B and C respectively.

Our previous Equality and Diversity Reports, including the annual objectives we set ourselves, are available on request.

Our approach as a regulator and licensing authority in the area of Equality and Diversity, is not yet defined. We intend to involve stakeholders and employees in defining and communicating it, and in then taking appropriate steps to make positive change, as we believe that this will maximise the difference we can make.

Our workforce profile

We currently monitor job applicant and employee profiles in respect of gender, ethnicity, disability and age. Annex D gives a breakdown of our current workforce by gender, ethnicity, disability and age group. It also shows our turnover and sick absence levels, by gender and ethnicity.

On the basis of the data from the workforce profile as at 30 November 2011, the following key points are evident:

Gender

We know from our licensing records that only 4.3% of flight crew and aircraft maintenance engineer licences are currently held by females, and many other sectors of the aviation industry can also be seen as male-dominated to a greater or lesser extent. Raising female representation in our workforce is therefore a significant challenge, and must be seen as part of a wider question of equality of opportunity within the sector as a whole.

Females represent 42% of our workforce. This has risen by only 1 percentage point since April 2007. Additionally, in the areas where we employ the most aviation specialists and related technical experts, such as Flight Operations, the representation of women is much lower, at around 27%. 87% of our employees on personal contracts or in grades 1 to 3, i.e. our most senior colleagues, are male.

Ethnicity

Annex D compares our white and ethnic minority workforce profiles. Because of the current low number of ethnic minority employees, we have not distinguished between the different ethnic minority groups. Key points are:

- 6.2% of our current workforce is ethnic minority i.e. not White British. This has increased from 4.5% in April 2007 but remains low compared to 10% non-white in the UK population and 8% in the South East, where the majority of our colleagues are located.
- 8.3% of London-based CAA employees are ethnic minority, compared to 35% in London generally.
- 3.8% of our senior graded colleagues (Grades 1 to 3 and personal contracts) are ethnic minority.

Disability

Our current monitoring system relies upon the information voluntarily provided to us by job applicants at the recruitment stage. Whilst this gives an indication of our disability profile, of course it does not take into account any disability that arises after recruitment, unless the individual chooses to inform us. As many of our colleagues were recruited before the definition of disability was amended in the Disability Discrimination Act 1996 and subsequently in the Equality Act 2010, the applicability of currently held data is unreliable. Notwithstanding these points, only 0.92% of current CAA employees told us they had a disability when they joined. This has decreased from 1.1% in April 2007.

Age

Our current workforce is older than the UK average. Our traditional staffing model has relied on our being an attractive natural career progression for aviation professionals, who might join us for the later part of their career. Our current data shows that:

- 64% in CAA are aged 45 and over, compared to 42% in the UK overall
- 38% of CAA employees are aged 45-54, compared to only 14% in the UK generally
- The average age of CAA employees is 47, having risen from 46 since 2007, and is higher than the national average. It may increase further in the wake of the removal of the retirement age, an ageing workforce and low turnover.

Religion and Belief

The CAA for the moment has chosen not to monitor religion and belief amongst its employees or prospective employees. This approach was fully discussed and agreed with employee representatives. However, we continue to ensure that employment policies and practices take full cognisance of the need to promote diversity in this area and include it in our mandatory diversity training awareness programmes for employees and managers. As with all other aspects of diversity in the CAA, we periodically review this position.

We developed some case studies on this topic, that were derived from actual cases but tailored for our organisation, and included them in a new mandatory Diversity training module for all managers. The cases are deliberately subtle and the outcomes not easily predictable. We feel that this inter-active approach raises awareness of difficult issues better than simply showing sets of slides. We continue to learn on this subject by accessing relevant learning events and information sources. Sexual Orientation

Following consultation with Trade Union and employee representatives, the CAA has chosen for the moment not to ask job applicants or employees to declare their sexual orientation, and we do not monitor our recruitment or workforce profile in this respect. However, we continue to ensure that all areas of employment policies and practices take full cognisance of the need to promote diversity in this area of potential discrimination. We also include it in our mandatory diversity training awareness programmes for employees and managers.

As with all other aspects of diversity in the CAA, we periodically review our position and seek guidance from authoritative bodies.

Recruitment

Annex E gives a breakdown of our job applicant and recruitment profile over the past 12 months.

Females and ethnic minorities are currently under-represented in managerial / technical roles in the industry. The CAA has to some extent reflected the UK aviation industry in the key areas from which we recruit (see Annex F, which shows the gender balance in licence holders). Additionally, the numbers of women in engineering disciplines is low across the UK (including in Aircraft and Air Traffic engineering).

We work closely with our external recruitment partners to maintain and improve our monitoring of the profile of new joiners. The long term trend is towards a more diverse workforce, particularly in respect of gender and ethnicity. People with disabilities continue to be under-represented in our applicant profile and indeed in our workforce (but see above). We employ a wide range of professions, accessing an equally wide range of labour markets. The diversity profile therefore differs greatly according to the individual position being filled.

Equal Pay

In 2005, we conducted a review of pay equality across the organisation, in partnership with our recognised Trades Unions. No significant gender pay gaps were identified, although there was a pattern of men being in generally higher graded positions and therefore on higher average pay overall.

Our pay and grading systems at that time had evolved within the different CAA organisational groups, each of which had a legacy of autonomy in this area. Although this had arguably allowed greater local freedom to reflect market and local organisational factors, the CAA had since developed into a more unified and integrated entity and so the separate systems were not conducive to transparent comparison across the CAA as a whole. They were a barrier to comparison and challenge, both for the CAA and its employees.

In 2006, following consultation with employees, we implemented a single pay and grading structure for the whole of the organisation. We carried out a full job evaluation exercise, using the Hay system, and migrated all roles onto the new structure. Any employees who did not agree with the outcome of their job's evaluation were given the opportunity to appeal. One grading structure now applies to the entire organisation and allows much easier comparison between roles and pay.

Equality-related employee grievances

Our Grievance Policy states that "A grievance is an employee's expression of concern or dissatisfaction on a matter connected with their work, working relationships or working environment. It is for the employee to determine when they perceive a grievance and to provide detailed evidence of their grievance."

Since 2007 we have monitored and tracked all employee casework and grievances that are raised. Cases handled formally to date are summarised below.

Calendar Year	No. of cases	Subject
2007	3	2 Disability 1 Gender
2008	3	3 Gender
2009	3	1 Race 1 Gender

		1 Maternity
2010	2	1 Race 1 Age
2011	2	1 Disability 1 Pregnancy

Aviation Licences

The CAA currently keeps limited information on the gender of licence applicants and current holders. Annexe F shows this information.

The effect of our policies

Our employment policies, contained within an Employee Handbook, are reviewed periodically in line with the changing business environment. When a policy is reviewed, we gain employee involvement through a variety of means:

- Routine discussions with our recognised Trades Unions
- A Diversity Working Group (DWG) consisting of managers, Trade Union and Employee Representatives
- Employee Strategy Consultation Forums. The impact of our policies on employees and external stakeholders in respect of Equality and Diversity are discussed at a strategic level with representatives.
- Ad-hoc reviews. We have conducted thorough reviews of our policies in partnership with employee representatives, in response to specific needs or requests. For example we involved representatives directly in forming our Disability Equality Scheme. We followed the same process to review our policies in order to promote Age equality.

Network Groups

We have considered the establishment of Networks of employees from under-represented groups who could provide input to policy formulation and review. We fully consulted employees on this proposal and their response was that, because of our small workforce in comparison to, say Government Departments, rather than have separate Networks for each under-represented group, to have a group that contributed to policy formulation and review across all of the protected characteristics. This is achieved through our Diversity Working Group currently. We respect the view of our employees in this respect, but intend to regularly review our position and compare ourselves with other employers.

Awareness training

The CAA provides training to keep employees up to date and aware of current legislation and issues related to Equality and Diversity at work. The current approach is to focus training soon after recruitment, with courses being mandatory as follows:

- For new employees (to be completed within 6 months of starting CAA employment)
- Module 1 for managers (to be completed within 6 months of taking up a role with responsibility for other employees)
- Module 2 for managers (to be completed between 2 and 3 years after module 1)

These courses are evaluated and regularly reviewed to ensure they are meeting their aims and objectives. We are conscious however that this approach cannot in itself provide confidence either that behaviour is appropriate following training, nor that employees have kept up-to-date in this area after they have been with CAA a few years, and we are currently considering options in this area.

Next steps

We have set up a CAA Equality and Diversity Working Group, consisting of Trade Union and Employee Representatives, business managers and representatives of key functions. The Group, led by the director of our Regulatory Policy Group, has as its terms of reference:

- To develop further the vision of where CAA is heading, and to translate that into practical actions that it recommends to our Executive Committee (ExCo).
- To facilitate engagement in Diversity
- To establish an evidence-based rationale for action

One of the Group's first tasks is to consider all the available CAA Equality information and to prioritise improvement activity for the next 3 years. The planned improvement activity will be published in our Equality and Diversity Objectives Report. In addition to improvement activity, it will address any current gaps in information that need to be filled in order for us to fully grasp our current performance and then to derive actions.

Our Equality and Diversity Objectives Report will describe our ambitions to accelerate the rate of progress in representation of ethnic minorities and disabled people. It will also set out our goals and plans in respect of all the Protected Characteristics in relation to employment, regulation and licensing.

Annexes:

A Organisational values
B CAA Equality & Diversity policy
C CAA Harassment policy
D Workforce profile
E Recruitment profile
F Aviation licence applicants and holders

CAA Values & Behaviours Framework

These behaviours support the achievement of the CAA's strategic ambition and goals, and the delivery of the principles of better regulation. We expect all colleagues to work both internally and externally in a manner which is consistent with our values.

INTEGRITY

Guides our actions

If I am acting with integrity I will do things like…	If I am acting without integrity I will do things like…
✓ Raise issues and concerns so that action can be taken	× Not apply sufficient rigour to ensure data/ analysis is accurate
✓ Act on behalf of the CAA even when this is personally difficult	× Commit to action and then not deliver them
✓ Take positive action when I see others acting in a way that is inconsistent with our values	× Constantly moan at decisions taken without raising these concerns through the proper channels
✓ Admit and acknowledge mistakes when they occur and take appropriate action	× Favour some stakeholders over others
✓ Respect confidentiality	× Have a "Do as I say, not as I do" attitude
✓ Take personal ownership to achieve tasks, address issues and demonstrate the values	× Put personal rights and entitlements before duties and responsibilities
✓ Act consistently internally and externally	

RESPECT

Makes our working relationships effective

If I am acting respectfully I will do things like…	If I am acting disrespectfully I will do things like…
✓ Give praise and recognition for work well done	× Blame others when things go wrong
✓ Engage with colleagues and stakeholders by always giving respect first	× Not allow colleagues or stakeholders an opportunity to deliver their point of view; cut them off for no reason
✓ Be courteous when dealing with others	× Undermine my colleagues or stakeholders, either when they are present or not present
✓ Keep an open mind when listening to other viewpoints	× Ignore, sideline or leave people out of discussions that they should be part of
✓ Create a trusting and open working relationship	× Work in a way that is condescending, patronising and/ or arrogant
✓ Welcome and encourage contributions when there is a need to gather opinions	
✓ Respond to contributions and manage expectations	

COLLABORATION

Gets the right people involved at the right time

If I am acting collaboratively I will do things like…	If I am acting in isolation I will do things like…
✓ Be inclusive, involving all the relevant people at the right time	× Create conflict and unnecessary competition between groups/ individuals and teams/ department
✓ Build productive working relationships and a positive climate of teamwork	× Be unresponsive to requests from others
✓ Develop and maintain an effective network of internal and external contacts	× Find excuses to work in isolation
✓ Operate confidently across organisational boundaries	× Not invite or respond constructively to suggestions made by others
✓ Proactively provide help and support to others to get the job done whether in own or other department/ group	× Be unaware of the importance of engaging with others
✓ Constructively deal with others even when they may appear to be an obstacle to progress	× Be unable to see where tradeoffs might be achievable / necessary to achieve the desired outcome
	× Involve others as an afterthought / too late in the process

CLARITY

Is what people can expect from us

If I am acting with clarity I will do things like…	If I am acting without clarity I will do things like…
✓ Clearly communicate decisions that have been taken and the rationale behind them	× Provide inconsistent information
✓ Explain what needs to be done in a clear and straightforward way	× Communicate using excessive jargon/acronyms
✓ Clarify outcomes to be achieved and why	× Take action without thinking through a problem
✓ Provide information in a way that helps decision making	
✓ Communicate the potential consequences of actions / decisions	
✓ Set priorities	
✓ Clarify complex and changing situations in ways that will enable others to act	

LEARNING

Makes sure we take the initiative to improve

If I am demonstrating learning I will do things like…	If I am not learning I will do things like…
✓ See learning as ongoing, at a personal level and improve my ways of working	× View personal development as a waste of time
✓ Keep up to date with developments in my professional discipline, work area, organisation and industry	× Not participate fully in the PMR process
✓ Challenge current ways of doing things and look for opportunities to improve	× Be unresponsive to feedback
✓ Share knowledge, ideas, experience and information with others formally and informally	× Think that 'I' know best
✓ Ask for and act on feedback	× Assume that what was right for yesterday is best for tomorrow
✓ Look for opportunities to expand experience	× Overly rely on training courses for learning
✓ Display an interest in new ideas and future trends	
✓ Ask 'what might I not know' about work related tasks and issues	

DRIVE

Delivers tangible outcomes efficiently

If I am acting with drive I will do things like…	If I am acting without drive I will do things like…
✓ Make commitments and deliver what is promised within agreed timescales	× Expect momentum to come from other people
✓ Take the initiative to resolve issues	× Find excuses not to deliver what is needed
✓ Take responsibility for delivering key tasks and objectives	× Jump straight to action and / or solution
✓ Display a pro active and positive attitude	× Jump inappropriately to action and or solution, without asking 'Is there any other solution?'
✓ Tackle work with energy, pace and resilience to achieve the desired outcomes	× Take an "I'm just doing what I was told" attitude
✓ Be motivated to work hard to get the job done	× Allow personal fears or worries to get in the way of delivering the desired outcomes
	× Be complacent

CAA Equality Information Report – Annex B

CAA EQUALITY AND DIVERSITY POLICY

1 Policy Statement

1.1 The CAA is committed to ensuring equality of opportunity. It is our policy to treat all employees and job applicants fairly and equally regardless of their sex, sexual orientation, marital status, age, disability, race, colour, nationality, ethnic or national origin, religion or belief.

1.2 In respect of recruitment, career progression and development, the CAA will ensure that no requirement or condition will be imposed without justification that could disadvantage an individual on any of the above grounds. Wherever possible, efforts will be made to identify and remove unnecessary or unjustifiable barriers and provide appropriate facilities and employment conditions to meet the needs of any underrepresented groups.

1.3 We are committed to the implementation of this policy and to a programme of action to ensure that the policy is, and continues to be, fully effective. We will regularly review supporting policies, procedures and selection criteria to ensure that individuals are selected, promoted and otherwise treated according to their relevant individual abilities and merits. All employees are required to attend equality and diversity awareness training.

1.4 To ensure this policy is operating effectively, and for no other purpose, the CAA maintains records of employees and applicant's racial origins, gender, disability and age group. Ongoing monitoring and analysis of this information will form the basis for appropriate action to eliminate discrimination and promote equality of opportunity.

2 Objectives

2.1 The objectives of this policy are to:

- Ensure that the CAA has access to the widest labour market and secures the best employees for its needs.
- Ensure that no employee or applicant receives less favourable treatment and that, wherever possible, they are given the help they need to attain their full potential to the benefit of the CAA and themselves.
- Achieve a workforce reflective of the working population in any relevant market areas.

3 Workplace Benefits

3.1 The CAA values the different ways employees contribute to organisational goals and performance. We aim to provide everyone with the opportunity to contribute and compete on equal terms and we promote fairness by ensuring that decisions made about people are based on merit.

3.2 The CAA recognises the positive contribution that individual differences can bring and how these factors will support the CAA's stated Mission, Value and Guiding Principles in particular:

- Maintaining and developing excellence in people.

- Working together effectively, internally and externally.
- Developing and empowering staff, and valuing their contribution.
- Continuously improving performance and processes.

3.3 The CAA's commitment to taking action to embed equality and diversity into the organisation is relevant to all that we do and we will:

- Understand, value and welcome equality and diversity in our workforce.
- Ensure that all relevant policies reflect our commitment to action.
- Promote positive behaviours by treating people with respect, consideration and without prejudice.
- Support the use of flexible working patterns wherever possible to enable employees to balance work and home responsibilities.

4 Ownership

4.1 Accountability for this policy rests with the CAA Executive Committee Members who will:

- Demonstrate commitment to equality of opportunity.
- Be responsible and accountable for the development of equality and diversity.
- Review progress towards equality and diversity actions as part of the normal planning cycle.

4.2 Particular responsibility for this policy falls upon managers generally and upon all those professionally involved in recruitment, selection and training activity. Managers have a responsibility for ensuring that the CAA's values and commitment to this policy are clearly communicated to employees and that any supporting initiatives are put into effective operation. Managers will:

- Demonstrate and promote considerate and fair behaviour and contribute to the advancement of equality and diversity in the CAA.
- Promote a supportive working environment.
- Ensure that any unacceptable behaviour is addressed.

4.3 All employees are responsible for ensuring that the aims and values in the policy are supported at a working level and will:

- Treat everyone with respect and without prejudice.
- Promote positive behaviours in colleagues.

4.4 Full co-operation is essential for the success of this policy and all employees are required to comply with this policy and act in accordance with its objectives so as to remove any potential barriers to equal opportunity. The CAA has no wish to influence people in their personal beliefs but specifically disassociates itself from any activity that challenges our commitment to equality of opportunity and diversity.

4.5 If any employee feels discriminated against or treated in a way that is inconsistent with this policy, they should initially seek to resolve the matter informally. They may find it helpful to consult their HR Adviser about the help and support available. If this does not result in a satisfactory outcome for them, or the

matter is more serious, the grievance procedure is available. Any act of discrimination by employees or any failure to comply with the terms of the policy will be treated as a disciplinary offence. In serious cases such behaviour may be deemed to constitute gross misconduct and may result in summary dismissal. Further guidance on dealing with discrimination or associated harassment is available in the booklet "Equality Matters: An Employee Guide".

5 Background to this policy

5.1 The CAA Equality and Diversity Policy, and the measures to implement it, have been devised on the basis of advice from relevant professional bodies and in consideration of relevant legislation. An illustrative list of examples is given below:

Professional bodies:
Equality & Human Rights Commission
ACAS
CIPD
Employers' Forums on Age and Religion/Belief

Relevant Legislation:
Equality Act 2010
Public Sector Equality Duty (s149 of Equality Act 2010)

CAA Equality Information Report – Annex C

Harassment Policy

1 INTRODUCTION

In support of its Equality and Diversity Policy, the CAA operates a procedure for dealing with allegations of harassment or bullying.

All forms of harassment or bullying are regarded as unacceptable behaviours by the CAA and will be dealt with under this policy. Furthermore, intentional harassment, which includes using threatening, insulting or abusive words or behaviour towards any person; or displaying threatening, insulting or abusive writing or pictures, is a criminal offence.

2 WHAT ARE HARASSMENT AND BULLYING

2.1 Harassment is unwanted conduct that violates people's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment in the workplace. It is conduct that infringes an individual's human rights and in particular may be related to sex, sexual orientation, age, disability, race, colour, nationality, ethnic or national origin, religion or belief.

2.2 Bullying is a form of harassment and is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power with the intention of undermining, humiliating or injuring the individual. As an offence, bullying might 'overlap' other forms of misconduct such as harassment.

2.3 Harassment and bullying may take the form of the following behaviours (these are not exhaustive):

- offensive written or spoken comments, including inappropriate jokes or gestures (particularly on the grounds of race, sex, age, disability, sexual orientation and religion or belief)
- unwelcome sexual advances – touching, standing too close, display of offensive materials
- overbearing supervision or other misuse of power or position
- exclusion or victimisation
- unfair treatment

2.4 Bullying and harassment do not necessarily occur face to face, they may occur through other means such as written communications, e-mail, and phone.

2.5 Harassment can take the form of persistent behaviour occurring over a period of time, or one incident alone may constitute harassment. It is important to remember that whatever forms the harassment takes, it is not the intention of the perpetrator, but the deed itself and the impact on the individual which determines what constitutes harassment, i.e. that the individual finds the conduct unwelcome and unwanted.

2.6 Bullying is the abuse of power through means intended to undermine, humiliate, denigrate or injure the individual. This occurs for example when an individual attempts to control or manipulate others through fear; when an employee becomes the object of a group's unwelcome attentions; or when an individual is

consistently offensive to colleagues or customers. As an offence, bullying might 'overlap' other forms of misconduct such as harassment.

3 RESPONSIBILITIES

3.1 All employees have a responsibility not to use behaviour amounting to harassment and bullying as described above. Those who do so may leave themselves open to action under the Disciplinary Process. All employees involved in the investigation and/or follow up procedures related to alleged cases of harassment are required to maintain confidentiality.

3.2 If an employee knowingly makes a false complaint, they may be subject to action under the Disciplinary Process.

3.3 All managers are expected to demonstrate the required standards of conduct and behaviour, and to ensure that all employees reporting to them are made aware of those standards.

3.4 Managers also have a responsibility to ensure that the terms of this policy are fairly and consistently applied.

3.5 In cases of alleged harassment, the investigation and informal/formal proceedings must be treated sensitively. Managers involved in the investigation and/or follow up procedures are expected to maintain confidentiality. They must investigate all reported incidents of harassment thoroughly, but without delay.

3.6 All managers must seek to ensure that any employee who brings a complaint of harassment, or anyone who has acted as a witness during an investigation does not suffer victimisation for having brought the complaint or for being a witness. When considering remedial actions, all reasonable steps must be taken to minimise the potential for any disadvantage to the individual.

4 MAKING A COMPLAINT ABOUT HARASSMENT OR BULLYING

4.1 Employees who experience any behaviour which they find personally unacceptable should first deal with the matter informally if this is appropriate, by making it clear to the person concerned that they find the behaviour offensive and unwelcome and that if repeated, a formal complaint to their manager may be made.

4.2 If an employee feels unable to do this verbally, they can make a written request to the person against whom the complaint is made, explaining the distress that the behaviour is causing.

4.3 Employees may find it helpful to seek the support of a colleague, or, where appropriate, advice from their trade union, when speaking (or writing) to the person concerned. Often the person is unaware that their conduct is causing offence and a quick word may resolve the situation without the need for more formal action. This action should be taken as soon as practicable.

4.4 If speaking or writing to the person does not succeed, the employee should normally report the matter to their line manager, if they have not already done so, as managers have a specific responsibility to resolve the matter with reference to this Policy. The employee may, if they wish, be accompanied by a CAA colleague or Trade Union representative at such a meeting.

4.5 Any employee who does not feel able to approach their line manager, (e.g. because they are the person against whom the complaint is made), or who has approached their manager but is concerned that the spirit of the Harassment Policy has not been observed, should approach their HR representative. HR will also be able to advise how the spirit of this policy will be observed in cases of a particularly sensitive or complex nature.

4.6 Whilst informal methods such as speaking or writing to the employee are a logical first step towards the satisfactory resolution of instances of harassment, it should be noted that the individual might invoke the Grievance Process. If the manager believes harassment has occurred, they have the ability to invoke the Disciplinary Process.

5 INFORMATION AND SUPPORT

Support for employees and further information about this policy are available from HR representatives. Additional information and general guidance is given in the employee guide on Equality & Diversity. Confidential guidance and support can also be provided through the CAA's Employee Assistance Programme. Details of this programme are available on the CAA intranet or form HR representatives.

Annex D

CAA workforce profile as at 30 November 2011

(ALL LOCATIONS)

Gender			
CAA Group	Total Employees	Female	% Female
Air Safety Support International	19	6	31.58
CAA International Services Ltd	33	17	51.52
Consumer Protection Group	62	25	40.32
Corporate and Ancillary	185	84	45.41
Directorate Airspace Policy	61	11	18.03
Regulatory Policy Group	58	25	43.10
RPG Surveys	99	81	81.82
Safety Regulation Group	577	207	35.88
Secondment	3	1	33.33
CAA	1097	457	41.66

Ethnicity			
CAA Group	Total Employees	Ethnic minority	% Ethnic minority
Air Safety Support International	19	1	5.26
CAA International Services Ltd	33	3	9.09
Consumer Protection Group	62	4	6.45
Corporate and Ancillary	185	11	5.95
Directorate Airspace Policy	61	3	4.92
Regulatory Policy Group	58	13	22.41
RPG Surveys	99	3	3.03
Safety Regulation Group	577	31	5.37
Secondment	3	0	0.00
CAA	1097	69	6.29

Disability			
CAA Group	Total Employees	Disabled	% Disabled
Air Safety Support International	19	1	5.26
CAA International Services Ltd	33	0	0.00
Consumer Protection Group	62	1	1.61
Corporate and Ancillary	185	1	0.54
Directorate Airspace Policy	61	1	1.64
Regulatory Policy Group	58	1	1.72
RPG Surveys	99	0	0.00
Safety Regulation Group	577	5	0.87
Secondment	3	0	0.00
CAA	1097	10	0.91

Age group													
CAA Group	Total Employees	Age 15-24	% Age 15-24	Age 25-34	% Age 25-34	Age 35-44	% Age 35-44	Age 45-54	% Age 45-54	Age 55-64	% Age 55-64	Age 65+	% Age 65+
Air Safety Support International	19	0	0.00	0	0.00	5	26.32	10	52.63	3	15.79	1	5.26
CAA International Services Ltd	33	0	0.00	8	24.24	12	36.36	9	27.27	4	12.12	0	0.00
Consumer Protection Group	62	7	11.29	18	29.03	14	22.58	19	30.65	4	6.45	0	0.00
Corporate and Ancillary	185	2	1.08	29	15.68	57	30.81	59	31.89	35	18.92	4	2.16
Directorate Airspace Policy	61	0	0.00	9	14.75	20	32.79	20	32.79	12	19.67	0	0.00
Regulatory Policy Group	58	0	0.00	14	24.14	21	36.21	16	27.59	7	12.07	0	0.00
RPG Surveys	99	1	1.01	2	2.02	12	12.12	24	24.24	47	47.47	12	12.12
Safety Regulation Group	577	6	1.04	49	8.49	104	18.02	251	43.50	163	28.25	4	0.69
Secondment	3	0	0.00	0	0.00	0	0.00	2	66.67	1	33.33	0	0.00
CAA	1097	16	1.46	129	11.76	245	22.33	410	37.37	276	25.16	21	1.91

CAA workforce profile as at 30 November 2011 (LONDON)

Gender			
CAA Group	Total Employees	Female	% Female
Air Safety Support International	0	0	0.00
CAA International Services Ltd	0	0	0.00
Consumer Protection Group	62	25	40.32
Corporate and Ancillary	71	32	45.07
Directorate Airspace Policy	61	11	18.03
Regulatory Policy Group	58	25	43.10
RPG Surveys	50	40	80.00
Safety Regulation Group	0	0	0.00
Secondment	0	0	0.00
CAA	302	133	44.04

Ethnicity			
CAA Group	Total Employees	Ethnic minority	% Ethnic minority
Air Safety Support International	0	0	0.00
CAA International Services Ltd	0	0	0.00
Consumer Protection Group	62	4	6.45
Corporate and Ancillary	71	6	8.45
Directorate Airspace Policy	61	3	4.92
Regulatory Policy Group	58	13	22.41
RPG Surveys	50	2	4.00
Safety Regulation Group	0	0	0.00
Secondment	0	0	0.00
CAA	302	28	9.27

Disability			
CAA Group	Total Employees	Disabled	% Disabled
Air Safety Support International	0	0	0.00
CAA International Services Ltd	0	0	0.00
Consumer Protection Group	62	1	1.61
Corporate and Ancillary	71	1	1.41
Directorate Airspace Policy	61	1	1.64
Regulatory Policy Group	58	1	1.72
RPG Surveys	50	0	0.00
Safety Regulation Group	0	0	0.00
Secondment	0	0	0.00
CAA	302	4	1.32

Age group													
CAA Group	Total Employees	Age 15-24	% Age 15-24	Age 25-34	% Age 25-34	Age 35-44	% Age 35-44	Age 45-54	% Age 45-54	Age 55-64	% Age 55-64	Age 65+	% Age 65+
Air Safety Support International	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
CAA International Services Ltd	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Consumer Protection Group	62	7	11.29	18	29.03	14	22.58	19	30.65	4	6.45	0	0.00
Corporate and Ancillary	71	1	1.41	11	15.49	17	23.94	23	32.39	15	21.13	4	5.63
Directorate Airspace Policy	61	0	0.00	9	14.75	20	32.79	20	32.79	12	19.67	0	0.00
Regulatory Policy Group	58	0	0.00	14	24.14	21	36.21	16	27.59	7	12.07	0	0.00
RPG Surveys	50	1	2.00	2	4.00	4	8.00	14	28.00	21	42.00	8	16.00
Safety Regulation Group	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Secondment	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
CAA	302	9	2.98	54	17.88	76	25.17	92	30.46	59	19.54	12	3.97

CAA workforce profile as at 30 November 2011 (SOUTH EAST)

Gender			
CAA Group	Total Employees	Female	% Female
Air Safety Support International	19	6	31.58
CAA International Services Ltd	32	17	53.13
Consumer Protection Group	0	0	0.00
Corporate and Ancillary	100	46	46.00
Directorate Airspace Policy	0	0	0.00
Regulatory Policy Group	0	0	0.00
RPG Surveys	12	9	75.00
Safety Regulation Group	474	184	38.82
Secondment	0	0	0.00
CAA	637	262	41.13

Ethnicity			
CAA Group	Total Employees	Ethnic minority	% Ethnic minority
Air Safety Support International	19	1	5.26
CAA International Services Ltd	32	3	9.38
Consumer Protection Group	0	0	0.00
Corporate and Ancillary	100	5	5.00
Directorate Airspace Policy	0	0	0.00
Regulatory Policy Group	0	0	0.00
RPG Surveys	12	0	0.00
Safety Regulation Group	474	27	5.70
Secondment	0	0	0.00
CAA	637	36	5.65

Disability			
CAA Group	Total Employees	Disabled	% Disabled
Air Safety Support International	19	1	5.26
CAA International Services Ltd	32	0	0.00
Consumer Protection Group	0	0	0.00
Corporate and Ancillary	100	0	0.00
Directorate Airspace Policy	0	0	0.00
Regulatory Policy Group	0	0	0.00
RPG Surveys	12	0	0.00
Safety Regulation Group	474	4	0.84
Secondment	0	0	0.00
CAA	637	5	0.78

Age group													
CAA Group	Total Employees	Age 15-24	% Age 15-24	Age 25-34	% Age 25-34	Age 35-44	% Age 35-44	Age 45-54	% Age 45-54	Age 55-64	% Age 55-64	Age 65+	% Age 65+
Air Safety Support International	19	0	0.00	0	0.00	5	26.32	10	52.63	3	15.79	1	5.26
CAA International Services Ltd	32	0	0.00	8	25.00	12	37.50	8	25.00	4	12.50	0	0.00
Consumer Protection Group	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Corporate and Ancillary	100	1	1.00	16	16.00	36	36.00	32	32.00	15	15.00	0	0.00
Directorate Airspace Policy	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Regulatory Policy Group	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
RPG Surveys	12	0	0.00	0	0.00	2	16.67	1	8.33	9	75.00	0	0.00
Safety Regulation Group	474	6	1.27	42	8.86	88	18.57	202	42.62	133	28.06	4	0.84
Secondment	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
CAA	637	7	1.10	66	10.36	143	22.45	253	39.72	164	25.75	5	0.78

CAA workforce profile as at 30 November 2011

(REGIONAL OFFICES & REMOTE WORKERS)

Gender			
CAA Group	Total Employees	Female	% Female
Air Safety Support International	0	0	0.00
CAA International Services Ltd	1	0	0.00
Consumer Protection Group	0	0	0.00
Corporate and Ancillary	14	6	42.86
Directorate Airspace Policy	0	0	0.00
Regulatory Policy Group	0	0	0.00
RPG Surveys	37	32	86.49
Safety Regulation Group	103	23	22.33
Secondment	3	1	33.33
CAA	158	62	39.24

Ethnicity			
CAA Group	Total Employees	Ethnic minority	% Ethnic minority
Air Safety Support International	0	0	0.00
CAA International Services Ltd	1	0	0.00
Consumer Protection Group	0	0	0.00
Corporate and Ancillary	14	0	0.00
Directorate Airspace Policy	0	0	0.00
Regulatory Policy Group	0	0	0.00
RPG Surveys	37	1	2.70
Safety Regulation Group	103	4	3.88
Secondment	3	0	0.00
CAA	158	5	3.16

Disability			
CAA Group	Total Employees	Disabled	% Disabled
Air Safety Support International	0	0	0.00
CAA International Services Ltd	1	0	0.00
Consumer Protection Group	0	0	0.00
Corporate and Ancillary	14	0	0.00
Directorate Airspace Policy	0	0	0.00
Regulatory Policy Group	0	0	0.00
RPG Surveys	37	0	0.00
Safety Regulation Group	103	1	0.97
Secondment	3	0	0.00
CAA	158	1	0.63

Age group													
CAA Group	Total Employees	Age 15-24	% Age 15-24	Age 25-34	% Age 25-34	Age 35-44	% Age 35-44	Age 45-54	% Age 45-54	Age 55-64	% Age 55-64	Age 65+	% Age 65+
Air Safety Support International	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
CAA International Services Ltd	1	0	0.00	0	0.00	0	0.00	1	100.00	0	0.00	0	0.00
Consumer Protection Group	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Corporate and Ancillary	14	0	0.00	1	7.14	4	28.57	4	28.57	5	35.71	0	0.00
Directorate Airspace Policy	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Regulatory Policy Group	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
RPG Surveys	37	0	0.00	1	2.70	6	16.22	9	24.32	17	45.95	4	10.81
Safety Regulation Group	103	0	0.00	7	6.80	16	15.53	49	47.57	31	30.10	0	0.00
Secondment	3	0	0.00	0	0.00	0	0.00	2	66.67	1	33.33	0	0.00
CAA	158	0	0.00	9	5.70	26	16.46	65	41.14	54	34.18	4	2.53

ALL CAA Oct-11

Grade	Employees	Females	% Female	Ethnic Min	% Ethnic minority	Disabled	% Disabled	Age 55+	% Age 55+
Personal contract	145	31	21.38	8	5.52	1	0.69	47	32.41
Grade 1	40	3	7.50	0	0.00	0	0.00	16	40.00
Grade 2	93	8	8.60	3	3.23	1	1.08	23	24.73
Grade 3	219	25	11.42	8	3.65	1	0.46	71	32.42
Grade 4	62	19	30.65	5	8.06	1	1.61	10	16.13
Grade 5	83	36	43.37	6	7.23	4	4.82	6	7.23
Grade 6	101	60	59.41	10	9.90	0	0.00	11	10.89
Grade 7	123	90	73.17	10	8.13	0	0.00	24	19.51
Grade 8	102	88	86.27	14	13.73	1	0.98	26	25.49
Grade 9	80	65	81.25	5	6.25	1	1.25	38	47.50
Grade 10	6	4	66.67	1	16.67	0	0.00	0	0.00
Casual	22	19	86.36	0	0.00	0	0.00	17	77.27
Other	9	5	55.56	0	0.00	0	0.00	6	66.67
ALL CAA	1085	453	41.75	70	6.45	10	0.92	295	27.19

Sick Absence Nov 2010 - Oct 2011				
Total days lost per employee	Male	Female	White	Ethnic Min
5.62	2.27	3.36	5.38	0.25

Employee Turnover Nov 2010 - Oct 2011				
Employee Total turnover %	Male	Female	White	Ethnic Min
9.73	5.18	4.55	9.09	0.55
Employee Voluntary turnover %	Male	Female	White	Ethnic Min
4.45	2.55	1.91	4.09	0.27

Annex E

All Applicants: Rolling Year 1st December 2010 to 30 November 2011

Gender						
Gender	**Applicants**	**Percentage**	**Invited**	**Percentage**	**Selected**	**Percentage**
Male	1459	74.82%	127	74.27%	28	68.29%
Female	452	23.18%	40	23.39%	12	29.27%
Unspecified	39	2.00%	4	2.34%	1	2.44%
Total	**1950**	**100%**	**171**	**100%**	**41**	**100%**
Disability						
Disability	**Applicants**	**Percentage**	**Invited**	**Percentage**	**Selected**	**Percentage**
Able	1907	97.79%	169	98.83%	41	100.00%
Disabled	43	2.21%	2	1.17%	0	0.00%
Unspecified	0	0.00%	0	0.00%	0	0.00%
Total	**1950**	**100%**	**171**	**100%**	**41**	**100%**
Ethnicity						
Ethnicity	**Applicants**	**Percentage**	**Invited**	**Percentage**	**Selected**	**Percentage**
White	1293	66.31%	140	81.87%	31	75.61%
Mixed	33	1.69%	2	1.17%	2	4.88%
Asian/Asian British	214	10.97%	5	2.92%	2	4.88%
Black/Black British	135	6.92%	3	1.75%	1	2.44%
Chinese	12	0.62%	1	0.58%	0	0.00%
Other	242	12.41%	17	9.94%	3	7.32%
Unspecified	21	1.08%	3	1.75%	2	4.88%
Total	**1950**	**100%**	**171**	**100%**	**41**	**100%**

Flight crew and Aircraft maintenance engineer licence applications

1/11/2010 - 31/10/2011

Sex	Licence Applications	Licences issued	% of total applications	% of total licences issued	Success rate %	Licence Category	Applications Made By Licence Category	Licences issued by category	Success rate %
F	580	374	6.57	6.13	64	Aircraft Maintenance	16	16	100
						Flight Crew	564	358	63
M	8249	5725	93.43	93.87	69	Aircraft Maintenance	468	468	100
						Flight Crew	7781	5257	68
Total	8829	6099							

Flight crew licence holders as at 30 November 2011

Total licence holders	Sex	Individuals By Gender	% of total licence holders
40905	F	2198	5.37
	M	38707	94.63

n.b. Figures shown above are for licence holders with a valid JAR medical certificate

Aircraft Maintenance Engineer licence holders as at 30 November 2011

Total licence holders	Sex	Individuals By Gender	% of total licence holders
12498	F	123	0.98
	M	12375	99.02