Written response to the recommendations from FirstGroup

Thank you for asking FirstGroup to comment on the Scottish Parliament’s Equal Opportunities Committee Report, ‘Removing Barriers and Creating Opportunities’.

Here at First we are committed to transforming travel for all of our passengers and making our services accessible and inclusive for all. Underpinning our commitment disabled passengers is our Diversity Policy, which clearly states this intention. This is enclosed / attached for your information.

Both in bus and rail services, we train our staff to anticipate and respond to the need of disabled passengers and colleagues in a proactive way. We are always looking for ways to improve our services, as shown by the work, for example, of our Diversity Action Group in UK Bus. This group is made up from all of the disciplines in our business from Human Resources to Marketing, Operations to Training, who work on ways to further improve our services to disabled customers.

We would be happy to meet with you to discuss our work further should you feel it useful.

In response to the recommendations of the report I would like to respond to them by number as follows:

Recommendation 3

First uses the social model of disability when considering our service and employment accessibility issues. Whilst we are not obliged to produce a Disability Equality Duty, we are using the Disability Rights Commission’s six pillars on the DED as a guide for our plans and activities.

These being to:
1. Eliminate disability related harassment
2. Promote equal opportunities
3. Eliminate unlawful discrimination
4. Promote positive attitudes toward disabled persons
5. Encourage participation by disabled persons in public life
6. Take steps to take account of disabled persons’ disabilities, even where that involves treating disabled persons more favourably than other persons.

Recommendation 7

We are in the process of introducing Diversity measures as part of staff & managers’ job descriptions and in their appraisals. This is being further rolled out across the business in 2008.
Recommendation 15

We would welcome any approach by the Scottish Executive and relevant agencies to form networks to promote disability equality and accessibility to employment and services.

Recommendation 20

We have a positive and non-discriminatory approach to all of our recruitment activities. Recruitment training has a section on employing disabled colleagues and our responsibilities in making reasonable adjustments where necessary.

Recommendation 90

Although, as a commercial service provider we do not have a duty to produce a Disability Equality Scheme, we do have an action plan to improve accessibility to services and employment in our UK bus operations.

Recommendation 96

We would welcome, and happily be part of any campaign that promotes an awareness of disabled customers’ and colleagues’ needs with other commercial organisations.

Recommendation 109 and 110

We ensure that, where we are responsible for access, that railway stations in Scotland are accessible for disabled passengers. We would welcome an approach from the Scottish Executive with regard to making Rail Stations more accessible where necessary.

Recommendation 112

We are committed to ensuring that our vehicle fleets meet the statutory accessibility requirements by the agreed deadlines under the DDA. We would welcome any assistance or support from national or local government in regard to making our fleets of vehicles fully accessible ahead of those deadlines.

Recommendation 113

We provide much of our public information in alternative format and are working to provide further improvements in 2008. These will include enhanced web accessibility and online large print timetables, for example.
Recommendation 114

We are currently in the process of training managers in our Making Reading Easier campaign which looks at the readability of the information we produce and how best to communicate with others.

In our UK bus operation we are doing a great deal of work around improving adult literacy and numeracy and were one of the first UK Businesses to sign the Governments’ Skills Pledge.

Recommendation 115

We have, and are further developing real time GPRS bus tracking in many areas our operations. We are looking for ways to highlight which services will be accessible, for example for wheelchair users, on the bus stop displays.

Recommendation 116, 117 & 118

We have an ongoing program of training for all customer facing staff in disability and diversity skills.

Through our UK Bus Diversity action group we are developing monitoring and audit systems to ensure we meet our own minimum requirements.

Recommendation 122

We would welcome such feedback if it were available.

Recommendation 136

We are working in partnership with the Shaw Trust to ensure our websites are accessible for all users no matter what their disability may be. This is a lengthy process but essential to make our services accessible to disabled people where it was not accessible before.

Recommendation 137 & 138

We are working to ensure we are able to provide accessible services consistently across our operations before actively promoting them, Where we can guarantee this, we actively promote services such as braille timetables on our train services.

Moir Lockhead
Chief Executive
FirstGroup
7 December 2007
SECTION 3

EMPLOYMENT

In formulating its employment policies, FirstGroup is guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its Guidelines for Multinational Enterprises. These Guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of FirstGroup and its subsidiaries.

3.1 Equal Opportunities and Diversity Policy

a) The Board of Directors of FirstGroup is committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out FirstGroup’s commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.

b) We are committed to seeking continuous improvement and compliance with legislation based on the following principles.

- Everyone has the right to be treated with dignity and respect.
- We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor.
- We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment.
- All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times.
- Non-compliance with this policy will be treated seriously and will not be tolerated.

c) The Board of Directors of FirstGroup and the Managing Directors and Presidents of the separate business units of FirstGroup are required to ensure:

- They create a productive and safe working environment, promoting diversity and inclusion in their workforce;
- They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and
- They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

Legislation and Codes of Practice

d) We will comply with and ‘exceed where possible, current national and international legislation and relevant codes of practice in the countries where
we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

**Partner Organisations**

e) We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice. In the United Kingdom FirstGroup is a member of the Employers Forum on Disability, Opportunity Now and Race For Opportunity with representatives sitting on the Executive Board and National Quality Board of the National Centre for Diversity.

**Practices and Standard Operating Procedures**

f) Each division and operating company will put in place practices and standard operating procedures to ensure the commitments in this policy are applied and implemented throughout the organisation.

**Access to Company Premises**

g) We will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors as required by the Disability Discrimination Act (DDA) in the United Kingdom and the Americans with Disabilities Act (ADA) in the United States of America.

**Access to Vehicles**

h) We will also take reasonable steps to ensure that our vehicles are accessible to customers and staff and comply with the relevant legislation for the country in which they operate.

**Access to Information**

i) We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

**Recruitment**

j) All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

**Staff Training**

k) We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.
Complaints

I) Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures. Customers who feel they have grounds for complaint may pursue these through our operating company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone.

Reporting

m) We are committed to monitoring and reporting on our actions and achievements in relation to implementing this Diversity policy both internally and externally.

Audit

n) We are committed to ensuring that our operations comply with the requirements of this policy and will periodically audit its implementation.

3.2 Human Rights Policy

FirstGroup supports the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff.

a) We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.

b) We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.

c) Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.

d) We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.

e) Employees have the rights of freedom of association and collective bargaining We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management. Furthermore we support the right of our employees to exercise that right through a secret ballot.

f) We will negotiate in good faith with the properly elected representatives of our employees.
g) We will abide by the non-discrimination laws in every country where we operate.

h) We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.

i) We have formal grievance procedures through which staff can raise personal and work-related issues.

j) All staff will be given reasonable access to bathroom and rest facilities.

3.3 Data Protection

a) We will comply with the relevant principles governing data protection in each country in which we operate.