

Comma's Single Equality Scheme (SES)

1.1 Introduction

The purpose of the Comma Press Single Equality Scheme (SES) is to set out our commitment to equality and diversity in each strand of our activity. Comma Press recognises that inequalities exist in society because of discrimination in relation to age, disability, gender, race, religion/belief, and sexual orientation and we seek to address these inequalities where they act as barriers to participation in the arts, and in particular, to our artistic practice.

As an independent publisher with internationally recognised work in translation from many languages and cultures, we recognise that diversity in artistic practise is not merely a statutory requirement, but the lifeblood of our success. As such, this SES does not merely confirm our adherence to the following legislation:

- * Race Relations (Amendment) Act 2000;
- * Disability Discrimination Act 2005;
- * Equality Act 2006;
- * The Equality Act 2010

But emphasises our commitment that, as an organisation, equality and diversity should be pervasive and evident in everything we do.

1.2 Context

1.2.1 Comma Press

Comma is a Manchester-based independent publishing house that launched in 2003 (as an unincorporated association) and incorporated as a Company Limited by Guarantee (not for profit) in 2007. Originally publishing novels and poetry, it quickly focussed on short fiction which, from 2006, also included short fiction in translation. It publishes between 6 and 8 titles a year, and delivers over a dozen public events and is involved in a further 15 per year. Comma also coordinates an annual commission and screening of short film adaptations under the banners Comma Film. The following is a summary of the short fiction it has published over the last four years.

Publications since Jan 2008 (total 378 stories):

BME: 80 (21.16%)

non-BME: 298 (79.84%)

1.2.2 Literature Northwest

LNW is a regional support agency founded in 2004 (originally titled 'Index Network') which provides professional and promotional support to the Northwest's independent publishing sector. It hosts networking sessions, CPD publishing seminars, a cross-publisher selling website, a regional literature information service, and cross-publisher public events, such as the Manchester Book Market. The first of these markets was co-delivered with DXN (Diversity Exchange Network) in September 2006, with a particular agenda to redress the diversity imbalance in mainstream publishing.

Although DXN disbanded in 2007, Literature Northwest was keen to continue the market and returned in the summer of 2009 to deliver the second instalment, in what has since become an annual fixture in the Manchester cultural calendar.

Despite DXN no longer being involved, LNW has been keen to continue its proactive Diversity agenda with regards to the authors it programmes for the live readings.

Market readings since Summer 2009 (total: 156 Performances):

BME: 37 (23.72%) non-BME: 119 (76.28%)

Female: 67 (42.95%) Male: 89 (57.05%)

LGBT figures are not currently available, but can be collated retrospectively.

2.1 Legal Context

The Equality Act 2010 introduces a consistent approach to most of the concepts that apply to the different equality 'strands', and which the Act calls 'protected characteristics'. The protected characteristics are:

- * Age
- * Disability
- * Sexual orientation
- * Gender reassignment
- * Marriage and civil partnership
- * Pregnancy and maternity
- * Race
- * Religion and belief or lack of religion or belief

The Act sets out the basic framework of protection against direct and indirect discrimination, harassment, victimisation and disability discrimination, which are referred to as 'prohibited conduct'. The types of discrimination covered by the Act are:

- * Direct discrimination
- * Discrimination by Association
- * Discrimination by Perception
- * Indirect discrimination
- * Harassment
- * Third Party harassment
- * Victimisation

Full definitions and examples of these types of discrimination can be found in the Equality Act 2010 Code of Practice; Services Public Functions and Associations Statutory Code of Practice document.

This SES further establishes Comma Press' commitment to anti-discriminatory policy as defined by the Equality Act 2010, and adherence to the guidance on implementation of protection against the types of discrimination as defined by the Act.

3.1 Governance and Strategic Objectives

Comma Press is governed by a Board of Directors, appointed on the basis of their experience and ability to assist and advise Comma in meeting its key objectives and supporting its strategic growth. The Board meets on a bi-annual basis to discuss standard operational issues, long-term strategy, and convenes additional reactive sessions as and when necessary. The status and effectiveness of our SES policy - including a review of our Equality Action Plan (EAP) targets - will be a standing item at Board of Directors' Meetings. The Board, working with the Managing Editor, will be responsible for checking the timed outcomes of the EAP at regular intervals, as well as shaping our SES and EAP criteria to respond to perceived needs to meet our overall SES goals. The Board will produce an annual report on the status of Comma Press' SES and EAP, making recommendations for further policy and EAP target implementation

when deemed necessary.

3.2 Equality Action Plan (EAP)

The Comma Press Equality Action Plan (EAP) is a schematic approach to implementing the objectives of the SES, tailored to the particular artistic practices of Comma Press (and Literature Northwest). It will be implemented over a three-year period (beginning April 2012) and reviewed annually. Its purpose is to provide a framework for:

- * Identifying and implementing SES objectives
- * Implementing SMART targets to monitor the impact of our SES policies
- * Identifying gaps in current provision
- * Defining staff responsibilities for participation in, and implementation of SES objectives
- * Ensuring SES policies reach each strand of our activity, and are appropriately tailored to our artistic discipline (literature and publishing)
- * Ensuring our partner organisations help us meet our SES objectives, and identifying whether new partners should be sought

3.3. Equal Opportunity Policy and Documentation in Training and Employment

Comma Press has an existing Equal Opportunities Policy, which specifies its responsibilities with regard to preventing discrimination in the recruitment of staff (be they full-time, part-time, or voluntary). While this policy previously focused on race, gender and sexual orientation, it has now been modified to cover all the protected characteristics as defined by the Equality Act 2010 (and listed above). A copy of this policy is available on request from Ra Page or the Board of Directors.

3.4 Partnerships

Comma Press works extensively with partner organisations at a regional, national and international level. In order to ensure that our SES is fully implemented, Comma Press will a) notify any potential partner of our SES before working with them and b) require our partners to agree to adhere to our SES standards in any work they undertake in partnership with us, as a standard term of any working agreement made with them (whether expressed contractually or otherwise). For clarification, a partner organization could be another publisher, a literary agent, a cultural institute or a literary festival.

3.5 Monitoring

Monitoring of this scheme will take place on an ongoing basis at a strategic level via the schedule of the Comma Press Board meetings. Progress reports will be undertaken annually from the summer of 2012.

Ongoing scrutiny and artist/audience involvement will continue with key stakeholders (see EAP below), including the collection of relevant data – where possible – at live events.

3.6 Publication and Access to equality information

The SES policy will be published on our website www.commapress.co.uk, as will our annual reports on the implementation of our SES policy, when signed off by the Board of Directors.