



# EQUALITY, DIVERSITY AND INCLUSION POLICY

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## 1. POLICY STATEMENT

- 1.1 We are committed to encouraging and promoting equality, diversity and inclusion for all staff and job applicants, and eliminating unlawful discrimination. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.
- 1.2 You, and any job applicants, will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (Protected Characteristics).
- 1.3 The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.
- 1.4 All staff have a duty to act in accordance with this policy and treat colleagues with dignity and respect at all times, and not to discriminate against or harass other members of staff, regardless of their status. Your attention is drawn to our separate Anti-harassment and Bullying Policy.

- 1.5 This policy does not form part of any employee's contract of employment and may be amended at any time. We may also vary elements, such as any time limits, as appropriate in any case.

## 2. WHO IS COVERED BY THIS POLICY?

- 2.1 This policy applies to all employees, directors and other officers, workers and agency workers, volunteers and interns.
- 2.2 We also require in any contracts with self-employed consultants or contractors that they comply with this policy. We will ensure they are given access to a copy.
- 2.3 All individuals covered in sections 2.1 and 2.2 are referred to as 'staff' in this policy .

## 3. WHO IS RESPONSIBLE FOR THIS POLICY?

- 3.1 While we ask all managers to take responsibility for making sure this policy is complied with, its successful operation also depends on you. Please take the time to read and understand it, and to go back to your manager with any questions you may have. References to Directors in this policy mean the most senior people within our organisation.
- 3.2 Directors have overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law.
- 3.3 All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives with regard to equality, diversity and inclusion. Managers will be given appropriate training on equality, diversity and inclusion awareness, including recruitment and selection best practice, when necessary.

## 4. SCOPE AND PURPOSE OF THE POLICY

- 4.1 This policy sets out our approach to equality, diversity and inclusion, and the avoidance of discrimination at work. It applies to all aspects of employment with us, including job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.
- 4.2 We will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.

## 5. FORMS OF DISCRIMINATION

- 5.1 You must not unlawfully discriminate against or harass other people including current and former staff, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts or when wearing a work uniform), and on work-related trips or events, including social events.
- 5.2 The following forms of discrimination are prohibited under this policy and are unlawful.
- a) **Direct discrimination:** this means treating someone less favourably because of one or more of the Protected Characteristics set out in section 1.2. For example, rejecting a job applicant because of their religious views, or making an offensive comment about a colleague because they

are transgender.

- b) **Indirect discrimination:** this means a provision, criterion or practice that applies to everyone but adversely affects people with a Protected Characteristic more than others, and is not justified. For example, a requirement to work full-time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be objectively justified.
- c) **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- d) **Victimisation:** this means retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- e) **Disability discrimination:** this can include direct and indirect discrimination, and means any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

## 6. RECRUITMENT AND SELECTION

- 6.1 We aim to ensure that no job applicant suffers discrimination because of any Protected Characteristic. Our recruitment, promotion and other selection exercises, such as redundancy selection, will be conducted on the basis of merit, against objective criteria that avoid discrimination. Procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Shortlisting of applicants will be done by more than one person, wherever possible.
- 6.2 Job advertisements will avoid stereotyping or using wording that may discourage groups with a particular Protected Characteristic from applying. Where possible, they will include an appropriate short policy statement on equality, diversity and inclusion, and a copy of this policy can be sent on request to those who enquire about vacancies.
- 6.3 We take steps to ensure that our job vacancies are advertised to a diverse section of the labour market, where it is necessary to recruit externally. Where appropriate, we may approve the use of lawful exemptions to recruit someone with a particular Protected Characteristic – for example, where the job can only be done by a woman. The advertisement should specify the exemption that applies.
- 6.4 Job applicants will not be asked about health or disability before a job offer is made. There are limited exceptions, for example:
  - a) questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments),
  - b) questions to establish if an applicant is fit to attend an assessment, or any reasonable adjustments that may be needed at interview or assessment,
  - c) positive action to recruit disabled persons, or

- d) Equality and Diversity Monitoring (which will not form part of the selection or decision-making process).
- 6.5 Where necessary, job offers may be made conditional on a satisfactory medical check.
- 6.6 Job applicants will not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants will not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment.
- 6.7 We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status will not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce the required documentation before employment starts, to satisfy current immigration legislation.

## **7. EQUALITY AND DIVERSITY MONITORING**

- 7.1 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we may monitor a number of characteristics of our workforce and job applicants as part of the recruitment procedure and our commitments set out in this policy. The characteristics monitored may include:
  - a) ethnic group,
  - b) gender,
  - c) disability or other health condition,
  - d) sexual orientation,
  - e) religion and belief,
  - f) age,
  - g) marital or civil partnership status,
  - h) working pattern preferences, such as part-time or flexible working, and
  - i) caring responsibilities.
- 7.2 Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment.
- 7.3 Where requested, this information will be removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

## **8. STAFF TRAINING AND PROMOTION AND CONDITIONS OF SERVICE**

- 8.1 Staff training needs will be identified through regular staff appraisals. All staff will be given appropriate access to training to enable them to progress within the organisation, and all promotion decisions will be made on the basis of merit.
- 8.2 Our conditions of employment, benefits and facilities are reviewed regularly to ensure that they are available to all staff who should have access to them, and that there are no unlawful obstacles to accessing them.

## **9. TERMINATION OF EMPLOYMENT**

- 9.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- 9.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

## **10. DISABILITIES AND OTHER HEALTH CONDITIONS**

- 10.1 If you have a disability or other health condition, we encourage you to tell us about your condition so that we can support you as appropriate.
- 10.2 If you experience difficulties at work because of your disability or other health condition, you may wish to contact your manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your manager may wish to consult with you and your medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs, within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution, where possible.
- 10.3 We will monitor the physical features of our premises to consider whether they might place anyone with a disability or other health condition at a substantial disadvantage. Where necessary and reasonable, we will take steps to improve access.

## **11. PART-TIME AND FIXED-TERM WORK**

- 11.1 Part-time employees or workers and fixed-term employees will be treated the same as those who are full-time or permanent. Their terms and conditions will be no less favourable (on a proportionate basis, where appropriate), unless different treatment is justified.

## **12. BREACHES OF THIS POLICY**

- 12.1 If you believe that you may have been discriminated against, you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Anti-harassment and Bullying Policy. If you are uncertain which applies or need advice on how to proceed, you should speak to your manager.
- 12.2 Allegations regarding potential breaches of this policy will be treated in confidence and investigated, as appropriate and in accordance with the relevant procedure. You will not be victimised or treated less favourably for complaining about discrimination. However, making a false allegation deliberately and in bad faith may be treated as misconduct and dealt with under our Disciplinary Procedure.
- 12.3 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

## **13. MONITORING AND REVIEW OF THE POLICY**

- 13.1 We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.

