

EQUITY, DIVERSITY & INCLUSION (EDI) POLICY

1. PURPOSE

We are committed to creating a diverse and inclusive culture, where everyone can be themselves, contribute fully and reach their potential. We will ensure equality and equity in how employees are treated, and we will design our policies, practices and decisions to be fair, transparent and free from unfair or unlawful discrimination. Our approach to EDI spans the entire employment lifecycle and all work-related activities from recruitment and onboarding to learning and development, performance, progression, pay and benefits, flexible and hybrid working, conduct at work and work-related social events.

This policy outlines our commitments, responsibilities and standards that guide how we work together across the charity. It should be read alongside our Anti-harassment, Bullying & Victimisation Policy.

Definitions of equality, equity, diversity and inclusion, and an explanation of the types of unlawful discrimination, are provided in Appendix 1.

2. SCOPE

This policy applies to all employees and does not extend to workers, contractors, consultants or any self-employed individuals working for the charity. This policy does not form part of your contract of employment and may be amended at any time.

3. PROTECTED CHARACTERISTICS

The Equality Act 2010 prohibits discrimination because of certain protected characteristics, which are:

- **Age:** This covers individuals of all ages from discrimination.
- **Disability:** This covers physical and mental impairments that have a substantial and long-term negative effect on a person's ability to do normal daily activities.
- **Gender reassignment:** This covers individuals who are proposing to undergo, are undergoing, or have undergone a process to reassign their sex.
- **Marriage and civil partnership:** This covers individuals in a marriage or civil partnership from unfair treatment in the workplace.
- **Pregnancy and maternity:** This covers women who are pregnant or on maternity leave.
- **Race:** This includes colour, nationality, ethnic origin, and national origin.
- **Religion or belief:** This covers religious and philosophical beliefs, as well as lack of belief.
- **Sex:** This covers individuals from discrimination based on gender.
- **Sexual orientation:** This covers sexual orientation, including lesbian, gay, bisexual, and heterosexual.

4. OUR COMMITMENTS

The following commitments outline our ongoing responsibilities to equity, diversity and inclusion, and enable us to meet our legal and ethical obligations as an employer and service provider:

- We will foster an inclusive culture where differences are valued, and people can bring their whole selves to work without fear.
- We will make fair, transparent and merit-based decisions, actively challenge bias and remove unnecessary barriers.
- We will provide reasonable adjustments for disabled applicants and employees and for those with other access needs, including throughout recruitment and employment.
- We will design our services, communications and digital content to be accessible and inclusive.
- We will gather and use data responsibly to identify disparities, inform action and measure impact.
- We will take all reasonable steps to prevent all forms of harassment and discrimination in the workplace, in line with our legal obligations under the Worker Protection (Amendment of Equality Act 2010) Act 2023.

5. RESPONSIBILITIES

You are responsible for treating others with dignity and respect and for contributing to an inclusive workplace. You are also encouraged to be active bystanders who challenge inappropriate behaviour when they witness it.

Line Managers have additional responsibilities to role-model inclusive behaviours, create psychologically safe teams, respond promptly to concerns and ensure fair processes and outcomes.

6. RESPECTFUL WORKPLACE AND ZERO TOLERANCE OF HARASSMENT

We do not tolerate unlawful discrimination, bullying, harassment or victimisation. Harassment includes unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment and third-party harassment are equally unacceptable.

We have a legal duty to take reasonable steps to prevent sexual harassment in the workplace, and we take this obligation seriously. We will provide clear reporting channels, including anonymous options where appropriate, and ensure swift and fair investigations with appropriate consequences for misconduct.

We will address concerns quickly and fairly through informal resolution where appropriate and through formal procedures where necessary. Further information can be found in our Anti-Harassment, Bullying & Victimisation Policy.

7. INCLUSIVE LANGUAGE AND CULTURE

We strive to create an environment where inclusive language and behaviour are the norm, and where everyone is treated with dignity and respect, by:

- Creating inclusive language in our communications and interactions.
- Respecting individuals' names and pronouns and dress codes wherever reasonably practicable.
- Supporting flexible and hybrid working, subject to the business needs and legal entitlements, and considering any requests fairly and without bias.
- Recognising and accommodating religious observance and caring responsibilities where possible.
- Fostering a culture where inappropriate 'banter' that targets protected characteristics is not tolerated.

8. INCLUSIVE RECRUITMENT AND PROGRESSION

Recruitment, promotion and selection processes will be based solely on merit, using objective criteria designed to avoid discrimination. Wherever possible, shortlisting will be undertaken by more than one person, and vacancies will be advertised widely to attract a diverse pool of applicants, with advertisements carefully worded to avoid stereotypes or discouragement of particular groups.

Applicants will not be asked questions that imply discrimination on the grounds of Protected Characteristics, including pregnancy or family plans, nor will health or disability information be sought before an offer is made, except where legally permitted (e.g. to assess the ability to perform essential duties or to arrange reasonable adjustments at interview).

Any health checks will only occur post-offer, where appropriate, and monitoring information gathered for equality purposes will not be used in selection decisions.

We will make appropriate adjustments for neurodiversity when recruiting, recognising that traditional recruitment processes may disadvantage neurodivergent candidates.

9. REASONABLE ADJUSTMENTS AND ACCESSIBILITY

We will meet our obligations to make reasonable adjustments so that disabled people and those with health conditions or other access needs are not placed at a substantial disadvantage. Adjustments may include changes to duties, hours or location, assistive technology, adapted equipment, accessible formats, quiet spaces, or adjustments to policies and procedures.

We recognise neurodiversity as a valuable aspect of workplace diversity and will make appropriate adjustments for neurodivergent employees, including those with autism, ADHD, dyslexia and other cognitive differences.

We will handle requests promptly, confidentially and collaboratively, review adjustments regularly, and record decisions appropriately.

10. PAY AND REWARD PRACTICES

We are committed to equal pay for equal work and to fair reward practices. We will review pay and progression decisions to identify and address unjustified disparities.

11. BREACH OF THIS POLICY

If, following a formal investigation, we find that you have committed, authorised or condoned an act of bullying or harassment, we will deal with the issue as a possible case of misconduct or gross misconduct. We may take disciplinary action against you, up to and including dismissal. You should be aware that any aggravating factors, such as abuse of power over a more junior colleague, will be taken into account in deciding what disciplinary action to take.

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If you feel you have suffered from any form of detrimental treatment or victimisation, please inform your Line Manager or a more senior manager as soon as possible. If we find that you have victimised anyone in this way, we will instigate disciplinary action against you up to and including dismissal.

12. DATA PROTECTION

We will process any personal data collected in accordance with our Data Protection Policy. In particular, we will record only the personal information required and keep the information only for as long as necessary.

APPENDIX 1 - DEFINITIONS

To help create a diverse and inclusive culture, it is important for you to be familiar with the following terms:

- **Equality**
Ensures everybody has an equal opportunity and is not treated differently or discriminated against because of their characteristics.
- **Equity**
Recognises that each person has different circumstances and allocates the exact resources and opportunities needed to reach an equal outcome.
- **Diversity**
Recognises, values and takes account of people's different backgrounds, knowledge, skills, and experiences, and encourages and uses those differences to create a productive and effective workforce.
- **Inclusion**
The culture in which people can come to work, feel comfortable and confident to be themselves, feel valued and be able to add value.

UNLAWFUL DISCRIMINATION

There are different types of discrimination which are covered by the Equality Act 2010. It is therefore important for you to be aware of the types of discrimination which are unlawful:

- **Direct Discrimination**
This is when someone is treated less favourably than another person because of a protected characteristic.
Example: A Line Manager is recruiting a new member for their team. Before conducting any interviews and choosing the best person for the job, they have already decided that they will not recruit a man.
- **Indirect Discrimination**
This is when a condition, rule, policy or practice applies to everyone but particularly disadvantages a group of people who share a protected characteristic without there being a justifiable business need.
Example: An employer has a policy which states reception staff aren't allowed to cover their hair. This policy applies to everyone, but particularly disadvantages practicing Muslim women who wear a headscarf in public or Jewish women who wear a wig. Unless the employer can specifically justify the policy, this is likely to be considered indirect discrimination on the grounds of religion.
- **Discrimination by Association**
This is a form of direct discrimination against someone because they are associated with one or more others who possesses a protected characteristic.
Example: A candidate has her job offer withdrawn after revealing she has a disabled child. The withdrawal of the job could be discrimination because of her association with a disabled person and the Line Manager's assumptions about how this might impact on her capability to do the job.
- **Discrimination by Perception**
This is a form of direct discrimination whereby a colleague believes that another colleague possesses a protected characteristic and discriminates against them because of that 'perceived' characteristic.
Example: A colleague is being excluded from team social activities and is the victim of inappropriate name calling because the team assume they are gay and do not 'fit' in the team culture. This could be considered discrimination by perception, regardless of whether or not the colleague is gay.

- **Harassment**

Harassment is unwanted conduct related to a Protected Characteristic that has the purpose or effect of violating someone else's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for someone.

Example: A group of black British workers encounter derogatory name calling, racist jokes and abusive language from their colleagues. The behaviour is offensive and creates an intimidating atmosphere in the workplace. This is unlawful harassment.

- **Sexual Harassment**

Sexual harassment is conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. It also encompasses less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Example: A colleague makes persistent suggestions to meet up socially after a team member has made clear that they do not welcome such suggestions.

- **Victimisation**

Victimisation occurs when someone is treated unfavourably because they have made or supported a complaint under this policy or the Equality Act 2010 or are suspected of doing so.

Example: A Line Manager excludes a team member because they think the individual supports a fellow team member's sexual harassment claim.

- **Disability Discrimination**

It is unlawful to discriminate against a person on the basis of their disability. Employees are encouraged to speak to their Line Manager, so that 'reasonable adjustments', which may include changing working hours, providing specialist equipment, or providing extra support may be considered.

Example: An employee is treated unfavourably because of something connected to their disability i.e. they may need to use assistive technology, but no adjustments are made to allow for this.

There are other types of inappropriate behaviour which do not necessarily fall under the Equality Act 2010 but will not be tolerated by the charity. For example, bullying and microaggressions.

- **Bullying**

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Example: Someone in the team is continually excluded from team social events, or malicious rumours are spread about a member of the team.

- **Microaggressions**

Microaggressions, sometimes called micro-incivilities are statements, actions, or incidents that are regarded as indirect, subtle, or unintentional discrimination against members of a marginalised group such as a racial or ethnic minority.

Example: An ethnic minority person is asked where they are from, and then questioned in detail about their parents' heritage if the initial answer is that they are British.