

# EQUALITY AND DIVERSITY POLICY

**Responsibility:** Katharine Notley

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## **Policy Statement**

### **1. Introduction**

Impact recognises that there are groups and individuals in society who are disadvantaged and discriminated against.

This policy document sets out our commitment to promoting equal opportunities both in service delivery and as an employer, by making it integral to all our strategies, policies, and practices.

We are committed to eliminating any discrimination on the grounds of the nine protected characteristics identified in the Equality Act 2010.

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy Maternity
- Race
- Religion or Belief
- Sex (formerly Gender)
- Sexual Orientation

### **2. Scope of this policy**

This Policy underpins and will inform all activities of Impact and covers our employees, associates, services to our clients, stakeholders and all those who use our services whether they are a private, statutory, voluntary or community sector organisations.

Under the Equality Act 2010, three elements of the general duty are to:

1. To eliminate unlawful discrimination, harassment, and victimisation, this is owed to everyone and covers all the nine protected characteristics listed above.
2. To advance equality of opportunity
3. To foster good relations

The intention of this Policy is to set out the equal opportunities principles and commitments that will inform all aspects of our business. The Policy also provides a framework that ensures that the company meets its public sector equalities duties, as outlined in the Equality Act 2010.

### **3. Policy Aim**

The aim of this Policy is to create:

'A company which ensures the provision of services appropriate to local need, valued by all and delivered by staff and associates who reflect the diverse communities we serve'.

This will be achieved by promoting and demonstrating fairness and equality of opportunity in:

- the provision of services
- the employment of staff
- procurement and commissioning
- achieving progress against the equality objectives and related targets.

#### **4. Provision of services**

This means:

- Fair access to services
- Fair treatment while accessing and receiving services
- Equal quality of service offered
- Fair outcomes for all clients.

As a service provider we will:

- Place our clients at the heart of policies and strategies in all our activities
- Design and deliver services that are appropriate, accessible, and effective in meeting the diverse needs of the communities in which we work. This means that in designing, planning and delivering services, we will have due regard to the need to promote and advance equality of opportunity and foster good relations between all the groups with the characteristics protected by the Equality Act 2010
- Engage with and listen to all sections of the community in identifying needs and in decisions on the way services are designed, planned, and delivered
- Provide timely and relevant resources and information about services clearly and in a variety of appropriate formats and languages to ensure it is accessible to all sections of the community
- Use effective systems such as monitoring, performance reviews, and community engagement to challenge our service delivery to ensure that quality and equality are continuously evaluated and improved and to ensure that all sections of the community are receiving fair access and outcomes
- Monitor and evaluate service up-take in relation to all groups with the protected characteristics
- Ensure that those representing the company understand what equality in service provision means and apply it in their respective roles
- Through our customer complaint procedure, provide facilities and opportunities for clients to make a complaint if they are dissatisfied with a service they have received or the way they were treated when accessing a service.
- When contracting out or commissioning a service, we will make sure that: Any services provided to local people by a third party on behalf of Impact meets the requirements of the Equality Act 2010

- Our procurement policies, systems and processes are informed by the need to use procurement as a strategic tool for furthering our equal opportunities aims.
- Our selection and tendering processes specifically address and include equality considerations and those involved are trained in relevant equalities issues in procurement.

## **5. Employment of Staff and Associates**

This means:

- Fair access to jobs
- Fair treatment in employment
- Fair access to training and development opportunities

The right:

- Not to be discriminated against, harassed, victimised, or bullied
- To make a complaint when they feel they have been unfairly treated, harassed, or bullied and to have their complaints acted upon
- To challenge and bring discriminatory acts and behaviour to the attention of an appropriate person for action
- To be respected and valued for who they are and for what they contribute
- Not to discriminate, harass, victimise, or bully another employee.
- To respect other employees and value them for who they are and for what they contribute to the company.

Impact's aim is to ensure equality of opportunity in all aspects of the employment cycle including recruitment, appraisal, training, promotion, redeployment, redundancy, and retirement processes.

The company will seek to promote equality of opportunity in employment by ensuring that:

- Everyone receives equality of treatment in recruitment and employment
- Positive action measures are taken to reduce the effects of discrimination and disadvantage.
- All associates and employees are aware of the Equal Opportunities Policy and that they are aware of their rights and responsibilities in relation to its implementation and the consequences of unacceptable behaviour.
- Managers, associates, and employees will be made aware of their responsibilities to further the mainstreaming of equalities in the context of their actual job.
- The development and implementation of policies to tackle any discrimination & harassment; and to ensure procedures cover all equalities areas.
- We investigate thoroughly and promptly allegations of discrimination, victimisation, or harassment.

- Acts of discrimination, victimisation or harassment by employees will be treated as serious disciplinary offences.
- We keep under review and will ensure that our recruitment and selection procedures accord with the codes of practice produced by the Government and the Equality and Human Rights Commission.
- We continue to undertake and develop regular age, disabilities, ethnic and gender monitoring of the workforce profile. Where staff are happy to provide further equalities information, we will consider ways to monitor it.
- We develop equal opportunities monitoring across the employment cycle covering in time application, appointment, appraisal, training, progression, redeployment, redundancy, secondment, disciplinary and employee discrimination and harassment complaints and exit interviews.
- We ensure accessible workplaces for all employees, making reasonable adjustments to facilitate disabled people to be able to work, and remain in employment, wherever possible, and for existing employees who become disabled.
- We retain flexible working practices to ensure that staff are supported in balancing work and other life commitments.

## **5a. Impact Dress code statement**

Impact does not have a formal dress code policy. We would not look to impose a dress code with which people of a particular religion cannot comply. There are a few general statements, however, that we would expect our employees and Business Associates to comply to:

- It is expected that Impact employees/associates will apply a common sense approach to the dress code and dress in an appropriate smart/casual manner.
- It would be expected that, on occasions when employees/associates are meeting with external visitors from other organisations, or interviewing candidates, that they would dress in an appropriate conventional business-like manner.
- Employees/associates must abide by the safety policies and procedures and wear required protective clothing and safety equipment should they be visiting work placements which require such.

## **6. Procurement**

We will ensure that the people we do business with are aware of and compliant with all relevant equal opportunities legislation currently in force.

We will promote equality through procurement and commissioning systems and processes that are:

- Fair
- Accessible to all

- Transparent and consistent with our public sector equality duty

In addition, all contractors are expected to sign our Business Associates Charter relating to the terms and conditions of employment and conduct and they will also have access to our equality and diversity induction programme.

## **7. Achieving Progress Against Equality Objectives and Related Targets**

Equality monitoring enables us to see how our policies and activities are affecting various sections of our communities. We will work towards the aims of this Policy through the delivery of a set of equality objectives.

The objectives reflect our commitment to promoting an accessible and inclusive service.

The key objectives are based around addressing any inequality in the:

- Provision of consultancy, mentoring and training services
- Employment of staff
- Procurement and commissioning processes

Our Equality action plan will detail how the equality objectives will be delivered and they will be monitored by the Equality and Diversity Board. We will review and report annually on our progress and performance and invite our clients and stakeholders to comment on how well we are doing.

## **8. Fostering Good Relations**

Impact aims to foster good relations in the local community to ensure that individuals and those who represent them feel they have equal access to our services and meet their needs to improve their lives and businesses.

We recognise the importance of forming partnerships to initiate and support structures and projects that promote understanding and enable people to build social relationships outside their own immediate ethnic or cultural communities.

We will recognise and take account of all the nine protected characteristics to whom the good relations duty is owed under the Equality Act 2010. and where reasonable actively promote our services through the medium of Welsh.

## **9. Training, Supporting and Developing Staff and Associates**

Impact believes that development and training for all those directly involved in the provision and management of our services represents a vital part of the implementation of its Equal Opportunities Policy. This should include development specifically directed at enabling the advancement in employment groups who are underrepresented.

The company will:

- Provide induction training that embraces all equalities issues.

- Use training and induction to equip staff and associates in understanding their role regarding equal opportunities and help them to deliver the aim of the policy as part of their role.
- Put in place training programmes that include addressing equality objectives through the Business Planning and Performance Management processes.
- Ensure that development and training programmes delivered by or on behalf of the company supports and adds value to the aims of this Policy and embeds equalities in its content.
- Seek employees' views on their development and training needs in developing training priorities and programmes.
- Ensure management training will continue to include equal opportunities as an integral part of service management.

## **10. Equalities monitoring: Data Collection and Analysis**

Equality monitoring helps us to see how our policies and activities are affecting various sections of our communities.

The Public Sector Equality Duty does not expressly require us to collect equality information. However, collecting, analysing, and using the information helps us to see how our policies and activities are affecting various sections of our communities. In employment and service provision, it helps us to identify any existing inequalities and where new inequalities may be developing and take action to tackle them.

Our approach to equalities monitoring will be strategic and flexible and we will direct our efforts to those areas and activities where the information obtained will be useful in helping to improve outcomes for our clients.

Impact has a standard equality monitoring form which covers all the nine protected characteristics in the Equality Act 2010. To reflect the local character and full diversity of our community, the form includes the categories of language and refugee and asylum seekers. When necessary, we will adapt the form to help us to collect the information that will enable us to make the improvements needed to achieve the equality outcomes that we are seeking.

Our standard Equal Opportunities Monitoring Form is set out in **Appendix C** of this document.

## **11. Accountabilities: roles and responsibilities**

As a Business Support provider, we have a duty and role in promoting equal opportunities by:

- Acting as a model of good practice
- Influencing the wider community, external organisations, clients, and partners



All employees and associates with Impact have a responsibility to help the company to meet its equalities obligations. Each should ensure that in their respective roles they have due regards to equal opportunities as set out in this document.

It will be the Directors responsibility to provide overall strategic direction and control of this Policy and produce regular reports as required. **Projects Director Katharine Notley** has overall responsibility for implementation, monitoring and review of the Policy and for the relevant plans and performance management practices.

### **12. Implementation and Review**

The equality objectives form the Delivery Plan for this Policy and details can be found in **Appendix B**.

Actions to deliver the equality objectives are included in our key strategies. We have set targets based on relevant performance measures which will be monitored by the Diversity Equality Board and included in our performance reports.

We will review the delivery plan annually and update the objectives to reflect new and emerging issues. We will review and report on our performance annually and invite our clients to comment on how well we are doing.

### **13. Breaches of the policy**

The Company will take disciplinary action against employees within agreed procedures where the Policy is being abused, ignored, or breached.

The company has developed procedures which enable clients, candidates for jobs and employees to make complaints if they believe they have been unfairly treated.

Employees will also be entitled to expect that unacceptable behaviour including harassment by others will be dealt with promptly.

Signed: .....

Date: .....

**David Notley**  
**Managing Director**

**Issue Date: October 2018**

**Review date: October 2019**

## Appendix A

### Legal Framework

The Equality Act 2010, whose main provisions came into force in April 2010, and its allied General and Specific Duties together provide the legal context for this Policy.

The Act brings together the provisions of previous equal rights legislation into a single legal framework and creates a single Equality Duty. It introduces the term “protected characteristics” to describe the groups to whom it gives protection.

They include persons who share the characteristics of:

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation
- Marriage or civil partnership

### The Act’s General Duty – the single equality duty

Section 149 of the Act sets out a general duty which requires a public body to “have due regard to the need to:

1. eliminate discrimination, harassment, and victimisation
2. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”

The Act defines “due regard” as taking steps to:

- Remove or minimise disadvantage suffered by persons who share a protected characteristic
- Meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share that characteristic
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Tackle prejudice
- Promote understanding between groups in society.

### Specific duties

To support better performance of the general duty, government has imposed several specific duties on public authorities.

These require public sector organisations to:

1. Publish annually, equality data relating to the workforce. This should include:
  - the gender pay gap
  - the race, disability, gender, age breakdown of the workforce
  - data on religion and belief and sexuality where this is available
2. Set and publish equality objectives that are evidence based and are “specific, relevant and above all measurable”. The document should set out in full the evidence on which those objectives have been chosen in preference to other possible objectives. Equality objectives setting should be part of the normal business planning process.
3. Publish annually, performance data on how effectively the organisation is achieving the aims of the S149 duty i.e. to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations. The aim is to enable comparison between present and past performance and to track progress on specific equality issues.
4. Be transparent on outcomes of engagement, impact assessments and equalities monitoring.
5. Publish data in a way that is open and freely available and accessible to third parties such as community groups and equality campaigners who will be free to re-use the data.

Part 5 of the Act deals with employment and treatment at the workplace and covers all the nine characteristics. It prohibits discrimination in deciding whom to employ; in terms of employment and in opportunities for advancement and training while in employment; victimisation and harassment.

In addition to the Equality Act 2010 and its allied specific duties, this Policy has also been informed by several Government reports on equal opportunity.

## Appendix B

### Corporate Objectives

#### Implementing the provisions of the Equality Act 2010

We will implement those provisions of the Equality Act 2010 and Public Sector Duty that have relevance to Impact and to our clients and stakeholders. Specifically, we will:

- Update our relevant policies, systems, and procedures considering the Act and its related public sector equality duties.
- Work in partnership with key stakeholders to develop and deliver our equality objectives every four years from April 2013.
- The objectives will be published as part of the business plan and will be signposted as part of the equality pages of the website. The objectives will be presented clearly, and in a way that the public will understand. Impact will consider publishing them in alternative accessible formats and in different languages, where proportionate and appropriate, and where requested to do so.
- Produce an annual progress report, to be available on our website, setting out how we are performing on those equality objectives.
- Review and report annual equality data covering the proportion of staff and clients from ethnic minorities, disabled employees, and women at every level of the workforce. Where they exist, workforce data on religion and belief, and sexuality will also be published, although in line with this specific duty and being sensitive to the known wishes of individuals.
- Undertake Equality Impact Assessment of all our major policies/strategies and all proposals for major changes in structures and service delivery models to ensure that they do not disproportionately have a negative impact on any sections of our community.
- Consult and engage to ensure that all our people have a say in how services are developed and delivered and are involved in key decisions that affect their lives and their local areas.
- Ensure access to information to ensure that no one is placed at a disadvantage in terms of access to the information they need due to a language barrier or a disability.
- Carry out an annual business planning process, through which our equality objectives will be implemented, monitored, and managed through our performance management framework.
- Support and participate in events and local area-based activities to promote bridging and positive social interaction between different communities and groups.
- Ensure our recruitment and employment related policies are fair, transparent, and supported by procedures that all staff and applicants have confidence in.

- Undertake procurement, commissioning and partnership arrangements that ensure that the “due regard” duty to promote equality is incorporated into the terms and conditions of all contracts and partnership arrangements and where appropriate, ensure that criteria specific to particular protected groups are reflected and given due weight in contract specifications and award criteria.
- Ensure policies on discrimination, harassment and victimisation in the workforce supported by an effective Grievance Procedure that staff have confidence in to deal with complaints are communicated and implemented.

**Appendix C.  
Equality and Diversity Monitoring Form**

**Impact Innovation & Growth Services Ltd Monitoring Form**

**Impact Innovation & Growth Services Ltd aims to offer equality of opportunity in accessing start up support. No client should receive less favourable treatment on the grounds of race, ethnicity, gender, sexual orientation, age, marital status, disability or religion and belief. The following data will be used to monitor our service delivery, job candidates, associates, and employees.**

**Gender: \*(please tick)**

Male	<input type="checkbox"/>	Female	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>
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**Date of Birth:** \_\_\_\_\_

**OR**

**Age Category**

15-24	<input type="checkbox"/>	25-30	<input type="checkbox"/>	31-50	<input type="checkbox"/>	51-54	<input type="checkbox"/>
55-64	<input type="checkbox"/>	65+	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>		<input type="checkbox"/>

**What is your preferred language?**

Welsh	<input type="checkbox"/>	English	<input type="checkbox"/>	Other (please state)	<input type="checkbox"/>
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**What is your current Employment Status?**

Self Employed (Indicate hours per week)	<input type="checkbox"/>
Employed (Indicate hours per week)	<input type="checkbox"/>
Unemployed (Indicate number of months)	<input type="checkbox"/>
Economically inactive (Indicate number of months but exclude education)	<input type="checkbox"/>
In full time education / training	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>

**Please tick the following to indicate your Welsh Language skills**

I can understand spoken Welsh	<input type="checkbox"/>
I can read Welsh	<input type="checkbox"/>
I can speak Welsh	<input type="checkbox"/>
I can write Welsh	<input type="checkbox"/>

**Please tick any of the following that apply to you**

I consider myself to have a disability	<input type="checkbox"/>
I am a lone parent	<input type="checkbox"/>

I have a work limiting disability	
I am a migrant worker	
I am a refugee	

**Ethnicity**

**White**

British		Welsh		English	
Scottish		Irish		Other	

**Black**

British		Welsh		English	
Scottish		Irish		Caribbean	
African		Other			

**Asian**

British		Welsh		English	
Irish		Indian		Pakistani	
Bangladeshi		Chinese		Other	

**Dual Heritage**

White and Black Caribbean		White and Black Asian	
White and Black African			

**Other** (please specify) \_\_\_\_\_

Do you consider yourself to be a gypsy / traveller / Romany	
If you would prefer not to provide details of your ethnic background, please tick box	

**Graduate**

Post Graduate? (within the last 5 years)	
Undergraduate?	

Are you part of the New Enterprise Allowance Scheme? \_\_\_\_\_

Are you an ex member of the Armed Forces? \_\_\_\_\_

If you require this document in an alternative format, please discuss your requirements with us.

Please return this form to:

Impact Innovation and Growth Services Ltd  
76 Excalibur House, Priory Drive, Langstone Business Park  
Newport, NP18 2HJ

[k.notley@impact-innovation.co.uk](mailto:k.notley@impact-innovation.co.uk)