

## Diversity and Equal Opportunities Policy

### Introduction

This policy aims to outline Pollenn Community Interest Company's commitment to ensuring equality of opportunity and equal treatment for staff, workers, and customers in terms of employment and access to services; and to provide guidance on anti-discriminatory practice. This policy is non-contractual.

### Scope

The policy applies to employees directly employed by Pollenn Community Interest Company to workers employed via agencies, contractors in terms of employment, volunteers in relation to their recruitment, training and support and customers in terms of service provision. The policy applies specifically to discrimination and equality of opportunity in respect of 'protected characteristics' as defined in the Equalities Act 2010:

- (a) Age
- (b) Disability
- (c) Race
- (d) Sex
- (e) Religion or cultural beliefs
- (f) Gender reassignment
- (g) Marital status and civil partnership
- (h) Sexual orientation
- (i) Pregnancy and maternity
- (j) obesity

The policy applies across the range of employment policies and practice, including those relating to Discipline, Grievance, Harassment and Complaints.

### Responsibilities

Pollenn CIC values its staff, contractors, workers, customers and volunteers, and expects them to be treated in a respectful manner. Accordingly, all have a responsibility to treat others with dignity and respect. The Board of Directors are responsible for providing advice and guidance on equality and diversity issues. The board of directors will ensure the Policy document is kept up to date.

### Aims

Pollenn CIC will provide equality of opportunity and equal treatment as an integral part of good practice. The organisation is committed to a working environment in which the contribution and needs of everyone are fully valued and recognised. We will support our staff, workers, volunteers and contractors in not tolerating any inappropriate, violent or abusive behaviour from colleagues, other organisations or customers.

**General purpose**

Pollenn CIC's practices will ensure that staff, workers, volunteers, and customers will not be discriminated against on any grounds including age, disability, race, sex, religion or cultural beliefs, gender reassignment, marital status and civil partnership, sexual orientation, pregnancy and maternity. Pollenn CIC's commitment to anti-discriminatory practice relates to all kinds of discrimination, as set out below:

- Direct discrimination - where someone is treated less favourably than another because they have a protected characteristic
- Indirect discrimination – when a requirement or a condition is applied which has a detrimental effect on a particular group or individual. This applies even if there was not a deliberate intention to discriminate.
- Associative discrimination – direct discrimination against someone because they associate with another person who has a protected characteristic.
- Perceptive discrimination - direct discrimination against someone because others think they have a protected characteristic even if they do not possess that characteristic.
- Harassment – unwanted conduct related to a protected characteristic which violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them. This applies even if the conduct is not directed at the individual or if they do not have the protected characteristic.
- Third party harassment – potential liability for the harassment of staff by others such as clients or customers.
- Victimisation – when someone is treated badly because they have made or supported a complaint under the Equalities Act or it is thought that they have done so.

**Employment Practices**

Pollenn CIC aims to promote equality and diversity as an employer and to ensure that no job applicant or employee receives less favourable treatment or is disadvantaged by conditions or requirements that cannot be shown to be justifiable in the context of the policy. Selection, recruitment, training, promotion and employment practices will be subject to regular review to ensure that they comply with the Diversity and Equalities Policy. All training opportunities will be published widely to all appropriate employees and not in such a way so as to exclude particular groups. Pollenn CIC regards discrimination, abuse, harassment, victimisation or bullying of staff, customers or others in the course of work as disciplinary offences that could be regarded as gross misconduct.

**Pollenn Community Interest Company as Service Provider**

In developing its services, Pollenn CIC will seek to ensure access to its customers, this will include, wherever practicable, making specific access arrangements for its service users with disabilities or learning difficulties, or any other protected characteristic which may apply, such as religion and belief. Pollenn CIC will attempt to ensure that none of its policies discriminate directly or indirectly against any group or individual.

**Data Collection**

Pollenn CIC complies with the requirement of the Data Protection Act. Any data, either qualitative and or quantitative, required in order to monitor the requirements or the impact of the Equalities Act 2010, will be collected where it is reasonable, proportionate and practical to do so. Any such requirements will be notified to Pollenn's customers and will follow a common data format.

This policy will be reviewed on an on-going basis and amended in line with new developments in Equality and Diversity best practice.

**Legislation**

We will take all reasonable steps to ensure that we and our staff do not unlawfully discriminate under:

- (j) the Rehabilitation of Offenders Act 1974;
- (k) the Employment Rights Act 1996;
- (l) the Human Rights Act 1998;
- (m) the Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000;
- (n) the Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002;
- (o) the Civil Partnership Act 2004
- (p) the Work and Families Act 2006;
- (q) the Equality Act 2010;
- (r) Race Relations act 1976;
- (s) Disability Equality Duty
- (t) Gender Equality Duty
- (u) Racial equality code of practice for employment
- (v) Sex discrimination act 1975
- (w) Equal Pay act 1970
- (x) Disability Discrimination Act (DDA) 1995 and;
- (y) any other relevant legislation in force from time to time relating to discrimination in employment and the provision of goods, facilities or services.

**Equal Opportunities Policy Implementation:**

- i) Pollenn CIC is committed to promotion of equal opportunities in all aspects of our work including management, employment practices with both paid workers and volunteers, access to services and service provision.
- ii) The Board of Directors shall ensure that it (Pollenn CIC) acts in such a way that no individual or group referred to in this policy is discriminated against, in particular:
  - by providing information in a way that is accessible, for example, large print, community languages etc.;

- by meeting in premises with facilities which are physically accessible to those participating;
- by making training in discrimination awareness and equal opportunities available to all members of the Board, paid workers and volunteers.

iii) The recruitment of paid workers and volunteers shall be undertaken in accordance with this policy, in particular:

- by preparing job descriptions which clearly set out what the worker is to do, and person specifications which recognise that relevant experience can be as valuable as qualifications or previous paid employment;
- by ensuring that in all selection procedures only factors relevant to the requirements of the post are taken into account, and that the spirit of the policy statement is adhered to;
- a copy of this policy is provided to all new members of staff.

iv) The employment of paid workers and volunteers shall be undertaken in accordance with this policy, in particular:

- by providing training relevant to the needs of staff and designed to enable them to carry out their jobs;
- by ensuring that any staff member who, in the course of their work, displays attitudes contrary to this policy to any person whether by word, behaviour or other manner shall be liable to disciplinary action;
- by recognising and responding to the individual needs of staff, especially those who are carers or who have disabilities, and ensuring that, within available resources, the necessary support is provided to enable them to work effectively.

### **Stakeholder/Service User Needs**

In every aspect of the planning, management, access, provision and monitoring of services, the Board and staff shall seek to promote equality of opportunity in accordance with this policy, in particular:

- by seeking to identify and respond to the needs of those groups experiencing discrimination, altering priorities and methods of service delivery where necessary;
- by seeking the views of client's through an annual stakeholder/service user Feedback Questionnaire where funded to do so;
- by liaison and consultation with relevant groups and by regular analysis of the user profiles, to monitor the extent to which services are being taken up by groups experiencing discrimination.

### **Dealing with third parties**

Pollenn CIC will not unlawfully discriminate in dealings with third parties.

### **Training**

The appropriate Director or Project Manager will ensure that all new employees and volunteers will receive induction on the policy.

### **Review**

The Board shall regularly monitor and evaluate the effectiveness of this policy in achieving the stated

aims. This process shall be undertaken at least annually, shall include the review of each component of the policy, and shall aim to seek the views of organisations representing the interests of those groups referred to in this policy.

### **Complaints and Sanctions**

Pollenn CIC will treat seriously any complaints of unlawful discrimination on any of the stated grounds made by employees, volunteers, clients or other third parties and will take action where appropriate.

All complaints made by external parties will be investigated in accordance with Pollenn's Complaints Procedure and the complainant will be informed of the outcome.

In the event of an investigation concerning a complaint against an employee, Pollenn's Grievance Policy and Procedures will be followed and any action necessary dealt with under Pollenn's Disciplinary Procedure.

Complaints will be monitored annually and any outcomes/action recorded.

### **This is the current copy of this policy (September 2015)**

This policy will be reviewed by The Board of Directors September 2016