

Steps to Recovery

Support for Community Champions

Guidelines to developing your own Equality, Diversity & Inclusion Policy

Since October 2010, it has been a legal requirement for organisations in the UK to have an Equality, Diversity & Inclusion (ED&I) Policy. We've created this document to help you to develop your organisation's Equality, Diversity & Inclusion Policy.

What is an ED&I policy?

An ED&I policy demonstrates actions that your organisation will take to address any grievance and complaints that may arise in breach of the Equality Act 2010 (read more about this in the box below!)

It is possible to adopt a generic ED&I policy, but by developing one that is specific to your organisation, you will demonstrate to potential funders how your organisation has transposed ED&I law into the aims, mission, objectives, and general activities of your organisation.

The Equality Act (2010)

The Act intends to protect individuals from all forms of direct and indirect discrimination, victimisation, harassment, and general unjust treatment (including treatments in relation to pregnancy, maternity/and or paternity), marital status, and on the basis of particular protected characteristics including age, disability, race, sexual orientation, gender/and gender reassignment. All of the characteristics protected by this legislation are deemed to be 'protected characteristics' and it is illegal to discriminate against all staff and service users on these grounds.



How to develop a ED&I policy

Drawing up a meaningful policy can seem like a daunting task. To make it more manageable, we have broken it down into a few key steps and we provide this template to help you.

We recommend that you put together your ED&I policy collaboratively with multiple members of your workforce. An ED&I policy should not be the responsibility of one person within your organisation. If the people carrying out the policy are involved in the process of drawing it up, they will be better champions of the policy once it is live. The policy will also be more robust if it has the input of service users.

It is also important that you consider and put systems in place to mitigate 'blind sighted' or not immediately apparent, forms of discrimination. If you have staff or service users with physical disabilities, please ensure that you consider how this ED&I policy will affect them directly or indirectly.

Step 1:

As you start out on your ED&I policy, begin by reflecting on the following thinking points. This will put you in good stead for filling in our policy template in **the next section**.

What are your organisational goals and how could being diverse and inclusive contribute to them?

Perhaps ED&I is an inherent part of your organisation's aims... If you are working with service-users who experience discrimination, it is particularly important that you have actions to mitigate these within your organisation.

As it currently stands, are staff and or service users being treated fairly?

How **should** staff and service users be treated? Consider people's disability, sexuality, religion/beliefs, ethnic groups, etc.

How does inequality, lack of diversity and exclusion manifest itself in the context of the particular group you are working with?

For example, if you are working with 13-16 year olds, keeping track of what is happening online is likely to be one of the key things to look out for in this age group.

If you have capacity, can you employ someone to implement ED&I strategies?

How do you **celebrate** diversity?
For example, you may mark religious festivals and Independence Days.

How does your organisation **practically** encourage diversity and inclusion?

For example, what do you do to ensure that your communications are accessible for everyone? For example, using visual images, sharing information in story format, translating content into other languages, etc.

Are staff and volunteers **aware** of your organisation's ED&I policy?

What do you think they would say about it? Do they understand? Would they benefit from awareness raising or training?

If you work with vulnerable groups, how can **they** be made aware of your organisation's commitment to ED&I?

What does your **staff** and **volunteers** team and **trustee board** look like? Is it a reflection of a diverse society?

Make a note of your thoughts

Having reflected on these questions, you will be in good stead to start defining the **aims of your ED&I policy** - what is your organisation's commitment to ED&I? Jot down your initial ideas:

Step 2:

After you have thought about these initial thinking points, you might want to think more deeply about how diversity and inclusion principles translate into a **code of conduct** and how they can be brought to life by **day-to-day operations**:

How are staff **expected** to **behave** to embody the organisation's commitment to equality, diversity, and inclusion?

Is there a different focus for **people working in different roles**?

What can your organisation do to ensure that **staff** and **service users** feel **valued** and **respected**? What do you do already?

What can you do to encourage your **service-users** to comply with ED&I principles?

For example: Celebrating all the different beliefs and related festivals of our staff and service-users

What is your stance of bullying and how do you demonstrate this to your staff and service users?

What is the consequence for if someone in your organisation breaches the ED&I code of conduct? Is it the measure sufficiently **punitive**? Is it also **constructive**?

What is your organisation's approach to the use of offensive/derogatory language – is it prohibited?

Could you offer staff training to ensure that they abide by the organisations equality, diversity, and inclusion policy?

Make a note of your ideas so far

Answers to these questions are essentially the building blocks of your policy itself. For each policy item, consider who will be responsible for its implementation. Jot down your initial ideas:

Step 3:

ED&I starts at home. Therefore, your ED&I policy needs to particularly attend to **recruitment processes and HR policies** (of staff, contractors and volunteers). How will you promote and practice equality, diversity and inclusion within your own team?

Some commonly used ideas are:

Collect equality and diversity data as part of your recruitment process (including volunteers)

Give ED&I briefings or trainings to HR decision-makers

Implement appropriate procedure for decision-making around staff promotion, e.g. devise ED&I friendly criteria.

Take steps to ensure all staff have equal opportunities to access training and to progress.

Commit to regularly reviewing HR procedures. Develop a disciplinary process/procedure for discrimination, and make staff aware of it.

Ensuring services are **accessible** for all (regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and/or belief, sex or sexual orientation) is also key to ED&I. Some factors to consider are:

If you work from a premises, or run a centre for service-users, is it **physically accessible** to wheelchair users?

Do you have resources/equipment (such as a PA system) to support those with hearing impairment?

How can **staff be supported** to promote ED&I?

What can staff and volunteers do to make your organisation feel **welcoming** to all ethnicities, genders, sexualities or ages?

Are there **particular groups most at risk of exclusion** from your services and how can access be more equitable for

Make a note of your ideas so far

Jot down your initial ideas here:

Step 4:

Lastly, you will need to have a protocol for dealing with **discrimination complaints**.

By developing answers to the following questions, you will be able to formulate a complaints procedure:

Who is the first port of call for reporting complaints?
How do complainants make their statement - written or verbal?
How are you making staff, volunteers, contractors and service-users aware of who to report complaints to and how?
What criteria determines the severity of the situation?
How is a complaint escalated to senior management and/ or legal counsel?
What level of severity requires a) disciplinary action b) termination c) criminal liability?
Who makes the final decision about a complaint?
Does your organisation have within its management committee people to oversee staff and client user's welfare? This is an opportunity to state that it is a priority of your organisation.
How will you keep a record of incidents? You could use a centralised spreadsheet, portal or case management system.

Make a note of your ideas so far

You will need to consider how this complaints procedure varies for **staff** and **service-user** complainants. In the table below, you can start jotting down ideas about 'steps' for your complaints procedure for each:

For staff (including volunteers and contractors)	For service-users

Step 5:

Organisations also need to show **commitment** to their equality and diversity policy. This will help instil organisational and cultural change and improvement.

Who is involved in formulating this policy – staff, service- users, senior management, and trustees?

Jot down your answer here

Does this policy have the support of senior management and your trustee board?

Jot down your answer here

How often will this policy be reviewed?

Jot down your answer here

Is the policy accessible to all?

Jot down your answer here

You can provide answers to these four questions as statements at the end of your policy.

Your ED&I policy template

Now that you have considered Steps 1 to 5, it is time to put it all together and begin to formulate your ED&I policy. We have devised a template so you can easily translate your answers from the five thought exercises into a written policy.

In the template, there are seven **subheadings**. Under each one, we have provided some *ideas for the type of thing you may write*. You can lift the text, fill the gaps which we have *highlighted in pink*, and adapt it to fit your organisation.

Structure

1. Policy statement
2. Scope
3. Commitments
4. Accessibility Policies
5. Recruitment HR Policies
6. Discrimination Complaints Procedures
7. Date of next review

1. Policy statement

[Insert organisation name here]'s mission is to _____.
We recognise equality, diversity, promoting a culture of inclusion, and listening to the voices of people with lived experience is vital to our success. This policy reflects our commitment to ED&I and provides a programme of activity for progressing our equality aims.

These aims are:

- For our staff to reflect the diversity of the communities that we support and work with. _____
- To be an organisation where those working with us, whether they are staff or beneficiaries, feel like they can thrive and reach their full potential, no matter their background. _____
- To ensure that ED&I is embedded in all of our activities, policies and decisions and that diversity is celebrated. _____
- To make all existing personnel and beneficiaries aware of our organisational commitment to ED&I. _____

We have given you some generic aims highlighted in blue. You can adapt the text to more closely reflect your organisation and what you came up with in Step 1.

2. Scope

This policy applies to all personnel working at *[Insert organisation name here]* on a paid or voluntary basis, including consultants, and visitors or contractors who visit our premises.

It covers discrimination on the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and/or belief, sex or sexual orientation as set out in the Equality Act (2010).

ED&I policies do not tend to vary significantly in their scope, so you shouldn't need to edit the text in this section except to insert your organisation's name..

3. Organisational Commitments

Promoting equality and diversity is at the heart of our organisation and sets our values and goals. We will take active steps to fulfil our responsibilities and promote good practice by:

- Making sure all reasonable adjustments are made, to make our organisation accessible and welcoming to disabled people and people of all ethnic backgrounds, gender and sexual orientation, whether as staff or as service-users.
- Ensuring that all staff, volunteers, and job applicants are given equal opportunity, and actively seeking to ensure that our staff team and trustee board reflect the diversity in our society and our service users.
- Creating a supportive and inclusive culture amongst our entire community, which also includes our staff, contractors, partners, volunteers, and service users. This includes making all staff, trustee and service-users aware of this policy and their role in it, and giving them the tools to raise concerns about discrimination and ED&I.
- Communicating our commitment to ED&I to all personnel and service-users. Dealing with potential and actual acts of discrimination, harassment and bullying using organisation procedure and taking appropriate action where necessary

The examples highlighted in blue are some generic organisational commitments. You can adapt the text to more closely reflect your organisation and to incorporate your specific policy ideas that came out in your brainstorming during Steps 1-2.

4. Responsibilities

All individuals in the organisation (trustees, members of staff, and service-users) have a responsibility to promote ED&I.

Staff have a responsibility to ensure the relevant procedures are followed and to support service-users to follow relevant procedures.

Volunteers and contractors are required to comply with ED&I policy.

Here are some standard statements about who is responsible for ED&I. You may wish to add greater detail based on your answers to Step 2.

5. Policy – Recruitment and Human Resources (HR)

To support our commitment to the ED&I process we are committed to the following Recruitment and HR procedures:

- Gathering equality and diversity data from applicants is an integral part of our recruitment process. We review this at the close of deadlines to evaluate the types of applicants we attract for advertised roles, and we feed this back to our board of trustees. This is solely the responsibility of our HR and Management Team
- We employ a blind recruitment process for the shortlisting of all candidates and use an ED&I-friendly criteria
- We provide staff with a ED&I induction training. Staff are required to sign a document stating that they understand and commit to abiding to ED&I principles.

These examples highlighted in blue are some ideas. You can adapt the text to more closely reflect your organisation and the ideas that came out in Steps 2-3.

We are committed to reviewing our Recruitment and HR policies regularly to ensure they are effectively promoting ED&I.

6. Policy – Accessibility

We are committed to ensuring our diverse staff and user-base can access our physical space and resources. We will take active steps to do this by:

- We ensure the premises where our community activities take place are accessible to wheelchair users, and we have installed PA Systems to support those with hearing impairment.
- We make marginalised groups well-aware of their rights to access our services, We mention our commitment to ED&I in all our outreach initiatives.
- At our centre, we display images of all prohibited forms of discrimination. The captions are also translated into the main languages of our service users, with information on how to make a report and an indication of the punitive measures we will take if ED&I principles are breached.
- We provide interpreters for non-English speakers at all major events, and provide large prints of documents.
- We procure IT systems so they have in-built speech to text software to support staff and service users with specific learning disabilities.

These examples highlighted in blue are some ideas. You can adapt the text to more closely reflect your organisation and the ideas that came out in Steps 2–3.

We are committed to reviewing our Accessibility policies regularly to ensure they are effectively promoting ED&I.

7. Complaints procedures related to Equality, Diversity and Inclusion

The following procedure will be followed for dealing with discrimination complaints from staff and volunteers – this was last reviewed [date the procedure was last reviewed].

- When making a complaint, normally the matter should be raised with the Director, who will log the incident, and work with the complainant (and involved parties) to resolve the issue.
- The first resort is to resolve the complaint informally; however there is a formal process if this is not possible.
- To make a formal complaint, the complainant must write a letter/ email – outlining what happened and any evidence of the incident. For those lacking language skills can receive support to produce a written statement from an interpreter.
- This will be investigated within the organisation. An accidental breach of ED&I that has not caused severe harm will result in training for the perpetrator. An intentional or malicious breach of ED&I will result in disciplinary action or termination, depending on the severity. This final decision will rest with the Director. Decisions around whether to notify the police will be taken by the board of Trustees, if the complaint is grave.
- A malicious or unfounded complaint will be investigated and dealt with the Director.

These examples highlighted in blue are some ideas. You can adapt the text to more closely reflect your organisation and the ideas that came out in Step 4.

8. Commitment to the policy

This policy was formulated in consultation with staff, service- users, senior management, and trustees.

The final version has been given the support of senior management and your trustee board, as well as positively reviewed by a small group of service-users.

The policy will be reviewed every six months and is easily accessible on our website.

This policy was reviewed in [insert month and year the policy was created]. The next review will be in [insert month and year the policy will next be reviewed]

These statements have been generated by imagined answers to the four questions posed in Step 5. If you wish to add more detail (or omit it) based on your organisation, you can do so.