



“Creating sustainability by imbuing independence and strength into community organisations; supporting effective and efficient services.”

## Diversity, Equality and Inclusion Policy & Implementation Plan 2021

Impactful Governance - Community Interest Company actively encourages equal treatment, diversity and inclusion processes within our recruitment, workforce and customers, challenging discrimination and making adjustments where possible.

We are a Disability Confident Committed Employer and accredited by the Department of Work & Pensions at level 2, working towards Disability Leaders level 3.



We are LGBT+ led and members of the Gay Professional Network; actively including all members of society, involving the LGBTQI+ community which supports interactions with other LGBT+ organisations.



The aim is for our workforce to be inclusive in working practices, of all sections of society and for each employee and client to feel respected.

The organisation is also committed against unlawful discrimination.

### **The policy's purpose is to:**

- Provide equality, fairness and respect for all in our employment or volunteering whether temporary, part-time or full-time.
- Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation.
- Oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

### **The organisation commits to:**

- Encourage equality, diversity and inclusive thinking into the workplace or work environment as good practice and make social, ethical and business sense.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
- This commitment includes everyone reminding all employees and volunteers about their rights and responsibilities under the Equality, Diversity and Inclusion Policy. Responsibilities include staff and volunteers conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, service users, suppliers, visitors, the public and any others in the course of the organisation's work activities.

Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

- Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.

#### **Staff and volunteers commit to:**

- Understand that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

This Diversity, Equality & Inclusion Policy is fully supported by management and the Directors.

Details of the organisation's grievance and disciplinary policies and procedures can be found on our website. This includes with whom an employee should raise a grievance – usually their line manager.

Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

Staff are often faced with situations which challenge them. It is important to work within the law while acknowledging individual rights. There are seven Acts of Parliament that are directly relevant:

1. Part-time Workers Regulations (2020)
2. Equality Act (2010) and the Amendment Order (2012)
3. Mental Health Act (1983) and the Mental Capacity Act (2005)
4. Sexual Offences Act (1985) and updated Sexual Offences Act (2003)
5. Fixed Term Employees Regulation 2002
6. Human Rights Act (1998)
7. Rehabilitation of Offenders (1974) and amendments (2020)

#### **Relationships and Sex Education in schools (2019)**

The Department for Education is introduced compulsory Relationships Education for primary pupils from February 2019 and Relationships and Sex Education (RSE) for secondary pupils from September 2020. Also, from September 2020 it will be compulsory for all schools to teach Health Education. Resources available for Learning Disabilities from Times Educational (TES):

<https://www.tes.com/teaching-resources/blog/sre-students-learning-difficulties>

## **Sexuality**

Sexuality is not the physical act of sex. Sexuality is about sexual feelings, thoughts, attractions and behaviours towards other people. Finding each other physically, sexually or emotionally attractive are a part of individual sexuality.

Sexuality is diverse and personal, and it is an important part of who a person is.

Discrimination on the grounds of Sexuality is unacceptable. Any discrimination issues must be brought to the attention of the Customer Service Director.

This guidance relates to:

- gender identity – the sense that we are male or female or not aligned with either gender.
- sexual orientation, including heterosexual, homosexual and bisexual.
- personal dress, body image, personal grooming and sexual expression.

## **LGBTi+**

LGBTi+ describes the lesbian, gay, bisexual, and transgender community. The first three letters (LGB) refer to sexual orientation. The 'T' refers to Transgender identity. The "i" stands for intersex, these are people born with undetermined or both sets of genitals. The '+' stands for other spectrum of sexuality or gender identities, such as non-binary and Trans-sexual.

Impactful Governance has a Legal Duty to enable equality, diversity and human rights in our service, including for our staff, clients and volunteers. We promote LGBTi+ inclusive practices. LGBTi+ people need to be proactively supported by staff who understand the need to adequately balance risk and responsibility toward the individual concerned. This will help LGBTi+ people to form and maintain personal, loving, intimate and sexual relationships as well as express creativity and feel safe.

Everyone, including those with a learning disability, has different ways of expressing their sexuality; and this is part of their personality. Most people with learning disabilities develop physically within the parameters generally exhibited in the population at large, but in some cases their emotional and social development may be slower.

## **Cultural, religious or non-religious backgrounds**

When considering a person's cultural and religious background, we understand that culture is not fixed; assumptions about a person's cultural, religious and ethnic background are not used when planning or providing projects.

## **Age**

We offer a broad range of projects and have a diverse age group within our client base, organisations and staff. Wherever possible we will make reasonable adjustments and take into account people's age in a positive manner, to make reasonable adjustments and communicate in a way that suits the audience.

## **Discrimination**

Discrimination can be either direct or indirect.

Direct discrimination is when an individual is treated less favourably, based on a protected characteristic, such as disability, race, age, gender, etc.

Indirect discrimination is when there is a particular disadvantage for a particular group of people because requirements are applied – for example to a job or a service – or policies or practices adopted which cannot be justified as fair and reasonable.

Harassment is an act of discrimination, which is unwanted conduct by one person, or a group, which violates the dignity of another person, or group, or creates an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment might be perceived by a third party and pursued using the channels available.

## **Disability**

We are accredited to the Department of Work & Pensions standards as: "Disability Confident Committed" (Level 1) and a "Disability Confident Employer" (Level 2).



This policy and the consequential procedures have been adopted by: "Impactful Governance - Community Interest Company" (the organisation) by its Directors.

A handwritten signature in blue ink, appearing to read 'Andrew Waite'.

Signed and endorsed by.....

PRINT NAME IN CAPITALS. ...Andrew Waite (CEO)..

(a signed copy is also held in every individual staff personnel files)

<b>Date of last review</b>	April 2021
<b>Date of next review</b>	July 2022
<b>Date it was first implemented</b>	August 2017
<b>Author(s)</b>	Chief Executive
<b>Audience</b>	All Directors, Consultants, Employees, Volunteers and Stakeholders.
<b>Other relevant policies and/or procedures</b>	Conflicts of Interest Policy, Data Retention, Whistle Blowing policy, Disciplinary policy.
<b>Where it is saved</b>	<a href="http://www.ig-CIC.org.uk">www.ig-CIC.org.uk</a>

### **Please sign and rerun a copy of this policy by email or post to:**

Impactful Governance - Community Interest Company. Attn: Andrew Waite (Chief Executive)

**Luton Office:** West Wing Studios, Unit 166 The Mall, Luton, Bedfordshire LU1 2TL

**Registered Office:** The Old Free School, George Street, Watford, Hertfordshire WD18 0BX

Telephone: 01923 231660 website <https://www.ig-cic.org.uk>

# Equality, Diversity & Inclusion Implementation Plan

## Appendix A – Connected Environment Project Implementation Plan

<b>Impactful Governance – Community Interest Company</b>			
<b>Andrew Waite – Chief Executive</b> (Name of Employer/Senior manager)		has overall and final responsibility for health and safety	
<b>Alexandre Oliveira – Customer Service</b> (Member of staff)		has day-to-day responsibility for ensuring this policy is put into practice	
<b>Statement of general policy</b>	<b>Responsibility of: Name/Title</b>	<b>Action/Arrangements (What are you going to do?)</b>	<b>By When?</b>
<ul style="list-style-type: none"> <li>Encourage equality, diversity and inclusive thinking into the workplace or work environment as good practice and make social, ethical and business sense.</li> <li>Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.</li> <li>This commitment includes everyone reminding all employees and volunteers about their rights and responsibilities under the Equality, Diversity and Inclusion Policy. Responsibilities include staff and volunteers conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.</li> </ul>	Andrew Waite – Chief Executive	Induction procedure includes distribution and reading of this policy and Implementation Plan	Sent by email or post before commencing employment. Introduced on day 1 of induction.
	Alexandre Oliveira – Customer Service & Finance Director	Discussions with all participants at walks, presented by the Work Coach and Lead Walker together.	Introduced on day 1 of enrolment.
	All Directors: Rachel Perry, Andrew Waite & Alexandre Oliveira	Team meetings address Equality, Diversity & Inclusion	Monthly
	Project Lead	Equality & Diversity Training is conducted as part of an induction for all staff.	At the start of project, before operational activity commences.



<p><b><u>Staff, participants and volunteers commit to:</u></b></p> <ul style="list-style-type: none"> <li>Understand that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.</li> </ul> <p>This Diversity, Equality &amp; Inclusion Policy is fully supported by management and the Directors.</p> <p>Details of the organisation's grievance and disciplinary policies and procedures can be found on our website. This includes with whom an employee should raise a grievance – usually their line manager.</p> <p>Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.</p> <p>Staff are often faced with situations which challenge them. It is important to work within the law while acknowledging individual rights. There are seven Acts of Parliament that are directly relevant:</p> <ol style="list-style-type: none"> <li>8. Part-time Workers Regulations (2020)</li> <li>9. Equality Act (2010) and the Amendment Order (2012)</li> <li>10. Mental Health Act (1983) and the Mental Capacity Act (2005)</li> <li>11. Sexual Offences Act (1985) and updated Sexual Offences Act (2003)</li> <li>12. Fixed Term Employees Regulation 2002</li> <li>13. Human Rights Act (1998)</li> <li>14. Rehabilitation of Offenders (1974) and amendments (2020)</li> </ol>	<p>All team members: Staff &amp; Volunteers.</p>	<p>Open and transparent dialogue during 1-1 meetings.</p>	<p>Weekly where necessary.</p>
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<p><b><u>Relationships and Sex Education in schools (2019)</u></b>  The Department for Education is introduced compulsory <u>Relationships Education for primary pupils from February 2019 and Relationships and Sex Education (RSE)</u> for secondary pupils from September 2020. Also, from September 2020 it will be compulsory for all schools to teach Health Education. Resources available for Learning Disabilities from Times Educational (TES): <a href="https://www.tes.com/teaching-resources/blog/sre-students-learning-difficulties">https://www.tes.com/teaching-resources/blog/sre-students-learning-difficulties</a></p> <p><b><u>Sexuality</u></b>  Sexuality is not the physical act of sex. Sexuality is about sexual feelings, thoughts, attractions and behaviours towards other people. Finding each other physically, sexually or emotionally attractive are a part of individual sexuality.</p> <p>Sexuality is diverse and personal, and it is an important part of who a person is. Discrimination on the grounds of Sexuality is unacceptable. Any discrimination issues must be brought to the attention of the Customer Service Director.</p> <p>This guidance relates to:</p> <ul style="list-style-type: none"> <li>• gender identity – the sense that we are male or female or not aligned with either gender.</li> <li>• sexual orientation, including heterosexual, homosexual and bisexual.</li> <li>• personal dress, body image, personal grooming and sexual expression.</li> </ul> 	<p>Rachel Perry – Non-Executive Director</p> <p>Andrew Waite – Chief Executive</p>	<p>Where projects involve young people or vulnerable adults, discussions within the staff team and partner organisations take place.</p> <p>Membership of the Gay Professional Association.</p> <p>Active encouragement to express individuality. Active promotion and facilitation of discussions for other organisations about sexuality at Board level.</p>	<p>As needed.</p> <p>Ongoing information sharing and knowledge gathering at meetings.</p>
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<p><b><u>LGBTi+</u></b>  LGBTi+ describes the lesbian, gay, bisexual, and transgender community. The first three letters (LGB) refer to sexual orientation. The 'T' refers to Transgender identity. The "i" stands for intersex, these are people born with undetermined or both sets of genitals. The '+' stands for other spectrum of sexuality or gender identities, such as non-binary and Trans-sexual.</p> <p>Impactful Governance has a Legal Duty to enable equality, diversity and human rights in our service, including for our staff, clients and volunteers. We promote LGBTi+ inclusive practices. LGBTi+ people need to be proactively supported by staff who understand the need to adequately balance risk and responsibility toward the individual concerned. This will help LGBTi+ people to form and maintain personal, loving, intimate and sexual relationships as well as express creativity and feel safe.</p> <p>Everyone, including those with a learning disability, has different ways of expressing their sexuality; and this is part of their personality. Most people with learning disabilities develop physically within the parameters generally exhibited in the population at large, but in some cases their emotional and social development may be slower.</p>	<p>Alexandre Oliveira: Customer Service Director</p>	<p>Sponsorship or attendance at Pride Events. Locally or nationally.</p> <p>Equality &amp; Diversity Training is conducted as part of an induction for all staff.</p>	<p>June each year for Pride Month.  August for National Pride.  September for Watford Pride.</p> <p>Ongoing funding applications to generate new and informative projects on the LGBT+ agenda.</p> <p>At the start of project, before operational activity commences.</p>
<p><b><u>Cultural, religious or non-religious backgrounds</u></b>  When considering a person's cultural and religious background, we understand that culture is not fixed; assumptions about a person's cultural, religious and ethnic background are not used when planning or providing projects.</p>	<p>Rachel Perry: Non-Executive Director</p>	<p>Taking a secular approach to those who have religious beliefs and those that have none. We do not show bias or favour towards any religious group or organisations and will embrace all faiths and none in fair and equal measure.</p> <p>Where discrimination or conflicts arise with religious or sexual beliefs, these are always challenged in allowing full participation on our activities and projects.</p>	<p>Ongoing, as arises.</p>

<p><b><u>Age</u></b> We offer a broad range of projects and have a diverse age group within our client base, organisations and staff. Wherever possible we will make reasonable adjustments and take into account people’s age in a positive manner, to make reasonable adjustments and communicate in a way that suits the audience.</p>	<p>Alexandre Oliveira – Customer Service &amp; Finance Director</p>	<p>We offer a full range of age-specific and generic activities including: 16-24 year olds. 40+ years old 50+ years old 65+ years old Where we have a gap, we seek to redress.</p>	<p>Reviewed at Directors meetings bi-monthly.</p>
<p><b><u>Discrimination</u></b> Discrimination can be either direct or indirect. Direct discrimination is when an individual is treated less favourably, based on a protected characteristic, such as disability, race, age, gender, etc. Indirect discrimination is when there is a particular disadvantage for a particular group of people because requirements are applied – for example to a job or a service – or policies or practices adopted which cannot be justified as fair and reasonable. Harassment is an act of discrimination, which is unwanted conduct by one person, or a group, which violates the dignity of another person, or group, or creates an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment might be perceived by a third party and pursued using the channels available.</p>	<p>All team members: staff &amp; volunteers</p> <p>Project Lead</p>	<p>Issues of any discrimination will be raised with the Line Manager and dealt with swiftly to ensure complete equality, diversity and inclusion.</p> <p>Equality is embedded in personal development / staff appraisal processes.</p> <p>Remedial action is taken to address under-performance within this policy. This includes partners and stakeholders where under-representation is identified or inequalities emerge.</p>	<p>Ongoing</p> <p>Quarterly reviews</p>
<p><b><u>Disability</u></b> We are accredited to the Department of Work &amp; Pensions standards.</p>  <p>Monitoring of staff equality characteristics are published in our Impact Report.</p> <p>We strongly believe in employing and working with inclusive people and the characteristics are an indication used to review the blend of talent within the organisation that covers full representation.</p>	<p>Helena Marks-Dwyer, Alison Rowbotham, Rachel Perry, Andrew Waite, Helen Shelswell: Disability specialists.</p> <p>Chief Executive and Marketing Assistant</p>	<p>“Disability Confident Committed” (Level 1) and a “Disability Confident Employer” (Level 2).</p> <p>2020 baseline figures published: Team of ten stakeholders and staff – Representing Diversity and Inclusion at its core.</p>	<p>Annually reviewed with the intention of achieving level 3 Disability Leader.</p> <p>78 % Women, 56% BAME – Black, Asian, Minority or Ethnic, 11% Disabled, 22% LGBT+ - Lesbian, Gay, Bi-Sexual, Trans or other.</p>

Signed: 	Alex Oliveira Customer Service & Finance Director	Date:	23-6-21
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