

Equity, Equality, Diversity, and Inclusion Policy

Organisation	St Giles
Title	Equity, Equality, Diversity, and Inclusion Policy
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1. INTRODUCTION

This policy sets out St Giles' organisational approach to ensuring equality, equity, diversity and inclusion is considered both in the treatment of its employees and in service delivery arrangements. St Giles' core values and vision aligns with the belief that everyone should have equal access to opportunities and be treated equitably to fulfil their potential. St Giles Trust recognises that equality, equity of opportunity and diversity not only benefits us as individuals and as a charity, but society as a whole. We are fully committed to respecting and treating everyone fairly, eliminating discrimination and harassment, whilst actively promoting inclusion and good relationships between groups. This policy also outlines the arrangements for ensuring that we respond positively to the different needs in the people we work with and that all our service users can gain access and benefit equally from the work we do. We expect all who encounter our unique and innovative charity to treat each other with respect, courtesy, and consideration.

1.1. Scope

This policy applies to all those who represent or work at St. Giles. This includes trustees, employees, volunteers and third parties working on behalf of the charity.

This policy applies to all areas of St Giles Trust's service delivery and employment including:

- The recruitment of staff, their employment conditions, training and development, opportunities for promotion, benefits, facilities, health and safety, conduct at work, grievance and disciplinary procedures and termination of employment, including redundancy
- The provision of our services which includes fair access
- The design, development, and maintenance of our services
- The practices of our consultants and contractors

This policy shall be provided to all staff and volunteers. However, the policy does not form part of any contract of employment, and we may amend it at any time. This policy applies equally to the treatment of our visitors and suppliers.

2. POLICY STATEMENT

St Giles is committed to the principle and practice of equality, inclusion and celebrating the diversity of its people. St Giles appreciates that the people who work for us and use our services have diverse characteristics, different experiences, needs and aspirations. Through its employment and service delivery, St Giles seeks to actively promote equality, equity and inclusiveness for all our clients and workers and to challenge discrimination, harassment and exclusion.

St Giles will not discriminate against any individual based on their gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, disability, age, pregnancy and maternity or trade union membership or whether they are a temporary, part-time, or fixed-term worker.

St Giles will strive to ensure that we do not disadvantage anyone within our policies or conditions of service, which cannot be justified as necessary for operational purposes.

St Giles confirms its commitment to meet its responsibilities under the Equality Act 2010. Furthermore, due to the nature of our services, St Giles will comply with the Public Sector Equality Duty, which puts a duty on public authorities to consider or think about how their policies or decisions affect people who are protected under the Equality Act.

As an organisation committed to its values, St Giles practices are underpinned by our values, which are to be:

- Positively Empowering
- Persistently Supportive
- Flexibly Creative
- Proactively Empathic
- Actively Inclusive
- Clearly Communicating

St Giles will take all reasonable steps to ensure that our clients do not experience or are not disadvantaged by any aspect of our service provision. We are committed to working within a robust equality, diversity, and inclusion framework, so that we can manage our services appropriately and strive to ensure we operate in a non-discriminatory manner.

3. OUR APPROACH

St Giles will ensure that our services are delivered to our clients in a way that is fair and equitable, with positive steps being taken to address the needs of minority and disadvantaged groups.

St Giles will, as far as is possible, ensure that all who work for us get fair, equitable and equal treatment, with appropriate action being taken, where possible, so that individuals from disadvantaged groups are able to play a full part in all aspects of service development and delivery.

St Giles will provide training and development opportunities to our staff, volunteers, and Board members to support the implementation of this policy. We will update staff on any changes in best practice or relevant legislation as well as on the use of this policy and the implications of not adhering to it. All employees, volunteers and Board members are required to complete mandatory training in sexual harassment and EDI. These sessions are essential for ensuring compliance with our policies and maintaining a safe and respectful work environment.

St Giles Trust has various employee resources groups (ERGs) such as Black Awareness Group (BLAG), Neurodiversity Forum, Muslim Staff Group, LGBTQ+ group, Women's Network and Supporting Women in Menopausal Stages (SWIMS). These groups work closely with the EDI team and their individual Executive/Leadership sponsors to support the implementation of this policy. Further information about our ERGs and contacts can be found on the intranet.

4. RESPONSIBILITIES

Everyone has a duty to act in accordance with this policy, and therefore to always treat people with dignity, and not to discriminate against or harass anyone.

We expect everyone to take responsibility for the success of this policy and ensure that they familiarise themselves with and abide by the policy, acting in accordance with its aims and objectives. If you have any questions about the content or application of this policy, you should contact the Head of EDI.

In line with our Zero Tolerance Statement (please see Dignity at Work Policy), we are committed to creating and maintaining a psychologically safe and inclusive environment for all our people, peer advisors, volunteers, and our clients. St Giles will endeavour to protect all our people against discrimination and harassment from any third party they may come into contact with during the course of their work. This could include, but is not limited to, clients, partner organisations or funders.

St Giles is committed to ensuring that individuals who raise concerns and complaints about discrimination, harassment or any other breaches of this policy in good faith, are protected from victimisation.

Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to be an effective role model and be inclusive in their management style; leading by example and ensuring that those they manage adhere to the policy and promote the aims, objectives, and the values of St Giles with regards to Equality, Equity, Diversity and Inclusion. To facilitate this process, managers will be trained and provided with guidance, including equal opportunities within recruitment and selection.

The Board of Trustees has overall responsibility for the effective operation of St Giles Equality, Equity, Diversity, and Inclusion policy and for ensuring compliance with the relevant statutory framework prohibiting discrimination. The Board of Trustees delegate to the Chief Executive and its Senior Management Team the day-to-day responsibility for implementing the policy and ensuring its maintenance and review.

5. DEFINITIONS

5.1. Forms of Discrimination

Discrimination can come in one of the following forms:

- Direct Discrimination - treating someone with a protected characteristic less favourably than others

- Indirect Discrimination - putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage. (It is lawful to have specific rules or arrangements in place, if they can be justified.)
- Harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them
- Victimisation - treating someone unfairly because they have complained about discrimination or harassment or acted in good faith under the Equality Act 2010
- Associative discrimination - this is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
- Perceptive Discrimination - this is direct discrimination against an individual because others believe they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

These are addressed in further detail with some examples in the appendix. Note that these are a few examples and are not exhaustive.

5.2. Equality

Equality means everyone enjoying the same opportunities free from discrimination.

Our commitment extends beyond legal requirements for equality. We strive to provide everyone working with us equal opportunities, free from any form of discrimination, regardless of who they are.

5.3. Equity

Equity means being fair and impartial in all our processes, practices and interactions with all our people.

Equity acknowledges that people have different starting points and involves being fair and impartial in all our processes, practices and interactions with all our people, to address the imbalance. We commit to dismantling systemic disparities that prevent equitable access to opportunities and resources. Our work is guided by the principle of fairness, where every individual has the chance to thrive and succeed, regardless of their background, socioeconomic background or identity.

5.4. Diversity

Diversity is the presence of difference. We celebrate the abundance of diversity that exists within our organisation and communities. By acknowledging and embracing a wide range of backgrounds, experiences, cultures, and perspectives, we will foster a culture that is open to new ideas and innovation

5.5. Inclusion

Inclusion is about valuing difference and ensuring all our colleagues and clients feel respected, included and feel safe bringing their whole self to work. We will cultivate environments that nurture a profound sense of belonging and ensure that no one feels left out.

5.6. Disability

A disability is defined as a physical or mental impairment which has a long-term (usually lasting more than a year) and substantial adverse effect on a person's ability to carry out normal day-to-day activities. Several impairments, such as cancer, HIV, multiple sclerosis and mental health conditions are automatically considered disabilities and other progressive conditions will be considered a disability as soon as the symptoms of that condition have an adverse effect on the day-to-day activities. Reasonable Adjustment

A **reasonable adjustment** is a change or adaptation to the working environment to support an individual to carry out their role effectively.

6. APPLYING THE POLICY

This policy is to be considered in the implementation of all people policies at St Giles Trust including recruitment and selection (see the Recruitment and Selection policy) and learning and development (see the Learning and Development policy).

The diversity profile of staff at different levels of the organisation will be regularly monitored to ensure equality of opportunity across St Giles Trust. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities

and conditions of service to meet the special needs of disadvantaged or under-represented groups.

Our conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all workers who should have access to them and that there are no unlawful obstacles to accessing them. See the Total Reward Pay Policy.

6.1. Termination of Employment

We will monitor redundancy criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against employees.

We will also ensure that, where applicable, disciplinary procedures are carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

6.2. Fixed-term Employees and Temporary Workers

We will monitor our use of short and fixed-term employees and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress within St Giles Trust to ensure that they are accessing permanent vacancies.

Fixed-term employees and temporary workers should be treated the same as comparable permanent employees and enjoy no less favourable terms and conditions.

6.3. Part-time Workers

St Giles Trust will monitor the conditions of service of part-time employees and their progression within the organisation to ensure that they are being offered appropriate access to benefits and learning and development opportunities. We will also ensure requests to alter working hours are dealt with appropriately and in accordance with St Giles Trust Flexible Working Policy.

Part-time employees should be treated the same as full-time employees and enjoy no less favourable terms and conditions.

6.4. Volunteers

We are committed to the effective use of volunteers and recognise the valuable role they play in contributing to the success of our organisation. All volunteers should be treated with respect and part of our teams. Volunteers are expected to always treat all colleagues and clients with respect. For further information, please refer to the St Giles Trust Volunteer policy.

7. DISABILITY

St Giles must make 'reasonable adjustments' to ensure that workplace requirements or practices do not disadvantage employees or potential employees with a disability.

Reasonable adjustments should be made with the employee or potential employee's involvement. In law, adjustments must be 'reasonable' and need not be excessive. Careful consideration should be given to any proposal for adjustments, however there may be circumstances where it may not be reasonable for us to accommodate the suggested adjustments; in this case, information should be provided as to the basis of our decision.

Where possible and proportionate, St Giles Trust will take steps to improve access for disabled workers and service users.

8. OTHER STAKEHOLDERS

We believe that equality, diversity and inclusion are everyone's responsibility and are committed to promoting this policy to other stakeholders such as contractors, visitors and suppliers. We will ensure that all contractors, visitors and suppliers are clear about our expectations on equality, equity, diversity and inclusion.

9. BREACHES OF THE POLICY

Allegations regarding potential breaches of this policy will be treated in confidence and wherever possible, resolving concerns informally will be attempted in the first instance. If this is not appropriate or does not resolve the concern, the matter may proceed to a formal investigation. Both the complainant and respondent will be supported through this process, with a point of contact within the People Team. If, after investigation, you are proven to have harassed or discriminated against any other worker on the grounds of a protected characteristic or have otherwise acted in breach of this policy, you may be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. St Giles Trust takes a strict approach to serious breaches of this policy.

- This policy applies equally to St Giles workers' interactions with visitors, clients, and suppliers. If, after investigation, you are proven to have discriminated against or harassed a visitor, client, or supplier, you may also be subject to disciplinary action.
- If you believe you have been disadvantaged on any of the unlawful ground listed above, please refer to the Grievance Policy: [Grievance Policy and Procedure - St Giles Intranet \(stgilestrust.org.uk\)](https://stgilestrust.org.uk)
- If you believe that you may have been harassed on any of the unlawful grounds listed above, please refer to the Dignity at Work Policy: [Dignity at Work Policy - St Giles Intranet \(stgilestrust.org.uk\)](https://stgilestrust.org.uk)
- Volunteers and interns should refer to the Volunteer Policy: [Volunteering Policy - St Giles Intranet \(stgilestrust.org.uk\)](https://stgilestrust.org.uk)
- Please be aware and make use of the additional support available to you: Clinical Supervision: [Clinical Supervision - St Giles Intranet \(stgilestrust.org.uk\)](https://stgilestrust.org.uk) Employee Assistance Programme: [Employee Assistance Programme \(EAP\) - St Giles Intranet \(stgilestrust.org.uk\)](https://stgilestrust.org.uk)

10. MONITORING OF THE POLICY

We will regularly monitor and review the effectiveness of this policy to ensure it is achieving the objectives stated in the Policy Statement by:

- Monitoring and producing annual reports on the demographic makeup of our staff in relation to recruitment, training, grievances, and disciplinaries, sickness and turnover to the Executive, Leadership Team and Board of Trustees. This is for the purposes of developing and monitoring our Equality, Diversity, and Inclusion Practices
- Production of an annual report summarising key trends in demographics to be distributed to all staff
- Keeping the policy regularly under review for compliance with the legislative and operational perspective

11. LINKED POLICIES

This policy should be read in conjunction with:

- The Recruitment and Selection Policy
- The Volunteering Policy
- The Learning and Development Policy
- Dignity at Work policy
- Grievance policy
- Disciplinary policy
- Health and Safety policy
- Whistle Blowing Policy

This list is not exhaustive.

12. DOCUMENT CONTROL

- This policy needs to be formally reviewed every 3 years or when there are substantial legislative changes.

The current version of this Policy, together with its previous versions, shall be recorded below.

Version	Description	
1.0	Date Live:	December 2020
	Version Notes:	Policy Created November 2020; next review date December 2021
	Created by:	Stellamaris Mohammed
	Approved by:	Malcolm Walker
1.1	Date Live:	December 2021

	Version Notes:	No change
	Reviewed by:	Stellamaris Mohammed
	Approved by:	Malcolm Walker
1.2	Date Live:	April 2023
	Version Notes:	Reviewed to include other reporting lines for any breaches of the policy
	Reviewed by:	Stellamaris Mohammed
	Approved by:	Malcolm Walker
1.3	Date Live:	May 2023
	Version Notes:	Review to include Employee Resources groups/SMT Sponsors/Aims
	Reviewed by:	Stellamaris Mohammed
	Approved by:	Malcolm Walker
1.4	Date Live:	September 2024
	Version Notes:	
	Reviewed by:	Jonathan Seller & Mindy Sanghera
	Approved by:	Board and Exec Team

APPENDIX A

FORMS OF DISCRIMINATION WITH EXAMPLES

Direct Discrimination

This occurs when someone is treated less favourably than another person because of a protected characteristic.

Example – Mike, a Senior Manager, turns down Susan’s application for a supervisor position. Susan, who is a lesbian, learns that Mike did this because he thinks the team, she would have been supervising are homophobic. Mike thought that Susan’s sexual orientation would prevent her from gaining the respect of the team and this would therefore make her managing the team difficult. This is direct sexual orientation discrimination.

Discrimination by Association

This is direct discrimination against someone because they associate with another person who possesses a protected characteristic

Example – Farid is a Team Leader and had been told she was being promoted to a higher grade and would also be managing another small project. However, after Farid told her manager that her mother who lives with her has had a stroke, the promotion was withdrawn. This may be discrimination against Farid because of her association with a disabled person.

Perception Discrimination

This is direct discrimination against an individual because others believe they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic

Example – Kevin is 45 but looks much younger. Many people assume that he is in his mid-20's. Kevin is not allowed to represent his company at an important meeting because the CEO thinks that he is too young. Kevin has been discriminated against on the perception of a protected characteristic.

Indirect Discrimination

This can occur when you have a provision, condition, rule, policy or even a practice that applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if the organisation can show that they acted reasonably in managing the business e.g. that it is a 'proportionate means of achieving a legitimate aim'. Being proportionate really means being fair and reasonable, including showing that 'less discriminatory' alternatives have been explored before deciding.

Example – Sarah is in her late twenties and working as a social worker. She is fully qualified, doing well in her current role and ambitious. She spots a post advertised with another employer for what she sees as the next step in her career. However, the advertisement specifies that candidates must have ten years' experience in the profession. Sarah has six. Unless the employer can lawfully justify why candidates need ten years' experience, this is likely to be indirect discrimination against young candidates such as Sarah who can demonstrate that they are qualified and capable, but don't have ten years' experience because of their age.

Harassment

This is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Example – Ryan is disabled and is claiming harassment against his line manager after she has frequently teased and humiliated him about his disability.

Harassment Based on the Protected Characteristic of Another

As with direct discrimination, the law protects an employee against harassment based on someone else's protected characteristic.

Example – Richard shares an office with Ryan above and he too is claiming harassment, even though he is not disabled, as the manager's behaviour has also created an offensive environment for him.

Victimisation

This occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act about discrimination or harassment; or because they are

suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

Example – Anne makes a formal complaint against her manager because she feels that she has been discriminated against because of marriage. Although the complaint is resolved through the grievance procedure, Anne is subsequently ostracised by her colleagues, including her manager. Anne could claim victimisation.