

<b>Policy name:</b>	Equity, Diversity and Inclusion Policy	
<b>Policy Owner:</b>	Trust Leadership Team (TLT)	
<b>Author:</b>	Head of HR	
<b>Does this policy replace any existing policy? Yes/No</b>	If yes please refer to the related policies here: Equal Opportunities Policy	
<b>Latest revision date and reason (reviewed every two years):</b>		
<b>Version History</b>		
<b>Version number</b>	<b>Revision Date</b>	<b>Description of Change</b>
0.0	<b>New</b>	Introduction to support EDI strategy and ensure Trust's approach for EDI is clear for all staff and also meet Sexual Harassment Duty requirements
<b>Document Status</b>		
This is a controlled document. Whilst this document may be printed, the electronic version posted on togethernet is the controlled copy. Any printed copies of this document are not controlled. As a controlled document, this document should not be saved onto local or network drives but should always be accessed from togethernet.		

## **Equity, Diversity and Inclusion**

### **Accessibility**

This and other documents and pages on Together Net can be adapted to be more accessible. To make changes to suit your needs better use the Recite Me Toolbar. Some of the features include reading text aloud, adjusting the font choice, size and colour, dictionary, language translation, a magnifier, plain text mode, margins and audio download. Click on this link to go to the Recite Me user guide [here](#) and understand what changes are available and how you can make them.

We're committed to promoting equity and diversity in our workplace and in everything we do. We promote an inclusive and supportive working environment by ensuring all our employees, bank workers, volunteers and contractors understand and are able to act at all times in line with our values which are:

- Positive – We take pride in celebrating the difference we make
- Professional – We act in a fair and respectable way that recognizes our collective expertise
- Passionate – We encourage creative ideas and inspire one another
- Supportive – We are considerate and caring towards one another

The purpose of this policy is to ensure that the Trust's values and the delivery of our services are aligned. This policy sits alongside the implementation of our [EDI Strategy](#).

This policy applies to all employees, bank workers, volunteers and contractors (including agency workers) (collectively referred to as staff in this policy), and we expect all staff to uphold the values, ethos and expectations defined in this policy and apply this to interactions with both colleagues and the people who use our services.

This policy is non-contractual and we may amend it at any time.

If you are a contractor, agency worker, bank worker or a volunteer, then we will work with you and your agency or organisation to ensure that this policy is implemented appropriately.

### **Equity Statement**

Together Trust aims to design and implement policies, procedures and practices that meet the diverse needs of our workforce, ensuring that none are placed at a disadvantage over others.

Throughout the development of the policies and processes in this document, we have given due regard, under the Equality Act 2010, to the need to;

- eliminate discrimination, harassment and victimisation,
- advance equality of opportunity,
- foster good relations between people who have shared a relevant protected characteristic and those who do not share it;

**We have completed an Equity Impact Assessment for this policy which is attached (see Appendix A). Key points are below:-**

- The policy highlights information and support available, including flexible working and other leave
- The policy is written to simplify the content and also to highlight the link with tools to support accessibility from the start
- The policy includes links to key policies to provide support to meet needs across protected characteristics and how to raise a grievance or concern if anyone is experiencing inappropriate behaviour
- The policy makes it clear that it is everyone's role to removing discrimination,
- The policy makes it clear that everyone is expected to complete the mandatory training for EDI
- The policy is clear there is zero tolerance to discrimination and that this matter will be taken seriously and could result in disciplinary actions or contracts ending, there is a link to the Bullying and harassment policy
- This policy explains why employees sharing their workforce data is important and its links to Equity Impact assessments being impactful

## **1 Why is equity, diversity and inclusion important?**

1.1 As an employer and provider of residential, community care, educational, fostering, and other social care services, we aim to create equitable opportunities, celebrate diversity and build an inclusive culture of togetherness for the people we support, our governance and our workforce. We believe that diversity also makes our business better and stronger; encouraging ideas, innovation and a culture of learning. Ultimately, we want you to:

- Feel accepted in your teams;
- Feel safe and that you belong;
- Feel you are in an environment we all create that allows you to be able to bring your authentic self to work;
- Have equal opportunities to succeed;
- Have your voice heard, even if it goes against the status-quo;
- Not face any discrimination or bias at work;
- Be respected and taken seriously;
- Feel part of our organisation, wherever you work.

1.2 To make sure this happens, we're committed to equitable treatment for all - regardless of age, disability, gender reassignment, marital/civil partner status, pregnancy or maternity,

race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (known as **protected characteristics**). We're also committed to recognising and supporting neurodiversity within our business in all its varying and individual forms; for example, ADHD, Autism, Dyslexia and Dyspraxia. Furthermore, we want to improve equity for all from different social economic backgrounds so we can be an organisation where everyone has an equal opportunity to reach their full potential, irrespective of their protected characteristics or background. We also want to consider and support carers as much as we can.

- 1.3 We'll take action to ensure that unlawful discrimination on the basis of any protected characteristics is tackled quickly and efficiently, in line with our policies and procedures. We'll do this across all aspects of our business, from the moment you apply to join us, to the moment you leave. We won't tolerate any behaviour, action or language, including via social media, that fails to respect people's different cultural and personal backgrounds, or which breaches this policy. Any employee who breaches this policy may face action under our [Disciplinary policy](#). Any non-employee who breaches this policy may have their contract terminated with immediate effect. Please also see [the Bullying and harassment policy](#) .
- 1.4 Any language, conduct or behaviour that indicates discriminatory attitudes or practice on the part of any person who uses our services, including via social media, will be treated seriously by the Trust and may result in a service being withdrawn, reviewed or changed or some other appropriate action taken.
- 1.5 As it says in our [Code of Conduct](#); Everyone at work has a right to be treated with fairness and equity. You are asked to follow the Trust's Equality, Diversity & Inclusion policy. You have a personal responsibility for ensuring that your behaviour is not unfair and/or discriminatory. We expect you to be treated with dignity and respect at work and you are expected to treat others in the same way. You are entitled to work in an environment that is free of harassment, bullying and discrimination. Please refer to our [Bullying and harassment policy](#) which is available on the TogetherNet and Together Trust website for more information.

## 2 **Roles and responsibilities**

### 2.1 **All staff**

All staff are responsible for and are expected to:

- implement and abide by this policy, and our values and behaviours;
- be fully accountable for their behaviour;
- complete the mandatory [Equality, Diversity and Inclusion training](#), and other relevant EDI training as required, for example the online [training on sexual harassment](#) and take personal responsibility for continuing their own knowledge and skill development in this area
- treat all others with courtesy, dignity and respect;
- actively challenge and/or report any alleged use of discriminatory language, oppressive behaviour or any other relevant conduct that could be discriminatory or could breach this policy to their line manager or the HR team, please see [the Bullying and harassment policy](#); and

- ensure that all colleagues and the people who use our services are treated with dignity and respect, including ensuring that services provided are accessible and considerate to the needs of the diverse community that we serve.

## 2.2 **All leaders**

All managers and leaders are responsible for:

- actively championing EDI
- addressing any inappropriate behaviour that is not acceptable and does not support our EDI ambitions or Trust values or behaviours
- make sure accessibility is a priority for everyone and taking personal responsibility to ensure action is being taken where it is lacking
- implementing this policy, keeping up to date with any changes to this policy
- leading by example and demonstrating inclusive behaviour
- creating a culture of inclusion, fairness and respect for others;
- completing all specific equality, diversity and inclusion training and taking responsibility for continuing their own knowledge and skill development in this area
- providing equal access and setting expectations for all their team to complete all EDI training and development to meet the expectations agreed with and communicated by the learning and development team;
- listening to staff ideas and suggestions for improving services and ways of working, please see our [flexible working policy](#);
- signposting staff to tools, information or materials that they may need to assist them with their equity and diversity responsibilities;
- empowering their team to be able to raise concerns and speak up about discrimination and/or behaviours that breach this policy please see [the Bullying and harassment](#) policy;
- implementing reasonable adjustments for staff where necessary and appropriate, please see the [Disability and Reasonable Adjustments Policy](#); and
- ensuring that our internal procedures such as recruitment, promotion, development, training, disciplinaries and grievances are conducted in line with this policy.
- Understand what is important to each member of their staff. Then providing support to them to ensure that they are able to thrive and achieve the best outcomes. A number of related policies can help with this but please see [Other leave policy](#), [flexible working policy](#), [family friendly policies](#) and Gender identity policy

## 2.3 **Staff networks**

staff networks are responsible for:

- championing our values and inclusion and being part of the steering group to oversee the implementation of our ED&I strategy;
- creating a space for colleagues identifying with the purpose of the network to discuss relevant concerns they have. Promoting involvement and interaction amongst staff. Raising common themes/concerns to the appropriate leadership colleagues.
- working with our communications team to create an annual diversity calendar to raise awareness of key events throughout the year; and
- Promotion of the EDI policy

### 3 **What is unlawful discrimination?**

3.1 We have a zero tolerance policy towards any unlawful discrimination. You mustn't discriminate against anyone you come into contact with when working for us - including current and former employees, job applicants, people who use our services, students and their families, suppliers and visitors. We won't tolerate it inside or outside work, on work-related trips or on work events, including social events and social media.

3.2 When we say unlawful discrimination, we mean:

- **Direct discrimination:** treating someone less favourably than somebody else because of a protected or perceived protected characteristic – for example, not promoting a candidate because they're female, or perceived as disabled.
  - **Indirect discrimination:** having a rule or practice that applies to everyone but detrimentally affects someone with a protected characteristic more significantly - for example, requiring a specific qualification for a role that only someone younger would have.
  - **Harassment:** this could be sexual harassment or any other unwanted conduct relating to a protected characteristic – for example, using a racially offensive term. We've got a specific [policy related to Bullying and Harassment](#).
  - **Victimisation:** retaliation against anyone who has complained about or supported someone else's complaint about unlawful discrimination – for example, giving an unjustified poor performance review to someone who made an allegation of harassment.
  - **Disability discrimination:** this could be direct or indirect discrimination, discrimination related to disability or failure to make reasonable adjustments to alleviate disadvantages caused by a disability.
  - **Associative discrimination:** this means to discriminate against someone because of their association with a person with a protected characteristic - for example, discriminating against an employee or volunteer because they have a disabled dependent.
- 3.3 If you're unsure about whether or not something might be unlawful discrimination, speak to your line manager or the HR team.

## 4 What practical steps are in place?

### 4.1 Recruitment

4.1.1 Recruitment and promotion is conducted on the basis of merit, using selection processes, against objective non-discriminatory criteria. Shortlisting is done by more than one person and with the involvement of the HR team. Please see our [Safer recruitment policy](#).

4.1.2 We take steps to make sure that our vacancies are advertised to a diverse labour market. With limited exceptions, such as positive action to support underrepresented groups or conducting right to work checks, we won't take any steps during recruitment which either favour or discourage any individuals with protected characteristics.

### 4.2 Training, promotion, facilities, benefits and terms or conditions

4.2.1 Training needs are identified through regular performance reviews. You'll be given appropriate access to training to allow you to develop and thrive. All promotion decisions will be made on the basis of merit.

4.2.2 Our terms and conditions, benefits and facilities are reviewed regularly to ensure that they're available to all and non-discriminatory. We will use Equity Impact Assessments to make sure we are considering all the things we can to be inclusive.

### 4.3 Termination of employment

We'll ensure that redundancy criteria and procedures are fair, objective and not directly or indirectly discriminatory. We'll also make sure that our [Disciplinary policy](#) is applied without discrimination, regardless of the sanction.

### 4.4 Disability, Long term health conditions, deafness and neurodiversity

4.4.1 If you are or become disabled, have a long-term health condition and/or are neurodivergent, we want you to feel comfortable to tell us about this as soon as possible so we can support you. Please see our [Disability and reasonable adjustments policy](#).

4.4.2 If you experience difficulties at work because of your health and/or neurodiversity, speak to your line manager or HR shared service. We'll discuss any reasonable adjustments that might be taken to overcome or minimise the difficulty and take medical advice if helpful. We'll do our best to support and accommodate your needs. If we think a particular adjustment wouldn't be reasonable, we'll explain our reasons and try to find an alternative solution.

4.4.3 We'll monitor the physical features of our premises to consider whether they disadvantage anyone. If they do, we'll try to find a solution. We want to be as accessible as possible. Please speak to your line manager if you have any concerns.

#### 4.5 **Mental wellbeing and stress management**

We are passionate about supporting mental wellbeing and promoting a culture of open communication. Please see section 9 below for support that can be offered and further information about wellbeing on [Togethernet](#).

#### 5 **What should I do if I've got a concern?**

If you've any concerns in relation to potential discrimination or equal treatment, think about whether you feel able to raise the problem informally with your line manager; it may be easily resolved. If the problem can't be resolved informally, or you don't think the informal route is appropriate, you can raise it formally under our [Grievance policy](#). If you feel you need support, you should speak or email to the [HR team for guidance](#).

If the issue is not relating to you directly you could instead use the [Raising concerns and whistleblowing policy](#).

If you are a third party (like a customer or supplier) raise this using the [Trust complaints policy](#) we'll find an appropriate way to deal with your concern.

We'd always rather you reported concerns in as much detail as you can and using the process(es) above as this will allow us to get a level of information for us to investigate fully and keep you informed as well as look after your wellbeing at the same time. There may be some situations where you feel you need to raise your concern without letting us know who you are. If this feels like your only option we have created an anonymised form you can complete to report instances of harassment. The information from the reporting tool is accessed by a limited number of HR colleagues. They will follow the steps in the bullying and harassment policy as closely as possible based on the information provided in the disclosure. This is a [link](#) to that form.

#### 6 **Who will be told?**

We'll only communicate with those directly involved and details will only be disclosed on a 'need to know basis'. We'll tell anyone involved in the process that they must keep to this approach. You'll normally be told the names of any witnesses whose evidence is relevant to your grievance, unless we believe that anyone's identity should be confidential.

#### 7 **What happens next?**

7.1 If we find you've been the subject of unlawful discrimination, the matter will be dealt with under our [Disciplinary policy](#). If the person involved is a third party (like a customer or supplier) we'll find an appropriate way to deal with the problem. Whether or not your complaint is upheld, we'll consider how best to manage any ongoing working relationships.

7.2 Anyone who makes complaints relating to discrimination in good faith mustn't suffer any form of retaliation or victimisation. If you think this is happening, speak to your line manager or the HR team so that we can deal with the issue. If we conclude that your complaint is not upheld you will not be subject to any disciplinary action or to any other detriment. Action under our [Disciplinary policy](#) will only be considered if we conclude that you've both made false allegations and done this in bad faith, (that is without an honest truth in its belief).



## 8 Collecting EDI Data

- 8.1 If you are an employee, bank worker or volunteer, we collect and record data relating to ethnicity, religion or belief (if any), marital status, gender, disability, sexuality and gender reassignment and social economic background. For employees and bank workers [this link](#) takes you to Employee self serve where you can update yours.
- 8.2 We encourage staff to share their diversity data as we use this data to better understand the profile and diversity of our staff, so that we're able to determine our equity, diversity and inclusion priorities and take this into consideration as we think about future policies, procedures and practices.
- 8.3 The information that you share will be stored securely against your staff record. This information will be combined with other diversity data we have collected. It will be anonymised and we won't be able to identify any individuals from any reports that we publish on our diversity data.
- 8.4 Every area of the data we collect gives you the option to 'prefer not to say' if you do not want to share that particular part of your identity.
- 8.5 We understand that sometimes your diversity data can change, e.g. if you develop a health concern or disability, this information can be added to your staff record on iTrent. To ensure that data is kept up to date, we may remind staff from time to time to check and/or renew their diversity data.
- 8.6 If you have any questions about how your data is collected, stored or used, then please contact us at [edi@togethertrust.org.uk](mailto:edi@togethertrust.org.uk).
- 8.7 One of the ways we use your data is to conduct Equity Impact assessments for all our policies, processes, events and activities. An example of the one done for this policy is included as appendix A. These are important so the things we do in the Trust are as equitable as possible for our workforce.

## 9 Support and resources

We can offer you support in a variety of ways:

- 9.1 We operate an **Employee Assistance Helpline; Tellus Health**. Tellus Health is a free, confidential telephone and web-based information support service providing you with access to caring professionals consultants and counsellors. You can find further details on TogetherNet by clicking the link [here](#).  
  
The Tellus Health contact number is 0800 169 1920, and they can offer you emotional support 24 hours a day, seven days a week. The log in details for Tellus Health to access the support is as follows: username is 'together', and the password is 'trust'.
- 9.2 We also have fully trained **mental health first aiders** across the Trust who are available for support and to listen to you should you need to talk. You can find the details of who they are on Togethernet or simply click on the link [here](#) or email their inbox asking for support [together@togethertrust.org.uk](mailto:together@togethertrust.org.uk) and a mental health first aider will get in touch to agree how best to help.

- 9.3 If you're suffering with stress, depression, or anxiety, we encourage you to discuss this with your line manager as soon as possible. It may be useful to complete a **stress risk assessment**. We might also seek advice from occupational health.
- 9.4 The **staff council** is a forum for colleague consultation and two-way information sharing. They inform colleagues and leaders about important information. They influence the Together Trust's strategies, policies, procedures and ways of working. You can talk to your representatives about anything around working at the Together Trust. You can also request for your representative to accompany and support you in any formal meetings. You can find out more about the staff council and who your representatives are by clicking the link [here](#).
- 9.5 We have a growing number of **EDI Networks** who support our colleagues and further details of our EDI strategy can be found by clicking the link [here](#). Below are the links to the individual networks;
- **Women's network** - support, empower, and inform female and trans women colleagues, employees, bank workers and volunteers [here](#).
  - **Proud Together network** - for LGBTQ+ staff to voice their needs and ensure that everyone feels represented [here](#).
  - **Disability and neurodiversity network** – for staff and volunteers with disabilities &/or neurodiversity including colleagues with long-term health conditions and those who are carers [here](#).
  - **Race equality network** - Identity based network for African, Caribbean, Asian and racially minoritised staff and volunteers including those who identify as black, brown or as a person of colour including dual or mixed heritage [here](#).
- 9.6 The Trust is also signed up to the DWP scheme, **Able Futures**. Able Futures is a scheme available to all employees and they provide a dedicated health care professional to support people experiencing mental health difficulties that could affect their work. You can contact them on Freephone 0800 321 3137 or at [www.able-futures.co.uk](http://www.able-futures.co.uk)
- 9.7 If you have any further questions, we encourage you to speak to your line manager, where possible, and you can also contact the HR Shared Service
- 9.8 You can find more information about EDI at Together Trust on [Togethernet](#)
- 9.9 We've included some links to resources where further information and support are available below:

**EHRC (Equality & Human Rights Commission)**

*The EHRC encompasses the former Commission for Racial Equality, the Disability Rights Commission and Equal Opportunities*

Arndale House  
Arndale Centre  
Manchester  
M4 3EQ

Tel: 0845 6046610

Equality Direct Helpline:  
0845 6003444

[www.equalitydirect.co.uk](http://www.equalitydirect.co.uk)

## **Employers Forum on Disability**

[www.disability.gov.uk](http://www.disability.gov.uk)

Nutmeg House  
66 Gainsford Street  
London  
SE1 2NY

Tel: 020 740 33020

[www.employers-forum.co.uk](http://www.employers-forum.co.uk)

## **Dial UK**

*A national charity run by and for people with disabilities. They have 140 centres nationally providing:*

- *A disability information database and monthly information service*
- *Support for Welfare Rights Advisors*
- *Management Support*
- *Training*

St Catherine's  
Tickhill Road  
Doncaster  
South Yorkshire  
DN4 8QN

Tel: 01302 310123

Email: [enquiries@dialuk.org.uk](mailto:enquiries@dialuk.org.uk)

## **Disability Equality in Education**

Unite GL  
Leroy House  
436 Essex Road  
London  
N1 3QP

Tel: 0207 359 3372

Email:  
[info@diseed.org.uk](mailto:info@diseed.org.uk)

Web: [www.diseed.org.uk](http://www.diseed.org.uk)

## **Greater Manchester Coalition of Disabled People**

B.E.V.C.  
Aked Close  
Ardwick  
Manchester  
M12 4AN

Tel: 0161 273 515374

(voice/text)

Info: 0161 283 5137  
(text)

Minicom: 0161 273 4279  
(eve/w'ends)

Email: [info@gmcdp.com](mailto:info@gmcdp.com)

Web: [www.gmcdp.com](http://www.gmcdp.com)

**Stonewall**

*Advice, information and support members and  
allies of the LGBTQ+ community*

Tower Building

York Road

London

SE1 7WX

[www.stonewall.org.uk](http://www.stonewall.org.uk)

**Stockport Race Equality Network**

*Advice and support for ethnically diverse communities*

The Space  
26 St. Petersgate  
Stockport  
SK1 1HD

Email: [email@srep.co.uk](mailto:email@srep.co.uk)

Phone: 07726 641 236

**Disability Stockport**

*Prides itself on being able to continue to make a difference to disabled people, specialising in Autism and mental health in the Stockport and Cheshire Area*

Email:  
[email@disabilitystockport.org.uk](mailto:email@disabilitystockport.org.uk)

Phone: 0161 480 7248

## Appendix A - Equity Impact Assessment form

### Assessment / Improvement Plan

<b>Title of the procedure, policy, process or implementation being assessed:</b>	EDI Policy
<b>Assessment Date</b>	May 3 <sup>rd</sup> 2024
<b>Name(s) of people undertaking this assessment</b>	Penny Robinson
<b>Is the policy aimed at a specific group of users?</b>	All employees, bank workers, volunteers and contractors
<b>Who have you or do you intend to communicate or engage with (internal and external) in relation to this assessment</b>	HR Policy Team, Staff Council, EDI Networks, EDI expert from Purple Infusion and TLT Leadership Team
<b>What data have you used to support your findings</b>	<p>Internal workforce data</p> <p><a href="https://www.cipd.org/uk/views-and-insights/cipd-viewpoint/gender-equality-work/">https://www.cipd.org/uk/views-and-insights/cipd-viewpoint/gender-equality-work/</a></p> <p><a href="https://www.cipd.org/uk/knowledge/reports/inclusion-perspectives-lgbt/">https://www.cipd.org/uk/knowledge/reports/inclusion-perspectives-lgbt/</a></p> <p><a href="https://www.cipd.org/globalassets/media/knowledge/knowledge-hub/reports/understanding-older-workers-report_tcm18-107672.pdf">https://www.cipd.org/globalassets/media/knowledge/knowledge-hub/reports/understanding-older-workers-report_tcm18-107672.pdf</a></p> <p><a href="https://www.cipd.org/uk/views-and-insights/cipd-viewpoint/race-inclusion-in-the-workplace/">https://www.cipd.org/uk/views-and-insights/cipd-viewpoint/race-inclusion-in-the-workplace/</a></p> <p><a href="https://www.acevo.org.uk/reports/home-truths/home-truths-undoing-racism-and-delivering-real-diversity-in-the-charity-sector-content/5/#key-findings">https://www.acevo.org.uk/reports/home-truths/home-truths-undoing-racism-and-delivering-real-diversity-in-the-charity-sector-content/5/#key-findings</a></p> <p><a href="https://researchbriefings.files.parliament.uk/documents/CBP-7540/CBP-7540.pdf">https://researchbriefings.files.parliament.uk/documents/CBP-7540/CBP-7540.pdf</a></p>

	<a href="https://www.cipd.org/uk/views-and-insights/cipd-viewpoint/disability-work/">https://www.cipd.org/uk/views-and-insights/cipd-viewpoint/disability-work/</a> <a href="https://www.cipd.org/uk/views-and-insights/cipd-viewpoint/religion-and-belief/">https://www.cipd.org/uk/views-and-insights/cipd-viewpoint/religion-and-belief/</a> <a href="https://www.gov.uk/government/publications/state-of-the-nation-2023-people-and-places">https://www.gov.uk/government/publications/state-of-the-nation-2023-people-and-places</a> <a href="https://www.cipd.org/uk/views-and-insights/thought-leadership/cipd-voice/barriers-social-mobility-workplace/">https://www.cipd.org/uk/views-and-insights/thought-leadership/cipd-voice/barriers-social-mobility-workplace/</a> <a href="https://www.cipd.org/uk/knowledge/guides/carer-friendly-workplace/">https://www.cipd.org/uk/knowledge/guides/carer-friendly-workplace/</a>
--	---

<b>Characteristic</b> (protected and other characteristics of employees)	<b>Positive and negative impact identified.</b>	<b>What changes or actions do you recommend to improve the the procedure, policy, process or implementation to eradicate or minimise the negative impacts on the specific groups identified?</b> Once you have assessed the impact, it is important to identify potential solutions to reduce or eliminate any negative impact.
<b>Gender</b> (male / female / nonbinary/ trans)	<ul style="list-style-type: none"> <li>• Together Trust data tells us that 76% of the workforce are women</li> <li>• TT gender pay gap in 2023 was 9.1% in favour of men, 76% of the workforce are women.</li> <li>• In the EDI audit from May 2021 1% of the 33% of employees who completed the audit said they had experienced discrimination in the last 12 months by someone I work with. 2% said they had received discrimination in the last 12 months from someone who they support.</li> <li>• CIPD research shows that “4% of employees said they had been sexually harassed at work over the past three years. “</li> <li>• Together Trust data tells us that there are a small number of colleagues who have completed their sensitive data who identify as non binary and who are or have transitioned gender.</li> <li>• CIPD research has shown “55% of transgender workers have</li> </ul>	<ul style="list-style-type: none"> <li>• Policy promotes Women Together and Proud Together staff networks</li> <li>• Flexible working and Other leave policies linked to this policy to support potential needs</li> <li>• See below actions to support all protected characteristics and other areas</li> </ul>

	<p><i>experienced conflict and harassment, compared with 29% of heterosexual, cisgender employees. In addition, a higher proportion of 18% of transgender workers feel psychologically unsafe in the workplace compared with heterosexual workers (10%).”</i></p>	
<b>Age</b> (18 years+)	<ul style="list-style-type: none"> <li>• TT data tells us that 6% of Trust employees (5) are under 25 or under and 2.6% are over 65 or over.</li> <li>• <i>“CIPD analysis of APS July 2020 – June 2021 shows that 32% of the workforce is made up of employees 16 – 24 and 12% of employees 65 or older. “</i></li> <li>• We have lower representation in both younger and older employees than in the national workforce.</li> <li>• In the EDI audit from May 2021 3% of the 33% of employees who completed the audit said they had experienced discrimination in the last 12 months by someone I work with. 4% said they had received discrimination in the last 12 months from someone who they support.</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Flexible working and Other leave policies linked to this policy to support potential needs/wants for older workers</li> <li>• See below actions to support all protected characteristics and other areas</li> </ul>
<b>Race / Ethnicity/ Nationality/ English as a second language</b>	<ul style="list-style-type: none"> <li>• We do not have TT data that enables us to see the percentage of the workforce who are not white British and this limits our ability to assess the level of potential discrimination that may be being experienced. In our EDI audit in May 2021 7.9 of the 33% of the workforce who completed it said they were from an ethnic minority and 2% said they had experienced discrimination in the last 12 months by someone I work with. 1.5% said they had received discrimination in the last 12 months from someone who they support.</li> <li>• According to the <a href="#">McGregor-Smith Review (2017)</a>, <i>“the employment rate in the UK for black and ethnic minority groups is only 62.8% compared with an employment rate for white workers of 75.6%. This gap is even worse for some ethnic minority groups; for instance, the employment rate for those from a Pakistani or Bangladeshi background is only 54.9%.”</i></li> <li>• <i>“Overall, about 1 in 8 of the working age population are from an ethnic minority background, yet these individuals make up only 10% of the workforce and hold only 6% of top management positions.”</i></li> </ul>	<ul style="list-style-type: none"> <li>• Policy importantly reminds us that everyone is an individual and line managers understanding the individual and what is important to them and helps them to thrive being key.</li> <li>• Policy promotes New Horizon staff network</li> <li>• See below actions to support all protected characteristics and other areas</li> </ul>



	<ul style="list-style-type: none"> <li>In Dec 2021 The ACEVO Home Truths reports found that; “ <ul style="list-style-type: none"> <li>68% of respondents (335 out of 489 people) said that they had experienced, witnessed or heard stories about racism in their time in the charity sector and</li> <li>50% of respondents (246 people out of 490) felt that they needed to ‘tone down’ behaviour or to be on their ‘best behaviour’ in order to fit in in the charity sector.</li> <li>222 people had been subject to ignorant or insensitive questioning about their culture or religion.</li> <li>147 people had been treated as an intellectual inferior.</li> <li>114 respondents had been subject to excessive surveillance and scrutiny by colleagues, managers or supervisors’.</li> <li>These experiences cause harm.</li> <li>One-hundred and sixteen people stated that direct experiences of racism had had a negative or very negative impact on their health and emotional wellbeing.</li> <li>And a further 94 respondents who had experienced racism said that it had had a negative or very negative impact on their ‘desired career path’.”</li> </ul> </li> </ul>	
<b>Disability</b> (hearing / visual/ physical/ learning disability /mental health)	<ul style="list-style-type: none"> <li>We do not have TT data that enables us to see the percentage of the workforce who are disabled and this limits our ability to assess the level of potential discrimination that may be being experienced but we are aware that we employ a number of disabled employees. In our EDI audit in May 2021 17.4% of the 33% of the workforce who completed it said they were disabled and 3% said they had experienced discrimination in the last 12 months by someone I work with. 0 said they had received discrimination in the last 12 months from someone who they support.</li> <li>In the Disabled People in Employment report from the House of commons library March 2024. “<i>The employment rate of disabled people was 54.2%, up from 52.7% a year previously. The employment rate for people who are not disabled was 82.0%</i>”</li> </ul>	<ul style="list-style-type: none"> <li>Employees accessibility to Trust policies has been increased by enabling Recite me on Together Net for example play audio – reading text aloud, adjusting the font choice, size and colour, dictionary, language translation and magnifier, plain text mode, margins &amp; audio download and reminding them of these features during the capability process.</li> <li>The policy has been created as a downloadable document which can be printed and shared in hard copy. Paper copies of all documentation should be provided/offered and to employees and they should both be reminded of the accessibility features of Together Net with support provided to access the</li> </ul>

	<ul style="list-style-type: none"> <li>CIPD says “<i>There are more than 7 million people of working age with a disability or long-term health condition in the UK. Around half of them are in work but many more would like to work, and they represent a great source of skills and talent.</i></li> </ul> <p><i>Many people with disabilities and long-term health conditions either face prejudice or a lack of provision when it comes to the support they need to help them reach their potential or, sometimes, to even remain in work. Too many people working with a disability choose not to share this information with their employer for fear of negative consequences (in terms of their career or job security).”</i></p> <ul style="list-style-type: none"> <li>Feedback from the staff Disability and neurodivergency action network suggests that colleagues are hiding their disability or neurodivergency due to fear of how this will be responded to in TT.</li> <li>There are also a number of ‘hidden disabilities’ that colleagues may not feel they want to share but are affecting their ability to fully do their role without reasonable adjustments</li> </ul>	<p>policy and documents online or paper if required.</p> <ul style="list-style-type: none"> <li>The policy links to the Disability and reasonable adjustments policy</li> <li>Policy promotes Disability and neurodivergency network</li> <li>See below actions to support all protected characteristics and other areas</li> </ul>
<b>Religion / Belief</b>	<ul style="list-style-type: none"> <li>We do not have TT data that enables us to see the % of the workforce who practice in line with a religion or belief.</li> <li>In the EDI audit from May 2021 1% of the 33% of employees who completed the audit said they had experienced discrimination in the last 12 months by someone I work with 1% said they had received discrimination in the last 12 months from someone who they support.</li> </ul> <p>and this limits our ability to assess the level of potential discrimination that may be being experienced.</p> <ul style="list-style-type: none"> <li>CIPD quotes “<i>A 2017 report by consultancy ComRes showed that 3% of workers still say they are discriminated against because of their religion or beliefs, and a similar proportion report having witnessed colleagues being discriminated against on this basis.</i></li> </ul> <p><i>The evidence also revealed a significant mismatch between HR and employee perceptions about provisions their organisation makes to cater for religious inclusion. For example, while 91% of HR managers say their organisation promotes understanding of equality, diversity and inclusion with regards to religion and belief to some or a great extent, only a quarter</i></p>	<ul style="list-style-type: none"> <li>Examples of discrimination and not being inclusive as a behaviour is included in the policy linked to religion and belief</li> <li>See below actions to support all protected characteristics and other areas</li> </ul>

	<i>of workers agree this is the case.”</i>	
<b>Sexual Orientation</b> (Gay/Lesbian/Bisexual, Other)	<ul style="list-style-type: none"> <li>We do not have TT data that enables us to see the percentage of the workforce who identify as LGBTQ+ and this limits our ability to assess the level of potential discrimination that may be being experienced. In our EDI audit in May 2021 9.9% of the 33% of the workforce who completed it said they were LGBTQ+ In the EDI audit from May 2021 1% of the 33% of employees who completed the audit said they had experienced discrimination in the last 12 months by someone who they support.</li> <li>CIPD research has shown <i>“40% of LGB+ workers and 55% of transgender workers have experienced workplace conflict and harassment, compared with 29% of heterosexual, cisgender employees. In addition, a higher proportion of LGB+ workers (16%) feel psychologically unsafe in the workplace compared with heterosexual workers (10%), while for transgender workers, this figure is even higher at 18%.”</i></li> </ul>	<ul style="list-style-type: none"> <li>Policy promotes Proud Together staff network</li> <li>See below actions to support all protected characteristics and other areas</li> </ul>
<b>Gender Re-Assignment</b>	<ul style="list-style-type: none"> <li>We do not have TT data that enables us to see the percentage of the workforce are considering or going through gender reassignment and this limits our ability to assess the level of potential discrimination that may be being experienced. In our EDI audit in May 2021 under 2% of the 33% of the workforce who completed it said they were non binary or trans.</li> <li>CIPD research has shown <i>“55% of transgender workers have experienced conflict and harassment, compared with 29% of heterosexual, cisgender employees. In addition, a higher proportion of 18% of transgender workers feel psychologically unsafe in the workplace compared with heterosexual workers (10%).”</i></li> <li>We have only just launched our Gender identity policy and it still may not be well known or trusted by staff as it is a ‘new’ policy (2024)</li> </ul>	<ul style="list-style-type: none"> <li>Policy promotes the Proud Together staff network</li> <li>The Gender Identity policy will be linked in the EDI policy</li> <li>See below actions to support all protected characteristics and other areas</li> </ul>
	<ul style="list-style-type: none"> <li>We do not have TT data that enables us to see the percentage of the</li> </ul>	<ul style="list-style-type: none"> <li>Although we are not aware of any impact as this is a protected characteristic we are including it in the EDI policy and drawing attention to it in the same way as the other protected characteristics and being clear on</li> </ul>

<b>Marriage &amp; Civil Partnership</b>	<p>workforce who are married or in civil partnership and this limits our ability to assess the level of potential discrimination that may be being experienced.</p> <ul style="list-style-type: none"> <li>No impact we are currently aware of</li> </ul>	<p>everyone's role to our zero tolerance to discrimination, link to bullying and harassment policy</p>
<b>Pregnancy &amp; Maternity</b>	<ul style="list-style-type: none"> <li>In the last 12 months April 23/March 24 we have had 34 (3.8% of our workforce) colleagues on maternity leave</li> <li>CIPD research "<i>shows around <u>one in nine mothers</u> (11%) reported that they were either dismissed, made compulsorily redundant (where others in their workplace were not), or treated so poorly they felt they had to leave their job.</i>"</li> </ul>	<ul style="list-style-type: none"> <li>We have a beneficial maternity, adoption, paternity and shared parental maternity offer</li> <li>We have paid dependents leave , link the EDI policy to the Other leave policy</li> <li>There is a clear link between this policy and the 'family friendly' policies</li> <li>Policy promotes all staff networks</li> <li>See below actions to support all protected characteristics and other areas</li> </ul>
<b>Social mobility</b>	<ul style="list-style-type: none"> <li>We don't currently have the data that enables us to see the social mobility across the workforce and this limits our ability to assess the level of potential discrimination that may be experienced <ul style="list-style-type: none"> <li>Social mobility Commission report from 2023 says "<i>As might be expected, we have found that adults with lower working-class parents are about 3 times as likely – 30% against 11% – to be in a lower working-class occupation themselves compared to adults with higher professional parents. In education, people whose parents had degrees are far more likely – 64% against 18% – to get a degree than those whose parents had no qualifications. And on housing mobility, we have found a significant tightening of the link between parental home ownership and children's home ownership.</i>"</li> <li>And the intersectional impact of social mobility when sitting with other minoritised protected characteristics "<i>But the breakdowns reveal many variations inside this high-level pattern. For example, women are less likely than men to</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Link to flexible working policy</li> <li>See below actions to support all protected characteristics and other areas</li> </ul>

	<p><i>experience upward occupational mobility, even though their educational outcomes are better. Similarly, educational mobility is far better among some ethnic groups – for example, 64% of Chinese-British people whose parents had no degree went on to obtain a degree, compared with only 28% among White British people. Yet these better educational outcomes are not always mirrored by improved access to professional jobs. And unfortunately, the mobility outcomes of people with a disability are consistently worse than the outcomes of those without, across occupation, income, education and housing.”</i></p>	
<b>Caring responsibility</b>	<ul style="list-style-type: none"> <li>• Around 60% of unpaid carers are women, and 76% of our workforce are women.</li> <li>• CIPD say “<i>Almost a third of working carers in the UK have not discussed their caring role with anyone at their workplace, most commonly because they believed that nothing would change as a result. A quarter of working carers in the UK were also considering giving up their job entirely because of the difficulty in combining work and care.</i>”</li> <li>• We do not capture this data as part of our sensitive information so would be unaware of how this may affect how colleagues feel about working for TT <a href="https://www.crossroads-caringforcarers.org/about-crossroads/">https://www.crossroads-caringforcarers.org/about-crossroads/</a></li> </ul>	<ul style="list-style-type: none"> <li>• We do have other leave for dependents, link the EDI policy to the other leave policy</li> <li>• Link to the flexible working policy</li> <li>• Policy promotes Women Together staff network</li> <li>• See below actions to support all protected characteristics and other areas</li> </ul>
<b>OTHER:</b> Domestic violence, Trade Union status, contract type e.g. full/part time, permanent or fixed term, inexperienced LM	<ul style="list-style-type: none"> <li>• In England, 16.4% of adults, or 7.1 million people, can be described as having "very poor literacy skills." This means they can understand short straightforward texts on familiar topics accurately and independently, and obtain information from everyday sources, but reading information from unfamiliar sources, or on unfamiliar topics, could cause problems. This is also known as being functionally illiterate. The average reading age in the UK is suggested to be 9 years old.</li> </ul>	<ul style="list-style-type: none"> <li>• Encourage employees throughout the Trust to engage with the policy in a more meaningful way by simplifying the content, making the policy available to access on TogetherNet</li> </ul>

<b>All characteristics and other areas</b>	<ul style="list-style-type: none"> <li>• See above</li> </ul>	<ul style="list-style-type: none"> <li>• The policy highlights everyone's role in removing discrimination, including the training that MUST be completed</li> <li>• The policy is clear there is zero tolerance to discrimination and that this matter will be taken seriously and could result in disciplinary actions or contracts ending, link to bullying and harassment, grievance and raising policies</li> <li>• Support for colleagues and groups and ways of finding more information is a key part of the policy</li> <li>• We conducted an EDI audit in May 2021 and will rerun this in coming years</li> <li>• We have an EDI calendar which is made reference to in the policy which highlights a number of relevant dates for people identifying with different protected characteristics and intersectionally</li> <li>• We discuss in the policy the importance of Equity Impact Assessments to make sure we consider fully all policies, processes, events and activities the Trust is involved in</li> <li>• We are clear in the policy we will take appropriate action if there is discrimination from either other employees or the people we support</li> </ul>
--	---	--

Action Plan to mitigate negative impacts and minimise or eradicate their impact	Who is responsible	When is action to be taken/completed	Confirm here date when completed
Line Managers to ensure they follow policy guidance, read relevant associated policies and seek support from HR to ensure discrimination and bias are eliminated and employees are supported appropriately.	Line Managers	As appropriate	
Line managers to complete the EDI training themselves and support their employees to complete the EDI training	Line Managers	As appropriate	
Complete a review of implementation with staff council leads and staff networks leads	HR team	6 months post launch	
Via the implementation of the EDI Strategy create a culture of ongoing learning around EDI and psychological safety	TLT	Ongoing	

<b>1. How do you intend to communicate or engage with internal and external stakeholders in relation to the actions and proposals for improvements?</b>	Policy to be shared with Staff Council, EDI networks, HR Policy Review Team, and TT senior leadership for discussion and feedback.	
<b>2. How will actions and proposals be monitored to ensure their success?</b>	State how actions and proposals will be monitored to ensure Success: <ul style="list-style-type: none"> <li>• Demographic and monitoring of iTrent data.</li> <li>• Review to be completed with potential to update policy accordingly where more ideas are suggested or working etc</li> <li>• Request and remind Networks of value of feedback in whatever format (verbal/anonymous etc.) every quarter</li> </ul>	
<b>3. When is the date of the next review?</b>	Nov 2025	
<b>4. Who will be responsible for monitoring these actions?</b>	Penny Robinson	Head of HR
<b>5. Who is the the procedure, policy, process or implementation owner</b>	Penny Robinson	Head of HR

**Once you have completed this form please contact your the procedure, policy, process or implementation owner or administrator for next step**

# Equity Impact Assessment – Guidance notes

## What is an Equity Impact Assessment

An EIA is a tool that helps organisations ensure their policies, procedures and practices are inclusive and fair to everyone.

There is data and evidence which tells us the protected groups are more likely to face health inequalities, e.g.:

An EIA should be completed before you complete any proposal, policy or make any decision. The information from the EIA should inform your decision making /policy/process.

## The Public sector equality duty

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

## When completing the EIA, consider;

### **1. What differential impacts both positive and negative impacts can you identify for different groups?**

- Review the data – Either at Trust level, Charity sector, (or Education, social care or therapy sector if appropriate), or nationally.
- List what positive and negative impacts

### **2. What changes or actions do you recommend to improve the procedure, policy, process or implementation of something new to eradicate or minimise the negative impacts on the specific groups identified?**

- Identify potential mitigating solutions to reduce or eliminate any negative impact.



- Mitigating solutions considered could be adapting the procedure, policy, process or implementation, changing the way in which it is implemented or introducing balancing measures to reduce any negative impact.
- When considering solutions, you should think about how it will reduce any negative impact, how it might impact on other groups and how it might impact on relationships between groups and overall community cohesion.
- You should clearly demonstrate how you have considered potential solutions and the impact of these.