

1625 Independent People
Equity, Diversity and Inclusion Policy

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1 Policy position

1.1 Purpose

This Policy formalises 1625 Independent People's (1625IP) commitment to quality, effectiveness and efficiency underpinned by equity for everyone referenced in section 3.1 below. This Policy and the related Procedure, applies to all aspects of our relationship with everyone referenced in section 3.1 below and to relations between colleagues at all levels. Our related Procedure sets out our commitments as a service provider, as a policy maker, as an employer, and as a recruiter.

In carrying out its functions, 1625IP will have due regard to the different needs of different protected groups in their area. This includes all the activities for which 1625IP is responsible, including service delivery, policy development, review and implementation, and in relation to its activities as an employer and a recruiter, it includes job advertisements, recruitment and selection, training and development, opportunities for promotion, retention, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

1.2 Principles

This document has been assessed to ensure that no one receives less favourable treatment due to the protected characteristics of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex (gender) or sexual orientation. Performance is measured by the People team and reported to the People Committee biannually, and to the Strategic and Full Management teams quarterly, with recommendations for improvement.

1625IP is committed to promoting equity of opportunity for all colleagues, job applicants and young people. We aim to create a working and operational environment in which all individuals are able to make the best use of their skills, that is free from discrimination, harassment and victimisation, and in which all decisions are based on merit.

Our aim is to achieve continuous improvement for all of our services and our related Procedure, explains how we intend to evaluate our services and measure our performance

in terms of equity, as well as setting out our commitments to equity in service delivery, accessibility and development. This also applies when we are developing plans, policies and strategies and in our work with suppliers, contractors and partners.

We acknowledge that discrimination and prejudice exist, and we are committed that no-one working with us, applying to work with us, receiving our services or applying for services is discriminated against in terms of any protected characteristic (although it should be noted that housing and support services are restricted to those aged 16 to 25).

We also aim to ensure that no one is discriminated against on the grounds of having a criminal conviction. However, given the vulnerability of the young people we house and support, we always consider criminal convictions of applicants to our services and for employment. We do not employ or provide services to anyone if this would present an unacceptable high risk to young people or our colleagues.

2 Statutory / regulatory considerations

2.1 Statutory A

- The Equality Act 2010, including the Public Sector Equality Duty
- Rehabilitation of Offenders Act 1974 (including new guidance March 2014)
- Legal Aid, Sentencing and Punishment of Offenders Act 2012
- The Employment Act 1989 and the Employment Rights Act 1996
- Pregnant Workers Directive
- Article 119 of the Treaty of Rome & Equal Treatment & Equal Pay Directives made under the Treaty
- The Human Rights Act 1998
- Employment Relations Act 2004 as amended
- Part-time Workers (less favourable treatment) Regulations 2000
- Immigration, Asylum and Nationality Act 2006
- The Police Act 1997
- The Civil Partnership Act 2004
- The Data Protection Act 2018
- General Data Protection Regulation (EU) (2016/679)
- The Privacy and Electronic Communication (EU Directive) Regulations 2003

- Freedom of Information Act 2000
- The Environmental Information Regulations 2004

2.2 Regulatory B

- The UN Convention on the elimination of all forms of discrimination against women
- The UN Convention on the elimination of all forms of racial discrimination
- The UN International Covenant on civil and political rights
- The UN International Covenant on economic, social and cultural rights
- The UN Standard Rules on equalisation of opportunities for people with disabilities

3 Scope and definitions

3.1 Scope

This Policy covers all individuals working at all levels and grades, including managers, officers, directors, employees, consultants, contractors, trainees/apprentices, homeworkers, part-time and fixed-term employees, volunteers, interns, casual workers, Board members and agency staff (collectively referred to as *colleagues* in this policy). It also covers our young people and other organisations with whom we work. This Policy does not form part of any employee's contract of employment and may be amended at any time.

3.2 Definitions

Definitions of the following words are set out in section 3.2 of the related Procedure document: discrimination, direct discrimination, discrimination by association, perception discrimination, indirect discrimination, harassment, harassment by others, victimisation, institutional discrimination, and a racist incident.

4 Responsibility

All colleagues and others who undertake activities on behalf of 1625IP have a duty to carry out the requirements and responsibilities outlined in this Policy. Particular responsibilities include:

- The Board support this Policy and will work toward the promotion of equalities in all of 1625IP's policies and other activities. The Board has a nominated 'Equalities Champion' role whose role it is to have equalities at the forefront of their thinking in

all Board discussions and to make sure that we are thinking about equity and diversity issues in all of the organisation's work. Equalities training is part of the training provided to Board members.

- The Chief Executive Officer has overall responsibility for the effective operation of this Policy and for ensuring compliance with law, updating the Equity, Diversity and Inclusion Action Plan for colleagues and policy issues as relevant. Day to day operational responsibility, including regular review of this Policy, has been delegated to the Operations Directors for take up of service and the Head of People for employment.
- The SLT are responsible for analysis of the data collected on young people and colleagues, the identification of any issues that these present and the formulation of actions to combat any under representation or potential discrimination issues and are responsible for updating the Equity and Diversity Action Plan for young people issues. The Learning and Development Strategy Group (LDSG) have overall responsibility for equal opportunities training, in particular that all colleagues who take part in recruitment panels receive training on fair recruitment and selection best practice.
- All managers are responsible for overseeing the implementation of the Policy in the day-to-day delivery of services and collation of monitoring information. Managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the Policy and promote our aims and objectives with regard to equity and diversity.
- All colleagues have a responsibility to implement the Policy and work toward the provision of services that meet the goals and objectives of the Policy. All colleagues have a duty to act in accordance with this Policy and treat others accordingly at all times and not to discriminate against, harass or victimise other colleagues or young people, regardless of their status. In addition to this Policy, attention should be drawn to our separate policy and/or procedure on anti-bullying and harassment.

Colleagues who are involved in management or recruitment, or who have any questions about the content or application of this Policy, are encouraged to speak to their line manager to request training or further information.

5 Reviewing policy (and procedure)

Policies (and associated procedures) are reviewed regularly and in consultation with colleagues, Board, young people, Unison or other identified stakeholders as relevant, through:

- Team briefings, team meetings and development days
- Board / Committee meetings
- Independent People Ambassadors, 1625 Connects events and other young people's meetings as appropriate
- Stakeholder feedback processes

This Policy is reviewed regularly, particularly if there is relevant legislative change to incorporate, and responsibility for this lies with the SLT and the Head of People. The organisation is also committed to a comprehensive and thorough review every 3 years of its performance, policy and practice of ensuring equal opportunity and promoting anti-discriminatory practice.

We will continue to review the effectiveness of this Policy to ensure it is achieving its objectives. As part of this process, we monitor the composition of job applicants and career progression of our colleagues. Colleagues are invited to comment on this Policy and suggest ways in which it might be improved by contacting the People Team.

Our monitoring systems will collate information that will enable us to assess the effectiveness of the Policy and identify where changes need to be made, including making changes as a result of young people consultations, comments and complaints.

6 Data Protection compliance

All personal information generated in the course of the execution of this Policy is stored securely and confidentially and processed in line with our obligations under data protection legislation.

7 Links

This Policy links to all our policies and procedures which relate to our colleagues and young people.

8 Communication of policy

This Policy is available electronically and is accessible to all people involved with 1625IP. Communicating policy content occurs at induction for new starters or to everyone when a policy has been updated, e.g., via the Team Brief.

Where relevant, young people are given a summarised version at commencement of service and / or in the Young People's Handbook.

Main referrers will have a copy of this policy via their referral procedures. Other referrers can obtain a copy on request. Copies are displayed on colleague notice boards.

Copies are available on request.

If you would like this document in a different, more accessible format please ask.

9 Document history

Version #	Owner	Issued date	Date of next review
1-6	SLT	To 2020	December 2022
7	Head of People	December 2022	December 2025

1625 Independent People Equity, Diversity and Inclusion Procedure

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1 Procedure position

1.1 Purpose

This Procedure brings to life 1625 Independent People's (1625IP) commitment to quality, effectiveness and efficiency underpinned by equity for everyone referenced in section 3.1 below. It sets out the steps 1625IP take to accommodate the requirements of different religions, cultures, and domestic responsibilities, as well the diverse needs of the communities in which we work, which includes identifying and responding to the differing needs, backgrounds and requirements of young people, which incorporates fair access and exit from our services. Our approach to these issues is explained further in the relevant policies, as referred to in section 12 of this Policy.

1.2 Principles

1625IP aims to design and implement policies, procedures and related documentation, that meet the diverse needs of our young people and colleagues, ensuring that none are placed at a disadvantage over others. It takes into account the provisions of the Equality Act 2010, including the Public Sector Equality duty when contracts are funded by a public body, and advances equal opportunities for all. Further information on the Public Sector Equality duty can be found here [Public Sector Equality Duty | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/public-sector-equality-duty).

This document has been assessed to ensure that no one receives less favourable treatment due to the protected characteristics of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex (gender) or sexual orientation.

2 Statutory / regulatory considerations

2.1 Statutory A

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2.2 Regulatory B

- The UN Convention on the elimination of all forms of discrimination against women
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3 Scope and definitions

3.1 Scope

This Procedure covers all individuals working at all levels and grades, including managers, officers, directors, employees, consultants, contractors, trainees/apprentices, homeworkers, part-time and fixed-term employees, volunteers, interns, casual workers, Board members and agency staff (collectively referred to as *colleagues* in this policy). It also covers our young people and other organisations with whom we work. This Procedure does not form part of any employee's contract of employment and may be amended at any time.

3.2 Definitions

Discrimination: Discrimination by or against a colleague is prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out earlier in this document. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

Discrimination by association applies to age, race, religion or belief, sexual orientation, disability, gender reassignment, and sex. This is direct discrimination against someone because they associate with another person who has a protected characteristic.

Perception discrimination applies to age, race, religion or belief, sexual orientation, disability, gender reassignment, and sex. This is direct discrimination against an individual because others think they have a particular protected characteristic. It applies even if the person does not actually have that characteristic.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified. Another example could be the requirement of a lengthy period of local residence before an applicant can be considered for re-housing. In some areas, such a rule will disproportionately affect members of ethnic minority communities.

Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not have the relevant characteristic themselves. Employees are also protected from harassment because of perception and association. Harassment is unwanted conduct that has the

purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our *Anti-Harassment and Bullying Policy*.

Harassment by others applies to age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation. An employer can find themselves potentially liable for harassment of their employees by people who are not employees of their company, such as customers or clients. It is possible to be liable when unaware that harassment has taken place and having not taken reasonable steps to prevent it from happening again.

Victimisation is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

Institutional discrimination is the collective failure of an organisation to provide appropriate and professional treatment or service to people because they are part of a minority group. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and inappropriate stereotyping, which disadvantages people from minority groups.

A racist incident is any incident which is perceived to be racist by a victim or any other person.

4 Responsibility

The Strategic Leadership Team are responsible for:

- The effective operation of this Procedure.
- Implementation of this Procedure.

Recruiting managers are responsible for:

- Day-to-day operation for this Procedure and you should refer any questions about this Procedure to them in the first instance.

Colleagues with specialist roles involved in our recruitment processes:

- Day-to-day operation for this Procedure.

Colleagues are responsible for:

- Compliance with this Procedure.
- Raising questions about this Procedure where further information or clarity is needed.

5 Independent People as a service provider

5.1 Our commitments to you

1. We will periodically monitor and analyse applications, access and exit from our services, service quality and any complaints, comments and compliments to ensure, as far as possible, that discrimination does not occur.
2. We will not discriminate against an applicant for housing, support, information, advice or guidance services on the grounds of the source of the application or any protected characteristic.
3. Contractors or providers of services to 1625IP who harass, discriminate, victimise or prevent equity of opportunity to any of our colleagues or young people, including by protected characteristic - verbally, physically or by any other means - may have their contracts terminated and be removed from the Approved Contractors List.
4. We will assess equalities issues to avoid discrimination when developing services. We will develop an Equality Impact Assessment at the design stage and review it regularly, with partners as required, and at an appropriate frequency.
5. We will strive to provide an accessible environment for disabled people, including making access improvements where identified and practicable.
6. We will ensure that information about services is published as widely as possible and, in such formats, so as to encourage awareness amongst all young people and potential young people groups and relevant referral agencies.
7. We will continually review alternative ways of making service delivery more accessible.
8. We will foster good relations between people who share a protected characteristic and people who do not share it.
9. We will ensure equity when dealing with complaints, appeals, comments, compliments and requests for action.

10. We will work with partner agencies to improve equity of opportunity and/or tackle discrimination, harassment or victimisation where identified.
11. We will ensure that there is a planned approach to supporting victims of any form of abuse, harassment, discrimination or victimisation (see also Section 12 - links to related policies) in a planned way.
12. We will ensure that information is available to young people about culturally-specific services and about organisations and centres that provide services to protected characteristic and community groups.
13. We will take a multi-agency approach to preventing and tackling discrimination, harassment and victimisation.

5.2 Measuring our progress

As part of our commitment to continually improving performance we will:

1. Incorporate equalities into our procurement and delivery arrangements when not expressly prevented by legislation or statutory guidance.
2. Monitor the equalities profile of our young people, including applicants, and complete regular reviews of service access, exit, service quality, case review and complaints, comments and compliments against protected characteristic groups.
3. Review and report annually on our service delivery, or more frequently as required by contract.
4. Make sure all reports to our Board identify equity, diversity and inclusion implications and/or impact.

6 Independent People as a policy maker

1625IP is concerned that no policy discriminates directly or indirectly against any groups in our community. We will review policies, strategies and plans to ensure that they are fair.

6.1 Our commitments to you

We will:

1. Consider equalities as part of each policy deliberation and annual organisational strategy review, taking corrective action where appropriate.
2. As appropriate, develop an Equality Impact Assessment at policy design or review stage.

3. Promote and contribute to improving the awareness of equity in the communities and strategy groups as part of our strategic role, particularly with regard to the needs of young people.
4. Include the fostering of good relations between people who share a protected characteristic and people who do not share it in our policy work.
5. Use law, national guidelines and definitions to inform our practices.
6. Involve young people in design and review of policy.

6.2 Measuring our progress

As part of our commitment, we will manage our performance in the following ways:

1. Report annually on our service delivery.
2. Report to all external commissioners and funders as required.
3. To demonstrate our compliance with the Equality Act (2010), Public Sector Equality Duty (2011), we will provide, at the relevant frequency to public bodies with whom we work, relevant equality data or information for publication and input relevant, proportionate information into commissioners' strategic equality objectives. Published data will be provided in a way that makes it easy for people to access and understand it and will include specific and measurable actions that we will set ourselves and the periodic review and announcement of our equity objectives.
4. Transfer learning from our analyses, reports and feedback processes into better practice.

7 Independent People as an employer

7.1 Our commitments to you

We will maintain an environment where no individual is subject to discrimination, harassment or victimisation on the grounds of age, disability, gender reassignment, marital or civil partnership status, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex (gender) or sexual orientation. 1625IP is committed to a policy of equity both in the workplace and when recruiting employees (see *Recruitment Policy and Recruitment Procedure*) and will have employment practices that are fair and open.

We will:

1. Monitor and take action to ensure that employment policies and procedures are operated in such way that removes or minimises disadvantages suffered by people due to their protected characteristic.
2. Strive to ensure the workforce is appropriately representative of the young people we support and of the communities within which we work and seek to attract a wide range of applicants for posts at all levels in the organisation, advertising as widely as possible.
3. Endeavour to ensure the workplace is free from unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.
4. Work with colleagues to foster good relations between people who share a protected characteristic and people who do not share it, endeavouring to tackle prejudice and promote understanding between staff from different groups.
5. Strive to provide an accessible environment for disabled people, including making reasonable adjustments or access improvements where identified and practicable.
6. Offer relevant training and development for colleagues on a fair and equal basis.
7. Ensure colleagues are fully aware of this Policy, what it means for them and what responsibilities it entails, through induction, supervision and disciplinary or grievance procedures, where applicable.

7.2 Measuring our progress

As part of our commitment to maintaining and improving our performance, we will produce quarterly reports to the SLT and the Board and an Annual People Report for the People Committee that records the following, as appropriate to the type of report:

1. The composition of all full and part time employees, Relief Workers, volunteers and Board members by nationality, ethnic origin, religion, gender, sexual orientation, age and disability. If it is established that the workforce is not representative of the young people we support, steps will be made to undertake targeted recruitment for future roles.
2. The composition of all applicants, shortlisted applicants, appointed applicants, redeployment and internal promotions for vacancies by ethnic origin, religion, disability, sexual orientation, gender and age.

3. The composition of employees who raised a formal complaint via the policy and/or procedure on grievance by ethnic origin, religion, disability, sexual orientation, gender and age.
4. The composition of employees who have undergone a disciplinary investigation process under the policy and/or procedure on disciplinary by ethnic origin, religion, disability, sexual orientation, gender and age.
5. The composition of employees who have applied for flexible working under the policy and/or procedure on flexible working by ethnic origin, religion, disability, sexual orientation, gender and age, and the relevant outcomes.
6. Ill health absence levels including action taken to address these where relevant and what support measures, including adjustments, are implemented in individual cases.

We will maintain records of the following:

1. Advertisements for vacancies by date advertised, place advertised and whether the vacancy was advertised internally only or externally at the same time.

7.3 Recruitment and selection

We aim to ensure that no job applicant experiences discrimination because of any of the protected characteristics noted above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits, abilities and qualifications. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Shortlisting of applicants is done by more than one person.

Our job advertisements avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying. They include an appropriate short policy statement on equal opportunities and a copy of this Procedure, and the related Policy is available to download from our website.

We take steps to ensure that our vacancies are advertised to a diverse labour market, for example, through local press or targeted media and, where relevant, directly to particular groups that have been identified as disadvantaged or underrepresented in our organisation. Where appropriate, the Head of People may approve the use of lawful exemptions to recruit

someone with a particular protected characteristic - for example, where the job can only be done by a woman. The advertisement will specify the exemption that applies.

Applicants are not asked about health or disability before a job offer is made. There are limited exceptions, which should only be used with the approval of the People team. For example:

- a) Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- b) Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- c) Positive action to recruit disabled persons.
- d) Equal opportunities monitoring (which will not form part of the decision-making process).

Applicants are not asked about past or current pregnancy or future intentions related to pregnancy. Applicants are not asked about matters concerning age, race, religion or belief, sexual orientation or gender reassignment without the approval of the Head of People (who will first consider whether such matters are relevant and may lawfully be taken into account).

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status are not made based on appearance or apparent nationality. All prospective colleagues, regardless of nationality, are asked to produce original documents, such as a passport, before employment starts to satisfy current immigration legislation (see *Right to work in the UK guidance* - in recruitment sub-folder on our shared drive). The list of acceptable documents is available from the UK Border Agency.

To ensure that this Policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged at any stage of the recruitment process, we monitor the ethnic group, gender, disability, sexual orientation, religion and age of all applicants, those shortlisted and those successful at interview, as part of the recruitment procedure. Provision of this information is voluntary, and it does not adversely affect an individual's chances of recruitment, or any other decision related to their employment. This information

is not visible to the shortlisting panel and are securely stored on our Applicant Tracking System (ATS). Analysing this data helps us take appropriate steps to avoid discrimination and improve equity and diversity.

7.4 Training and promotion and conditions of service

Employee training needs are identified through our core training plan, as well as regular supervisions and Performance Development Reviews (PDRs). All employees are given appropriate access to training, to enable them to progress within the organisation, and all promotion decisions are made on the basis of abilities, merit and qualifications.

Workforce composition and promotions are regularly monitored to ensure equity of opportunity at all levels of the organisation. Where appropriate, steps are taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

Our conditions of service, benefits and facilities are reviewed regularly (accessible on the shared IT drive) to ensure that they are available to all colleagues, who should have access to them, and that there are no unlawful obstacles to accessing them.

7.5 Disability discrimination

Colleagues who are disabled or become disabled, are encouraged to tell us about their condition so that we can support them as appropriate.

Colleagues who experience difficulties at work because of their disability, are encouraged speak to their line manager about any reasonable adjustments that would help overcome or minimise the difficulty. Line managers may wish to consult with the colleague and our medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate our colleagues' needs. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or young people at a substantial disadvantage compared

to others. Where reasonable, we will take steps to improve access for disabled colleagues and young people.

7.6 Fixed term employees and agency workers

We monitor our use of fixed-term employees and agency workers, 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 to ensure that they are accessing permanent vacancies.

7.7 Part time work

We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately under our policy and/or procedure on flexible working.

7.8 Termination of employment

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory. We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

8 Complaints and breaches of this Procedure

Young people - if you believe that you may have been discriminated against or victimised, you are encouraged to raise the matter through our policy and/or procedure on feedback. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our policy and/or procedure on anti-harassment and bullying. If you are uncertain which applies or need advice on how to proceed you should speak to your support worker or a manager.

Colleagues - if you believe that you may have been discriminated against or victimised, you are encouraged to raise the matter through our policy and/or procedure on grievances. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our policy and/or procedure on anti-harassment and bullying. If you are

uncertain which applies or need advice on how to proceed you should speak to your line manager or another manager if you do not consider it appropriate to speak to your own line manager. We also operate a policy and/or procedure on concerns at work aimed to encourage colleagues to disclose information which relates to suspected wrongdoing or dangers at work.

Allegations regarding potential breaches of this Policy will be treated in confidence and investigated in accordance with the relevant procedure. Young people or colleagues who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made by colleagues in bad faith will, however, be dealt with under our policy and/or procedure on disciplinary.

Any young person who is found to have committed an act of discrimination, harassment or victimisation will be subject to action which could include notice on accommodation if you live with us or service closure if you receive a support service. Any colleague who is found to have committed an act of discrimination, harassment or victimisation will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this Policy.

9 Reviewing Procedure

Policies (and associated procedures) are reviewed regularly and in consultation with colleagues, Board, young people, Unison or other identified stakeholders as relevant, through:

- Team briefings, team meetings and development days
- Board / Committee meetings
- Independent People Ambassadors, 1625 Connects events and other young people's meetings as appropriate
- Stakeholder feedback processes

This Procedure is reviewed regularly, particularly if there is relevant legislative change to incorporate, and responsibility for this lies with the SLT and the Head of People. The organisation is also committed to a comprehensive and thorough review every 3 years of its performance, policy and practice of ensuring equal opportunity and promoting anti-

discriminatory practice. The responsibility for this lies with the Management Team and the Board members.

We will continue to review the effectiveness of this Procedure to ensure it is achieving its objectives. As part of this process, we monitor the composition of job applicants and career progression of our colleagues.

Colleagues are invited to comment on this Policy and suggest ways in which it might be improved by contacting the People Team.

Our monitoring systems will collate information that will enable us to assess the effectiveness of the Policy and identify where changes need to be made, including making changes as a result of service user consultations, comments and complaints.

10 Annual action plan

Each year we will develop an Equity, Diversity and Inclusion Annual Action Plan, which is agreed by the SLT and People Committee. The Plan will set down all action for the coming year that will help us to continually strive for better performance in all relevant policy areas and it will set out actions seeking to address any identified under representation or any areas of potential discrimination across the organisation (young people, employees/volunteers and Board members).

Our quality management systems include internal and external audits and performance measures. Any equalities actions arising from these will be added to the plan.

11 Data Protection compliance

All personal information generated in the course of the execution of this Procedure will be stored securely and confidentially and processed in line with our obligations under data protection legislation.

12 Links

This Procedure links to all our policies and procedures which relate to our colleagues and young people.

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This Procedure is available electronically and is accessible to all people involved with 1625IP. Communicating procedural content occurs at induction for new starters or to everyone when a procedure has been updated, e.g., via the Team Brief.

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Main referrers will have a copy of this procedure via their referral procedures. Other referrers can obtain a copy on request. Copies are displayed on colleague notice boards.

Copies are available on request.

If you would like this document in a different, more accessible format please ask.

14 Document history

Version #	Owner	Issued date	Date of next review
1-6	SLT	To 2020	December 2022
7	Head of People	December 2022	December 2025