

EQUALITY AND DIVERSITY POLICY

01 STATEMENT OF INTENT

- 01.1** Freedom Foundation is committed to the principles of equality and diversity.
- 01.2** Freedom Foundation recognises that individuals and groups experience many forms of oppression and is unreservedly opposed to any form of discrimination on the grounds of age, disability, mental ill-health, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation (defined as Protected Characteristics). This list is not exclusive and recognises that individuals may experience more than one form of oppression.
- 01.3** Freedom Foundation recognises and values people's differences and will assist them to use their talents to reach their full potential. Freedom Foundation values the variety of different views, outlooks and approaches that a diverse workforce brings. This assists us to provide improved services and increase our understanding of our participants. Freedom Foundation will do all we can to ensure no one will receive less favourable treatment or is to be disadvantaged by requirements or conditions, which cannot be shown to be justifiable.

02 AIMS OF THIS POLICY

- 02.1** This policy is designed to:

- A** Ensure that Freedom Foundation complies with its obligations under equality legislation and demonstrates our commitment to treating people equally and fairly.
- B** Ensure that Freedom Foundation will do all it can to ensure it recruits, trains and promotes people based on qualifications, experience and abilities for all roles within the organisation.
- C** Ensure that Freedom Foundation will do all it can to ensure it offers services to users based upon need, funding and resources available.
- D** Ensure that Freedom Foundation will use fair and objective employment and service delivery practices. The organisation aims to ensure that all employees, trustees, volunteers, participants and service providers:
 - O** Are treated fairly and with respect at all times.
 - O** Have the right to be free from harassment and bullying of any description, or any other form of unwanted behaviour.
 - O** Have an equal chance to contribute and to achieve their potential, irrespective of any defining feature that may give rise to unfair discrimination.
 - O** Have the right to be free from discrimination because they associate with another person who possesses a protected characteristic or because others perceive that they have a particular protected characteristic, even if they do not.

03 SCOPE OF THE POLICY

- 03.1** This policy applies to:

- A** Job applicants
- B** Employees

C Agency temps

D Students on work experience or placements

E Volunteers, including trustees

F Participants

G Service Providers

03.2 The policy applies to all stages of employment or involvement with Freedom Foundation, including recruitment and selection, promotion and training, assessment and service delivery.

04 DEFINITIONS

04.1 **DIRECT DISCRIMINATION** - This is when an employee, trustee, volunteer, service user, service provider or applicant is treated less favourably than someone else because of their: age, disability, mental ill-health, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and that there is no genuine occupation requirement for it. People also must not be discriminated against because they are on a part-time or fixed-term contract.

04.2 **INDIRECT DISCRIMINATION** - This is where there is a working condition, practice or rule that disadvantages one group of people more than another. In other words, it is more difficult for people from one group to comply with the requirement. Even if it is done accidentally, indirect discrimination is unlawful. Indirect discrimination is only allowed if it is necessary for the way the business works, and there is no other way of achieving it.

04.3 **DISCRIMINATION ARISING FROM DISABILITY** - This is where a disabled person is treated unfavourably because of something connected to their disability, where it cannot be objectively justified. This only applies where the organisation knew or could reasonably be expected to know that the person was disabled.

04.4 **ASSOCIATIVE DISCRIMINATION** - This is where someone is treated less favourably than someone else because they are associated with someone with a protected characteristic.

04.5 **PERCEPTIVE DISCRIMINATION** - This is where someone is treated less favourably than someone else because there has been an incorrect assumption that they have a protected characteristic. This applies even if the person does not possess the characteristic.

04.6 **THIRD PARTY HARASSMENT** - This is where an employee, volunteer or service provider is harassed by a third party who is not an employee, e.g., volunteers or participants. The organisation becomes liable if it has happened on at least two occasions and if it is aware that harassment took place, but it has not taken steps to prevent it happening again.

05 RESPONSIBILITIES

05.1 Whilst Freedom Foundation is potentially liable for any discriminatory acts carried out by its employees, volunteers, trustees or service providers, under equality legislation, the individual who carries out the discriminatory act can also be personally liable.

05.2 Employees, trustees, volunteers and service providers of Freedom Foundation have a duty to act within this policy, ensure it is followed and to draw attention to any suspected discriminatory acts or practices.

05.3 Responsibility for promoting awareness of this policy and monitoring that it is being followed rests with Freedom Foundation's Management Team and Trustees.

06 BREACHES OF THE EQUALITY AND DIVERSITY POLICY BY EMPLOYEES

- 06.1** Breaches of this policy by employees may be dealt with under the disciplinary procedures.
- 06.2** Breaches of the Equality and Diversity Policy by volunteers (including trustees) may jeopardise your position as a volunteer.
- 06.3** Breaches of this policy by service providers may be dealt with under the Service Provider Non-Compliance procedures.

07 EQUALITY AND DIVERSITY IN PRACTICE

- 07.1** To support the Equality and Diversity Policy, Freedom Foundation will carry out the following actions in our practice:
 - A** Use selection criteria that does not unlawfully discriminate in recruitment and promotion procedures.
 - B** Require entry to employment/volunteering or progression within it to be based on merit.
 - C** Not discriminate in opportunities for recruitment, training or promotion of employees or volunteers.
 - D** Ensure that every individual is assessed according to his or her personal capability to carry out a given job/role.
 - E** Ensure that all employees are given equal treatment with regard to terms and conditions of employment, provided they do the same or broadly similar work, or work of equal value.
 - F** Ensure equal opportunities and non-discrimination in the operation of grievance and disciplinary procedures.
 - G** Promote a working culture of equality, where harassment and discrimination are not tolerated.
 - H** Where the needs of the service allow, provide flexible working arrangements for all employees.
 - I** Actively promote services and when necessary, target particular individuals or groups.
 - J** Where appropriate ensure services are tailored to individual needs and that individuals are involved in the decisions made.
 - K** Ensure our services are accessible to all where criteria, funding and resources permit.
 - L** Actively design services to reflect and meet the needs of the local community.
 - M** Ensure that all relevant requirements of the Equality Act 2010 in relation to disability are met and adhered to. This will include making reasonable adjustments to ensure access to employment or volunteering tasks and opportunities.
 - N** Challenge language and behaviour that is in opposition to this policy.
 - O** Ensure that any amendments to any legislation relating to discrimination are met and adhered to.
- 07.2** Implementation of the policy
 - A** All staff, trustees, volunteers and service providers will be involved in creating and maintaining an environment that values and promotes equality and diversity.

08 COMMUNICATIONS

- 08.1** This policy will be communicated to job applicants, employees, volunteers and service providers through:
- A** Making available a copy of the policy to prospective applicants.
 - B** Ensuring all new starters have the opportunity to discuss the policy with line managers/colleagues.
 - C** Making use of team meetings to discuss the policy and defining areas where practice could be improved.
 - D** Providing non-discriminatory selection training for managers who are recruiting.
 - E** Providing Equality and Diversity training and guidance to staff and volunteers (including trustees).
 - F** Including reference to abiding by the policy in staff terms and conditions/volunteer agreements.
- 08.2** In selecting our partners, we will consider their commitment to Equality and Diversity by:
- A** Asking to see their policy.
 - B** Asking what they do in practice, including monitoring the policy.
- 08.3** We will make our services accessible by:
- A** Considering formats for promotional material.
 - B** Appropriate use of language/formats/fonts/size.
 - C** Considering whether information should be available in alternative formats e.g., easy read/other languages.
 - D** Considering locations where the organisation's services are promoted/advertised.
 - E** Considering accessibility of locations from which the service is provided.
 - F** Considering the diverse make up of our staff/volunteers in relation to our participants.
 - G** Considering the impact of proposed new services on the user group.
- 08.4** This policy will be monitored to judge how effectively it is working and to identify areas for improvement. Monitoring will relate to both employees/volunteers and to participants. Monitoring methods will include:
- A** Capturing diversity data against recruitment/promotion/training/leavers/participants for consideration by Freedom Foundation's management team. The data will be anonymised to comply with Data Protection legislation.
 - B** The information gathered will be considered in relation to baseline population statistics for catchment areas/other participants/other similar organisations.
 - C** Conducting an Equality Impact Assessment every two years which will be considered by Freedom Foundation's management team and trustees.

09 REPORTING DISCRIMINATION/POTENTIAL DISCRIMINATION

- 09.1** Employees, volunteers and service providers who feel that they have suffered any form of discrimination should raise the issue with their line manager. Where their line manager be implicated the issue should be raised with their line manager's peer. Where a director is implicated the issue should be raised with the non-executive director.

- 09.2** Directors who feel that they have suffered any form of discrimination should raise the issue with the non-executive director. Where the non-executive director is implicated the issue should be raised with the director.
- 09.3** Participants who feel that they have suffered any form of discrimination should refer to Freedom Foundation's Complaints Policy.
- 09.4** Employees, trustees, volunteers, participants and service providers should also use this approach if they feel that they have been the subject of harassment from someone who is not an employee of Freedom Foundation. Freedom Foundation will not tolerate any harassment from third parties towards its employees, trustees, volunteers, participants and service providers and will take appropriate action to prevent it happening again.
- 09.S** If an employee, trustee, volunteer, service user or service provider witnesses behaviour that they find offensive in relation to age, marriage or civil partnership, pregnancy and maternity, disability, gender reassignment, race, religion or belief, sex and sexual orientation, even if it is not directed at them, they should also use this procedure.
- 09.6** All complaints will be treated seriously, promptly and confidentially.

10 LEGISLATION

- 10.1** Freedom Foundation policies and procedures will comply with the following legislation and codes of practice and abides by these and any subsequent amendments or re-enactments:
- A** The Equal Pay Act 1970
 - B** The Sex Discrimination Act 1975 (1986)
 - C** The Race Relations Act 1976 (as amended)
 - D** The Disability Discrimination Act 1996
 - E** Provision under the Rehabilitation of Offenders Act 1974
 - F** Human Rights Act 1998
 - G** The Commission for Racial Equality (CRE) Code of Practice for the elimination of discrimination and the promotion of opportunity in employment
 - H** Women's Aid Federation England
 - I** Equality Delivery System for the NHS (EDS2)
 - J** Equality Act 2010

11 REVIEW

- O** We keep this policy under regular review.
- O** Review of this Policy: Jan 2025
- O** Next Review Date: Jan 2026
- O** Reviewed By: Laura Grant
- O** Position/Role: Director of Freedom Foundation