

Equality, Diversity, and Inclusion Policy

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**for a
better
tomorrow**

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Introduction

Our Equality, Diversity & Inclusion Policy sets out our intentions and how we will achieve them with regards to treating everyone fairly and with due sensitivity to their individual needs.

Get Set UK recognises the importance of the Equality Act 2010 and the related Public Sector Equality Duty and is committed to have due regard to the need to the three aims of the general duty:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- 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

Get Set UK is also committed to a culture that actively values difference and recognises that people with different backgrounds, cultures, perspectives and experiences can bring valuable insights to the workplace and enhance the way we work. At Get Set UK, we are guided by our values in everything we do, and we recognise that being a diverse and inclusive employer helps us to also make a difference for our customers, learners, employers, funders and key stakeholders.

Get Set UK is also committed to providing equal opportunities throughout employment, including in the recruitment, training and development of employees, and to pro-actively tackling and eliminating discrimination.

At Get Set UK we consider that equality means breaking down barriers, eliminating discrimination and ensuring equal opportunities and access for all groups, both in employment and in the services that we deliver. We consider diversity to mean celebrating difference and valuing everyone. Each person is an individual with visible and non-visible differences and, by respecting this, everyone can feel valued for their contributions, which is beneficial not only for the individual but for Get Set UK too. We acknowledge that equality and diversity are not inter-changeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed.

Purpose

This policy sets out Get Set UK’s approach to equality and diversity. Get Set UK is committed to promoting equality of opportunity and avoiding unlawful discrimination for all employees, potential employees and our customers/learners. This policy applies to all matters of employment and

recruitment, and the treatment of customers and learners on our programmes.

The aim of this Equality, Diversity & Inclusion (EDI) Policy is to ensure that no customer, learner, job applicant or employee receives less favourable treatment on any grounds or conditions that cannot be justified. These include direct or indirect discrimination on the grounds of age, gender, disability, race, colour, nationality, ethnic or national origins, marital status, sexual orientation, family responsibility, trade union activity, class, political or religious beliefs or offending background.

This Policy gives full consideration to the requirements and intent of the Equality Act 2010, which consolidated previous equal opportunities legislation, plus the Rehabilitation of Offenders Act 1974 and the Human Rights Act 1998. Get Set UK will also abide by the statutory Code of Practice on Employment issued by the Equality and Human Rights Commission which aims to promote equality of opportunity and eliminate discrimination, and any non-statutory guidance.

Get Set UK's CEO, Thomas Harley, has overall responsibility for the implementation, operation, monitoring and review of this policy. The day-to-day operation of the policy is the responsibility of the Head of HR & Learning and Organisational Development, assisted by Avensure, Get Set UK's external HR Advisers, and Get Set UK's internal Equality Diversity and Inclusion Lead.

Scope

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Get Set UK will be based on merit, qualifications and abilities. Get Set UK does not discriminate in employment opportunities or practices on the basis of any characteristic protected by law. Get Set UK expects all employees, of whatever seniority, to abide by and adhere to this general principle. Discrimination is prohibited by the Equality Act 2010 on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Furthermore, Get Set UK does not discriminate directly or indirectly in the provision of services to customers or learners and will make whatever reasonable adjustments are necessary to overcome barriers to using its services caused by disability.

Get Set UK will make reasonable adjustments to working arrangements and/or physical premises to accommodate employees and customers/learners with disabilities. A separate Disability Policy sets out Get Set UK's approach towards employing people with disabilities.

The rights and obligations set out in this policy apply equally to all employees and associated persons such as interns, individuals on work-experience/work trials, contractors and others employed under a contract of service.

Access to this policy

This document will be made available to any employee, learner, customer, visitor or additional stakeholder that requests to see it. The policy will be available in either hard copy or electronic format.

Get Set UK's Commitment

Every employee is entitled to a working environment that promotes dignity, equality and respect for all. Get Set UK will not tolerate any acts of unlawful or unfair discrimination (including bullying or harassment) committed against an employee, job applicant, learner, customer, contractor or visitor because of a protected characteristic:

- Age
- Disability
- Gender reassignment
- Sex
- Religion or belief
- Pregnancy and maternity
- Marriage and civil partnership
- Race (including ethnic origin, nationality and national origin)
- Sexual orientation.
- Discrimination on the basis of work pattern (part-time working, fixed term contract, flexible working) will also not be tolerated.

All employees will be encouraged to develop their skills and fulfil their potential and to take advantage of training, development and progression opportunities at Get Set UK. Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability.

No form of intimidation, bullying or harassment will be tolerated. If you believe that you may have suffered discrimination because of any of the above protected characteristics, you should consider the appropriateness and feasibility of attempted informal resolution by discussion in the first instance with your line manager or another colleague in a relevant position of seniority. Alternatively, you may decide to raise the matter through Get Set UK's Anti-Harassment and Bullying Policy or Grievance Policy. For types of unlawful discrimination see Annex 1 to this policy.

A person found to have breached this policy may be subject to disciplinary action under Get Set UK's Disciplinary Policy.

Employees may also be personally liable for any acts of discrimination prohibited by this policy that they commit, meaning that they can be sued by the victim.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the appropriate procedure. Get Set UK will ensure that individuals who make such allegations in good faith will not be victimised or treated less favourably by Get Set UK as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under Get Set UK's Disciplinary Policy.

When does this policy apply?

This policy governs all aspects of employment, including recruitment, selection, promotion, transfer, compensation, discipline, termination and access to benefits and training. This policy applies to all conduct in the workplace and also to conduct outside of the workplace that is related to your work (e.g. at meetings, social events and social interactions with colleagues) or which may impact on Get Set UK's reputation (e.g. the expression of views on social media that are contrary to the commitments expressed in this policy and that could be linked to Get Set UK). It also covers all areas of service design and delivery including any sub-contracted delivery.

Key areas include:

1. Recruitment:

Selection for employment at Get Set UK will be on the basis of aptitude and ability. Further detail is set out in Get Set UK's Recruitment and Selection Policy. Where possible, Get Set UK will capture applicants' diversity demographics as part of its recruitment processes to promote the elimination of unlawful discrimination. The intention of Get Set UK's recruitment and selection procedures is to ensure that the highest quality candidates are appointed. Therefore, the selection process is of crucial importance and will be carried out according to objective job-related criteria. Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment will be assessed objectively against these requirements, taking account of any reasonable adjustments that may be required for candidates with a disability. Get Set UK will ensure that all employees making recruitment and selection decisions receive the appropriate training. All advertisements for staff will make reference to the EDI Policy.

2. Training

Training is acknowledged as an essential factor in the achievement of equal opportunities in employment. All managers will consider the implications of the Policy when developing and implementing training strategies and plans. Relevant job training opportunities will be made available to all employees. Every employee will have the opportunity to identify and agree with their line manager training and development needs through the performance management process and these will be recorded in an individual Personal Development Plan.

Get Set UK will provide training on equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise. In addition, training will be provided to existing and new employees to help them understand their rights and responsibilities under the Anti-Harassment and Bullying Policy and what they can do to help create a work environment free of bullying and harassment.

3. Promotion

All promotion decisions will be made on the basis of merit and will not be influenced by any of the protected characteristics listed above. Promotion opportunities will be monitored to ensure equality of opportunity at all levels. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to promotion.

4. During Employment

The benefits, terms and conditions of employment and facilities available to Get Set UK employees will be reviewed on a regular basis to ensure that access is not restricted by unlawful means and to provide appropriate conditions to meet the special needs of disadvantaged or under-represented groups. Get Set UK will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if it considers it has good reasons for doing so, which will be unrelated to any prohibited ground of discrimination.

5. Service Design and Delivery

Get Set UK 's customers, learners, additional stakeholders and visitors can expect Get Set UK to:

- Design and deliver appropriate, accessible, and effective services for all members of the community.
- Provide clear and accessible information about our provision in a variety of appropriate formats, which meets the needs of all members of the community.
- Use of effective systems for challenging, reviewing and monitoring our provision and to ensure that quality and equality are continuously evaluated and improved and to ensure that all sections of the community are receiving fair access and outcomes.
- Ensure that all our employees understand what equality in service provision means by providing specific training (based upon need).
- Engage with and listen to all sections of the community in identifying needs and communicating ideas on the way Get Set UK delivers its provision.
- Monitor and evaluate service up-take in relation to age, disability, gender and race.

6. Procurement and Contracting

To ensure best practice and in an effort to promote our values Get Set UK will:

- Ensure that contractors and supply chain partners are aware of our position on equality and are clear about their obligation to provide services that are free from discrimination, harassment or victimisation.
- Recognise and promote the application of national guidelines and advice, in line with our own contracting and sub-contracting procedures.
- Make sure that our tendering, selection and sub-contractor management processes positively address and include equality considerations that are in line with the procedures mentioned above.
- Maintain Disability Confident Employer status to demonstrate our commitment to equality and inclusion.
- Provide training for relevant staff in equalities issues for procurement.

Implementation - A shared responsibility

Within Get Set UK, all employees have a part to play in challenging discrimination and in implementing this policy. If anyone witnesses a discriminatory incident at work, they have a duty of care to others to challenge such behaviour and practice.

The Chief Executive is responsible for providing leadership in the implementation of this policy. All employees are responsible for promoting equality and are accountable to the senior management and the trustees for ensuring equality of opportunity and respect for diversity in all Get Set UK provision, services and employment.

All Directors, Heads of Departments and Management Teams are responsible for implementing the policy in their service areas, allocating specific resources to ensure the delivery of equality objectives in relation to service provision and employment. They are responsible for ensuring that their employees are adequately informed, trained and supported to ensure that their duties are carried out in accordance with this policy.

All managers and team leaders are responsible for implementing the equality in service provision and employment and for providing support for employees to work together to achieve equality. The Quality and Compliance Team will be responsible for co-ordinating the development, implementation, review and evaluation of this policy.

All employees are responsible for ensuring that they play their part in implementing this policy. They will also be responsible for improving their awareness of the barriers to equality in service provision and employment, for working towards the elimination of these barriers and for performing their duties in accordance with this policy. This expectation will be communicated to all new staff via organisational induction.

Any Contractors, Partners and Suppliers (sub-contractors) are to be made aware of our position on equality and be clear about their obligations to provide services that are free from discrimination, harassment and victimisation. Failure to abide by these requirements will be treated as a serious breach of trust and commitment.

The Policy is published on Get Set UK's shared drive, which is accessible to all staff. A summary appears in the employee handbook and the responsibility of all employees to adhere to the Policy is reinforced with a specific clause in contracts of employment. Get Set UK's commitment to equality, diversity and inclusion is discussed with new employees when they commence employment and during their induction programme.

Equality, Diversity and Inclusion are also discussed at regular senior management and executive team meetings.

Any employee or customer/learner who feels this policy has not been adhered to, has the right to have their case considered in accordance with Get Set UK's recognised grievance or complaints procedure.

Any breach of this policy will be dealt with through the Get Set UK disciplinary procedures. Serious offences such as direct discrimination, harassment or victimisation will be treated as misconduct or gross misconduct and in extreme cases may result in dismissal.

Grievances

If any employee considers that they have been unlawfully discriminated against, they may use the grievance procedure to make a complaint. Get Set UK will take any complaint seriously and will seek to resolve any grievance which it upholds. Employees will not be penalized for raising a grievance, even if this is not upheld unless it was both untrue and made in bad faith.

Feedback

Get Set UK welcomes feedback (comments, compliments and complaints) on how well we are implementing this policy in the services we deliver to the local community. For general comments and compliments, or if you believe that you have been the subject of unlawful discrimination, harassment or victimisation by Get Set UK will then you should first contact the centre manager.

If you believe that an employee has unlawfully discriminated against someone or failed to treat someone with respect then you should contact either the relevant Head of Department or the Chief Executive.

Any allegations of this nature will be taken very seriously, investigated and appropriate action taken

Monitoring

To ensure that the success of the Policy can be assessed, Get Set UK has introduced a system of monitoring. Applicants for jobs are invited to complete a Diversity Monitoring Form, providing details of gender, ethnicity, disability, and age. This information is also held for existing employees. The data is held confidentially within the HR Department and reviewed regularly by the senior management team to check that recruitment and other employment practices are facilitating the development of a diverse workforce that is also reflective of Get Set UK's client base. Get Set UK will consider and take appropriate action to address any problems which may be identified as a result of the monitoring process.

Grievances, disciplinary action, performance reviews and terminations of employment for whatever reason will also be monitored to prevent unlawful discrimination and changes introduced if they are found to pose a potential or actual risk of unlawful discrimination.

The effectiveness of the EDI Policy and all of Get Set UK's employment practices will be continuously reviewed against the objectives laid out in this policy and in the light of information obtained as a result of monitoring. If changes are required, Get Set UK will implement them.

Key monitoring activities will include:

- Annual Equality Impact Assessments on policies, procedures and service provision.
- Engaging with, and listening to, the views of our local communities, learners, customers, and stakeholders to assist in the development of our future equality agenda through feedback requests and opportunities.
- An EDI Delivery Plan with appropriate targets and timescales to demonstrate what Get Set UK is doing to achieve equality of opportunity. The effectiveness of the Policy and Plan will be monitored regularly and a progress report produced annually and published on the shared drive, and through e mail and team briefings. Where required, separate contracts and grant agreements will have project specific EDI plans, that will be aligned with Get Set UKs overarching organisational EDI plan.

Get Set UK's legal duties

Get Set UK implements its responsibilities as set out in the Equality Act 2010. The Equality Act was introduced on 1st October 2010. Get Set UK will ensure that policies and procedures are compliant with any forthcoming legislation; Codes of Practice and guidance published by national equalities bodies and Commissions. This policy will be reviewed annually (as a minimum) by Get Set UK to assess its effectiveness and may be amended from time to time.

Related Policies and Procedures

- Complaints Policy
- Disability Policy
- Disciplinary Policy
- Anti-Harassment and Bullying Policy
- Recruitment and Selection Policy
- Whistleblowing Policy

- Grievance Policy
- Employee Conduct segment of employee contract

Related Legislation

- Equality Act 2010 <https://www.legislation.gov.uk/ukpga/2010/15/contents>

Policy Review

This policy shall be reviewed annually and amended accordingly at intervals not exceeding 12 months.

Version Control

Version	Date	Purpose / Changes	Author
2019-20 V5	May 2019 / May 2020	Annual review	Thomas Harley
2021 V6	May 2021	Annual review	Shabana Ghori
2021 V7	September 2021	Full policy review: order of policy sections changed, examples of unlawful discrimination moved to annex	Cat Barton
2023 V9	September 2023	Full policy review:	Cat Steel

EQUALITY, DIVERSITY & INCLUSION DECLARATION:

I have read and understood Get Set UK's **Equality, Diversity & Inclusion Policy** and agree to work to the expected standards. I agree to treat all colleagues, customers/learners and visitors with respect and dignity while carrying out the duties and responsibilities of my role at Get Set UK.

Signature.....

Date.....

Print name.....

ANNEX 1 - Types of Unlawful Discrimination

Discrimination can be direct, indirect, associative, perceptive, intentional or unintentional, and can be caused by individuals, groups or institutions. Examples of the main types are:

1. Direct discrimination

Direct discrimination occurs where one person is treated less favourably than another because of a protected characteristic set out in this policy. By way of example, refusing to promote a pregnant employee on the basis that she is shortly due to go on maternity leave would be direct discrimination on the protected characteristic of the employee's sex. Other types of direct discrimination are:

- **Associative discrimination** - this is direct discrimination against someone because they associate with another person who possesses a protected characteristic. For example, an employee is discriminated against because his/her son is disabled.
- **Perceptive discrimination** - this is direct discrimination against an individual because others think they possess a particular protected characteristic. For example, where co-workers believe the individual is gay. It applies even if the person does not actually possess that characteristic.

2. Indirect discrimination

Indirect discrimination occurs when an unjustifiable requirement or condition is applied, which appears to be the same for all but which has a disproportionate, adverse effect on one group of people. This is discrimination even though there was no intention to discriminate. For example, a requirement for UK based qualifications could disadvantage applicants who have obtained their qualifications outside of the UK; this could amount to indirect discrimination on the grounds of race.

3. Victimisation

Victimisation is where an employee is treated less favourably than others because they have asserted legal rights against Get Set UK or assisted a colleague in doing so. For example, victimisation may occur where an employee has raised a genuine grievance against Get Set UK and is demoted as a result.

4. Harassment

Harassment is “*unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.*” It is important to remember that it is not the intention of the harasser but how the recipient perceives their behaviour, which determines whether harassment has occurred. Please see Get Set UK's Anti-Harassment and Bullying Policy, for further details of how Get Set UK will deal with harassment and bullying.

5. Third-party harassment

Third-party harassment occurs where an employee is harassed and the harassment is related to a

protected characteristic, by third parties such as clients or customers.

6. Victimisation

Victimisation occurs where someone is subjected to detrimental treatment because he or she has alleged unlawful discrimination or supported someone else to make a complaint.

7. Failure to make reasonable adjustments

Failure to make reasonable adjustments is where arrangements that disadvantage an individual because of a disability are not adjusted where it would be reasonable to do so.

8. Exceptions:

There are instances when the law allows for people to be treated differently. This is when a particular requirement or condition is objectively justifiable, e.g. where the holder of the job provides individuals with personal services and those services can only be provided by a particular sex or the same racial group.