



EQUALITY & DIVERSITY POLICY

- **INTRODUCTION**

- 1) We are an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.
- 2) We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. All employees are covered by this policy and it applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.
- 3) The **Designated officer** has particular responsibility for implementing and monitoring the Equality and Diversity Policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.
- 4) All employees, workers or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Company.
- 5) Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Company as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of every employee to this policy and application of its principles are essential to eliminate discrimination and provide equality throughout the Company.

- **OUR COMMITMENT AS AN EMPLOYER**

- 1) To create an environment in which individual differences and the contributions of our staff are recognised and valued.
- 2) Every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- 3) Training, development and progression opportunities are available to all staff.

- 4) Equality in the workplace is good management practice and makes sound business sense.
- 5) We will review all our employment practices and procedures to ensure fairness.

- **OUR COMMITMENT AS A SERVICE PROVIDER**

- 1) We aim to provide services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities or social class.
- 2) We will make sure that our services are delivered equally and meet the diverse needs of our service users and clients by assessing and meeting the diverse needs of our clients.
- 3) This policy is fully supported by senior management and has been agreed with employee representatives.
- 4) This policy will be monitored and reviewed annually.
- 5) We have clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.
- 6) Breaches of our Equality and Diversity Policy will be regarded as misconduct and could lead to disciplinary proceedings.

- **POLICY STATEMENTS**

AGE

We will:

- ensure that people of all ages are treated with respect and dignity;
- ensure that people are given equal access to our employment, training, development and promotion opportunities; and
- challenge discriminatory assumptions about younger and older people.

DISABILITY

We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities;
- challenge discriminatory assumptions about disabled people; and
- seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation.

RACE

We will:

- challenge racism wherever it occurs;
- respond swiftly and sensitively to racist incidents; and
- actively promote race equality in the Company.

GENDER

We will:

- challenge discriminatory assumptions about gender;
- take positive action to redress the negative effects of discrimination against everyone;

- offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same; and
- provide support to prevent discrimination against transgender people who have or who are about to undergo gender reassignment.

SEXUAL ORIENTATION

We will:

- ensure that we take account of the needs of everyone, including the LGBTQ+ communities; and
- promote positive images of the LGBTQ+ communities.

RELIGION OR BELIEF

We will:

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible; and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

PREGNANCY OR MATERNITY

We will:

- Ensure that people are treated with respect and dignity during pregnancy and during maternity leave;
- challenge discriminatory assumptions about pregnancy and maternity leave; and
- ensure that no individual is disadvantaged as a result of pregnancy or maternity leave and that we take account of the needs of our employees during pregnancy and during maternity leave.

MARRIAGE OR CIVIL PARTNERSHIP

We will:

- Ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- challenge discriminatory assumptions about the marriage or civil partnership of our employees; and
- ensure that no individual is disadvantaged as a result of their marriage or civil partnership status.

EQUAL PAY

We will:

- ensure that all employees have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

A) LAWFUL BASES OF PROCESSING

We acknowledge that processing may only be carried out where a lawful basis for that processing exists and we have assigned a lawful basis against each processing activity.

Where no other lawful basis applies, we may seek to rely on the employee's consent in order to process data.

However, we recognise the high standard attached to its use. We understand that consent must be freely given, specific, informed and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate. Employees will be given clear instructions on the desired processing activity, informed of the consequences of their consent and of their clear right to withdraw consent at any time.

B) ACCESS TO DATA

As stated above, employees have a right to access the personal data that we hold on them. To exercise this right, employees should make a Subject Access Request. We will comply with the request without delay, and within one month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded or excessive, or unless a request is made for duplicate copies to be provided to the employee making the request or to a third party acting on the employee's behalf. In these circumstances, a reasonable charge will be applied.

Further information on making a subject access request is contained in our Subject Access Request policy.

C) DATA DISCLOSURES

The Company may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

- a) any employee benefits operated by third parties;
- b) disabled individuals - whether any reasonable adjustments are required to assist them at work;
- c) individuals' health data - to comply with health and safety or occupational health obligations towards the employee;
- d) for Statutory Sick Pay purposes;
- e) HR management and administration - to consider how an individual's health affects their ability to do their job;
- f) the smooth operation of any employee insurance policies or pension plans;
- g) to assist law enforcement or a relevant authority to prevent or detect crime or prosecute offenders or to assess or collect any tax or duty.

These kinds of disclosures will only be made when strictly necessary for the purpose.

D) DATA SECURITY

All our employees are aware that hard copy personal information should be kept in a locked filing cabinet, drawer, or safe.

Employees are aware of their roles and responsibilities when their role involves the processing of data. All employees are instructed to store files or written information of a confidential nature in a secure manner so they are only accessed by people who have a need and a right to access them and to ensure that screen locks are implemented on all PCs, laptops etc when unattended. No files or written information of a confidential nature are to be left where they can be read by unauthorised people.

Where data is computerised, it should be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Employees must always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them.

Personal data relating to employees should not be kept or transported on laptops, USB sticks, or similar devices, unless prior authorisation has been received. Where personal data is recorded on any such device it should be protected by:

- a) ensuring that data is recorded on such devices only where absolutely necessary.
- b) using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted.
- c) ensuring that laptops or USB drives are not left where they can be stolen.

Failure to follow the Company's rules on data security may be dealt with via the Company's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

E) THIRD PARTY PROCESSING

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

F) INTERNATIONAL DATA TRANSFERS

The Company does not transfer personal data to any recipients outside of the EEA.

G) REQUIREMENT TO NOTIFY BREACHES

All data breaches will be recorded on our Data Breach Register. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

More information on breach notification is available in our Breach Notification policy.

H) TRAINING

New employees must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

The nominated data controller/auditors/protection officers for the Company are trained appropriately in their roles under the GDPR.

All employees who need to use the computer system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and the Company of any potential lapses and breaches of the Company's policies and procedures.

I) RECORDS

The Company keeps records of its processing activities including the purpose for the processing and retention periods in its HR Data Record. These records will be kept up to date so that they reflect current processing activities.

J) DATA PROTECTION COMPLIANCE

Our Data Protection Officer is:

Sheila Johnson (Name)

Sheila@SNA247supportservices.org(Contact details).
