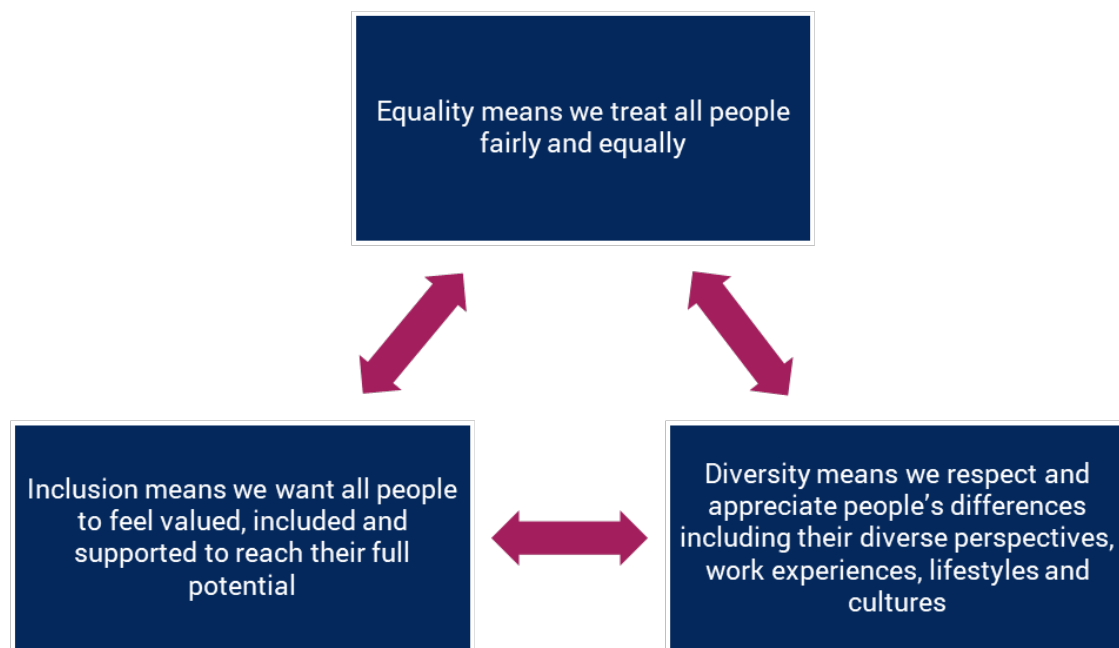


# Equality, Diversity and Inclusion Policy



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## 1. Statement

- a) Cambridge House pursues a vision of a society without poverty where all people are valued, treated equally and lead fulfilling and productive lives.
- b) We believe that:
  - i) Equality, diversity and inclusion are essential characteristics of a just and democratic society.
  - ii) We live in a beautifully diverse but sadly unequal society.
  - iii) Over and above the minimum standards required by law, it is our ethical and moral duty to:
    - Champion equality, diversity and people’s rights
    - Challenge discrimination, prejudice and intolerance
    - Tackle barriers to social inclusion
  - iv) When people from diverse backgrounds are involved in creating our services we deliver better services that work for everyone.
  - v) Delivering equality, diversity and inclusion is everyone’s responsibility and to everyone’s benefit.
- c) Equality, diversity and inclusion are therefore core values and at the heart of everything we do.

## 2. Governance framework

- a) Principle

The Council of Management works to ensure it has a clear, agreed and effective approach to supporting equality, diversity and inclusion throughout the organisation and in its own practice. This approach supports good governance and the delivery of the organisation’s charitable purposes.
- b) Rationale
  - i) Addressing equality, diversity and inclusion helps our Council of Management to make better decisions. This requires commitment, but it means that we are more likely to stay relevant to those we serve and to deliver our public benefit. Recognising and countering any imbalances in power, perspectives and opportunities in Cambridge House, and in the attitudes and behaviour of trustees, staff and volunteers, helps to make sure that we achieve our aims.
  - ii) All trustees (who are also Directors for the purposes of company law) have the same responsibility for Cambridge House, so they must have equal opportunity to contribute to decision making. Council of Management diversity, in the widest sense, is important because it creates more balanced decision making. Where appropriate, this includes and centres the communities and people we serve. This increases the Cambridge House’s legitimacy and impact. Equality and diversity are only effective and sustainable if the Council of Management works to be inclusive, ensuring that all trustees are welcomed, valued and able to contribute.
  - iii) By ensuring our trustees commit to equality, diversity and inclusion we are more likely to set a positive example and tone for Cambridge House by following an appropriate strategy for delivering our purpose and setting inclusive values and culture.

- d) Key outcomes
  - i) The principles of equality, diversity and inclusion are embedded in Cambridge House and help to deliver the charity's public benefit.
  - ii) Obstacles to participation are reduced, with the organisation's work designed and open for everyone included within its charitable purposes. This supports Cambridge House to challenge inequality and achieve improved equality of outcomes.
  - iii) The Council of Management is more effective because it reflects different perspectives, experiences and skills, including, where applicable, from current and future service users.

### 3. Legal framework

- a) The law gives protection against discrimination at work and in the provision of services. Legislation gives us guidelines on how we should act and standards for how we should treat people as employees and service users.
- b) The Equality Act 2010 (**The Act**) specifically protects people defined by nine areas known in law as protected characteristics:
  - i) Age
  - ii) Disability
  - iii) Gender reassignment
  - iv) Marriage and civil partnership
  - v) Pregnancy and maternity
  - vi) Race (including colour, nationality and ethnic or national origins)
  - vii) Religion or belief
  - viii) Sex (gender)
  - ix) Sexual orientation.
- c) The Act also sets out six types of unlawful discrimination:
  - i) **Direct discrimination** – where someone is treated less favourably than another person because of a protected characteristic.
  - ii) **Associative discrimination** – this is direct discrimination against someone because they are associated with another person who possesses a protected characteristic.
  - iii) **Discrimination by perception** – this is direct discrimination against someone because others think that they possess a protected characteristic. They do not necessarily have to possess the characteristic, just be perceived to.
  - iv) **Indirect discrimination** – this can occur when you have a rule or policy that applies to everyone but disadvantages a person with a protected characteristic.
  - v) **Harassment** – this is behaviour that is deemed offensive by the recipient. Employees can now complain of the behaviour they find offensive even if it is not directed at them.
  - vi) **Victimisation** – this occurs when someone is treated badly because they have made or supported a complaint or grievance under this legislation.

### 4. Scope

- a) This policy applies to every member of our workforce. Our workforce comprises trustees, employees, interns, trainees, volunteers and contractors/consultants.
- b) Delivery partners, suppliers and other third parties with whom we work must also demonstrate their commitment to equality, diversity and inclusion.

- c) We have a range of other policies and procedures that support our equality, diversity and inclusion practices: Anti- Bullying and Harassment Policy; Complaints Procedure; Data Protection Policy; Employee Code of Conduct; Flexible Working Policy and Procedure; Trustees' Governance Manual; Grievance and Disciplinary Procedures; Health and Safety Policy; HR Management Policy; Reasonable Adjustments Procedure; Recruitment and Selection Policy and Procedure; Safeguarding Policy; Volunteers Policy and Procedure.

## 5. Aims

- a) To demonstrate leadership and commitment in promoting equality, diversity and inclusion and in challenging inequality, prejudice, intolerance and discrimination.
- b) To promote positive and open-minded behaviours among our workforce and service users.
- c) To promote an inclusive organisational culture which is intolerant of discrimination, stereotyping, bullying, harassment and victimisation.
- d) To ensure our governance, operational and service delivery structures, projects and processes show due regard for equality, diversity and inclusion.
- e) To consider the impact of our decisions on under-represented and socially excluded groups.
- f) To ensure people feel included and supported, innovation and creativity are enabled, organisational performance is high and service user experience and organisational reputation are excellent.
- g) To develop good equality, diversity and inclusion practices and procedures over and above those required by law and to work with others to share best practice.
- h) To show due regard for other people who experience inequality and social exclusion including, for example, care leavers, ex-offenders, recovered addicts, refugees and asylum seekers, carers and people who are socio-economically excluded.
- i) To ensure that our workforce and service users are treated as people – not categories defined by diversity characteristics.

## 6. Responsibilities

- a) Ultimate responsibility for approving and ensuring awareness of and compliance with this policy rests with our Council of Management:
  - i) **Setting context-specific and realistic plans and targets**
    - The Council of Management sets a clear organisational approach to equality, diversity and inclusion in line with the charity's aims, strategy, culture and values. This is supported by appropriate plans, policies, milestones, targets and timelines.
    - The Council of Management uses the findings from its assessments to make context-specific and regularly reviewed plans and targets for:
      - equality, diversity and inclusion training for board members
      - inclusive boardroom culture, practices and behaviours
      - board evaluation or training to address any power imbalances between trustees
      - removing, reducing and preventing obstacles to people being trustees
      - attracting a diverse group of candidates for new trustee roles and providing an inclusive induction for new trustees
      - recruiting a diverse board that addresses imbalances and any gaps that have been found
      - promoting inclusive behaviours and cultures to the wider organisation.



- d) Service Managers are responsible for:
  - i) Developing their teams so that they understand the context of and the specific issues influencing equality, diversity and inclusion.
  - ii) Ensuring their services comply with this policy and strategy; address equality, diversity and inclusion objectives for which they will be held accountable; and implement the monitoring and evaluation procedures agreed corporately for their services.
- e) Members of our workforce are individually and collectively responsible for:
  - i) Being aware of and paying due regard to the provisions of this policy.
  - ii) Ensuring compliance with this policy on a day-to-day basis when undertaking their jobs or representing the organisation.
  - iii) Valuing and respecting each other's and service users' contributions.
  - iv) Creating discrimination-free and harassment-free working and service delivery environments.
- f) Acts of discrimination, bullying or harassment by our workforce are not tolerated and will be taken very seriously and result in disciplinary action. Failure to comply with this policy will be treated in a similar fashion.
- g) Acts of discrimination, bullying or harassment by those acting on behalf of, or contracted by us will lead to appropriate action including termination of supplier/service contracts and or partnership agreements where appropriate.

## 7. Objectives

Our equality, diversity and inclusion objectives are to:

### a) Governance

- i) Ensure equality, diversity and inclusion informs and influences our business strategies.
- ii) Ensure equality, diversity and inclusion is addressed within business plans and central to organisational performance assessment.
- iii) Promote inclusive behaviours by leaders, managers and individuals.
- iv) Ensure we know the diversity of our community and understand its needs.
- v) Ensure we make it clear that breaches of equality law and this policy will be treated as disciplinary matters or breaches of contract.
- vi) Achieve appropriate externally accredited standards and quality marks for our equality, diversity and inclusion practices and processes.

### b) Management

- i) Ensure the methods, policies and processes supporting recruitment, selection and progression are effective in recruiting and retaining a diverse workforce.
- ii) Ensure the process and delivery of reasonable adjustments is effective.
- iii) Promote an organisational culture that challenges the factors that limit workforce opportunity and progression.
- iv) Promote social mobility within our workforce and provide career support for people from under-represented and socially excluded groups.
- v) Tackle discrimination, bullying and harassment promptly.
- vi) Tackle unconscious prejudice, stereotyping and or bias in peoples' decision-making and/or behaviour.
- vii) Work in partnership with public, private, voluntary and community organisations to achieve our aims, reduce equality gaps and promote social inclusion.
- viii) Ensure each service delivery team has equality, diversity and inclusion business objectives, for which it is accountable through performance management.

**c) Services**

- i) Increase access to our services by under-represented and socially excluded groups.
- ii) Deliver accessible, person-centred and inclusive services that:
  - Value diversity
  - Respond appropriately to peoples' differences
  - Challenge the factors that limit service users' opportunities
  - Empower and build service users' resilience
- iii) Ensure our service users:
  - Are treated with and treat each other and our workforce with dignity and respect
  - See themselves reflected throughout our workforce
  - Are actively engaged in decision making processes to improve the services we provide
  - Include a diverse range of people who feel excluded from mainstream services and/or are socially excluded from society
- iv) Increase service users' declaration/self- disclosure rates of equality and diversity data.
- v) Act promptly if we receive complaints of discriminatory practice or behaviour.

**d) Workforce**

- i) Ensure our workforce:
  - Includes a diverse range of talent and is representative of our service users, local community and wider society.
  - Is culturally competent and can understand, communicate with and effectively interact with people across society.
  - Is treated with and treats others with dignity and respect.
  - Values uniqueness so that people can be themselves at work.
  - Is accountable for providing services which are accessible and demonstrate good equality, diversity and inclusive practice.
- ii) Increase workforce declaration/self-disclosure rates of equality, diversity and inclusion data.

**e) Procurement**

- i) Ensure that the purchase of goods, services and facilities is undertaken in line with our equality and diversity commitments.
- ii) Use suppliers who share our values on equality of opportunity and diversity.
- iii) Establish procedures to ensure that businesses from diverse communities have an equal opportunity to compete for contracts to supply goods and services.

**8. Trans Inclusion**

In this policy the term 'trans' is used to refer to:

- People who do not identify with a permanent binary gender identity, including those who identify in other ways, such as genderqueer, gender variant, non-binary or agender. These terminologies are evolving and highly personal and this list is not exhaustive.
- People who are taking or have taken steps to change the gender identity. This includes people covered by the Equality Act definition: "A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex."

- Gendered Intelligence provide a [Glossary](#) that focusses specifically on a short list of terms that describe key ideas relevant to trans people's lives. These are terms that enable us to think and talk meaningfully about wider trans inclusion and to establish positive, inclusive policy and practice. It is not an exhaustive list of all terms relating to trans people, and the descriptions should not be regarded as fixed definitions used or agreed by everyone. However, they have been carefully considered and written to underpin a consistent, practical understanding of the basics in a workplace setting.

**a) Our commitments**

Cambridge House seeks to provide a supportive environment for trans staff and to create a culture and environment where trans staff are able to thrive and are well supported during any process of transition.

We commit to:

- Being inclusive to all gender expressions and identities above and beyond what is required by legislation and we acknowledge that language can evolve quickly.
- Ensuring no trans person suffers discriminatory treatment at work.
- Creating a safe and inclusive workplace for trans employees and service users.
- Speaking out when we witness or hear transphobia.
- Challenging decisions that exclude trans people, including ways of thinking that perpetuate a rigid gender binary.
- Learning how best we can support our trans colleagues at all times.
- Educating ourselves and those around us.

**b) Legislation**

The Equality Act 2010 has strengthened and streamlined previous equalities legislation. Gender reassignment is one of the nine protected characteristics within the Act.

The definition of gender reassignment within the Act gives protection from discrimination to a person who has proposed, started or completed a process to change their sex. The Act also protects:

- trans people who are not under medical supervision;
- people who experience discrimination because they are perceived to be trans people; and
- people from discrimination by association because of gender reassignment.

The Human Rights Act 1998 provides protection to trans people, principally under the right to a private life.

**c) Trans respect**

Asking trans people questions about their experiences can be a great way to learn more about what it means to be trans. Some trans people are open to answering just about anything, while others may not want to share intimate details about their lives, especially outside of personal conversations with close friends.

Here is a [LINK](#) to a guide that is intended to help you decide whether or not a particular question is appropriate to ask a trans person in your life. It also has answers to specific questions you may have, along with thoughts on why trans people may be uncomfortable if you ask them those questions directly.



The following informal guidelines on how to treat people who are transitioning may be helpful for a trans person's colleagues.

- Use the name and pronoun that the person asks you to. If you are not sure what the right pronoun is, then simply ask. If you make a mistake with pronouns, correct yourself and move on. Do not make a big deal out of it.
- Respect people's privacy. Do not ask what their 'real' or 'birth' name is. Trans people may be sensitive about revealing information about their past, especially if they think it might affect how they are perceived in the present.
- Similarly, respect their privacy. Do not tell others about a person's trans status. If documents have to be kept that have the person's old name and gender on them, keep them confidential.
- Respect people's boundaries. If you feel it is appropriate to ask a personal question, first ask if it is ok to do so. Personal questions include anything to do with one's sex life, anatomy and relationship status – past, present or future.
- Listen to the person, and ask them how they want to be regarded and referred to.

#### **d) Support**

- An employee going through the process of gender reassignment can seek support from their manager, Head of Service or a member of the Leadership Team.
- It is a matter of choice who should be contacted but it is recommended that the contact person works with the employee to agree an action plan to cover the period of their transition. It is imperative that confidentiality is maintained at all times, for staff who may be going under transition or have in the past undergone gender reassignment.
- Gendered Intelligence have a Trans Inclusion support list at this [LINK](#)

#### **e) Identification**

A trans person can ask us to change their full name, appropriate pronouns and gender on their personnel/organisational records simply by notifying the Chief Executive or the Leadership Executive (both of whom have HR oversight) of:

- their intention to transition, and
- their name change (this is usually done by providing a [Gender Recognition Certificate](#) and/or a [Statutory Declaration of Change of Name](#) or a [Deed Poll](#) document, but this is not a requirement).

#### **f) Using gender pronouns in email signatures**

- Pronouns in email signatures show how the email senders identify themselves and how they would like to be referred to in the third person. Using them in email signatures can help to demonstrate that we are inclusive of everyone and acknowledge gender diversity.
- Our employees can choose whether or not they want to include personal gender pronouns in their email signatures.
- Common options include adding one of the following after your name:
  - (he/him/his)
  - (she/her/hers)
  - (they/them/their)

**g) Protection against harassment and bullying**

We recognise that it is the right of every individual to choose whether to be open about their gender identity and history. To 'out' someone, whether staff or student, without their permission may amount to a form of harassment and possibly a criminal offence.

Transphobic bullying and harassment can be regarded as grounds for disciplinary action, which may include dismissal. Such behaviour will be dealt with under the Cambridge House's **Disciplinary Policy** with reference to the organisation's **Anti-Bullying, Anti-Harassment and Dignity at Work Policy**.

**10. Complaints of discrimination**

- a) We treat seriously, and investigate all complaints of bullying, harassment, victimisation and discrimination in respect of any of the prohibited characteristics by members of our workforce, service users, suppliers, visitors, the public and any others involved in our work and activities.
  - i) This includes behaviour that makes someone feel intimidated or offended.
  - ii) The effect on the individual is more important than the intention of the perpetrator.
  - iii) Unacceptable behaviour could include:
    - Spreading malicious rumours
    - Unfair treatment
    - Picking on someone
    - Regularly undermining a competent worker
    - Denying someone training or promotion opportunities
    - Persistent rudeness
    - Isolating, ignoring or refusing to work with certain people
    - Telling offensive jokes or name calling
    - Displaying offensive material such as pornography or sexist / racist cartoons, or the distribution of such material via email / text message or any other format.
- b) All complaints are investigated in accordance with our Disciplinary, Grievance or Complaints Procedures as appropriate.

**11. Employment**

- a) We will treat our workforce equally and create a working environment which promotes inclusion, respects diverse backgrounds and beliefs, and is safe and free from discrimination, stereotyping, bullying and harassment. This includes provision of accessible workspaces and communication processes; arrangements for recruitment and selection, terms and conditions of employment; access to training opportunities; access to promotion and transfers; grievance and disciplinary processes; selection for redundancies; work allocation and any other employment-related activities.
- b) The provision of benefits such as working hours, maternity, paternity and other leave arrangements, performance appraisal systems, and any other conditions of employment will not discriminate against any employee on the grounds of any of the protected characteristics.

## **12. Promotion and career development**

- a) Promotion within Cambridge House will be based solely on merit and made in accordance with the principles of equality and diversity.
- b) The selection criteria and processes for recruitment and promotion will be kept under review to ensure that there is no discriminatory impact on any group.
- c) Whilst positive action measures may be taken in accordance with the relevant equality and diversity legislation to encourage under-represented groups to apply for promotion opportunities; recruitment or promotion to all jobs will be based solely on merit.
- d) All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities. However, we will take positive action measures where appropriate (as permitted by the equality and diversity legislation) to provide special training and support for groups which are under-represented in the workforce and encourage them to take up training and career development opportunities.
- e) We encourage a life-work balance amongst our workforce and offer the provision of flexible working options as set out in the Flexible Working Policy.

## **13. Recruitment and selection**

- a) We take steps to ensure that:
  - i) We recruit from the widest pool of qualified candidates.
  - ii) Employment opportunities are open and accessible to all based on their individual qualities and personal merit.
  - iii) Positive action measures are taken to attract applications from all sections of society and especially from those groups which are under-represented in our workforce.
  - iv) Selection criteria and processes do not discriminate unjustifiably on the grounds of the protected characteristics.
  - v) When appropriate and necessary, lawful exemptions (genuine occupational requirements) will be used to recruit suitable staff to meet the special needs of under-represented and or socially excluded groups.
  - vi) Recruitment agencies acting for Cambridge House are aware of our aim to promote diversity and inclusion and act accordingly.
- b) We regularly review our recruitment procedures to ensure we attract and retain individuals from diverse backgrounds.
- c) Our recruitment processes invite candidates to complete voluntary equality and diversity monitoring forms that are retained for monitoring and central analysis only.

## **14. Reasonable adjustments**

- a) We take steps to address the needs of individuals in our workforce who are disabled, have special educational needs, long-term physical or mental health conditions, or temporary illnesses/injuries so that they can reach their full potential at work.
- b) We encourage our workforce to tell us their needs so that we can support them as appropriate and make reasonable adjustments as required, for example, by providing an adequate chair or changing hours to ease travel to and from work.
- c) Time off to observe religious festivals to accommodate religious or other beliefs will be accommodated where reasonable.
- d) Flexible forms of working such as job sharing, part time working, flexible hours and home working will be considered where reasonable based on equality of opportunity and respect for diversity and in accordance with the procedures set out in our Flexible Working Policy.

## **15. Monitoring of equality and diversity data**

- a) Equality and diversity information is analysed and monitored to help us devise positive action plans to address under-representation in our workforce and service users.
- b) Our workforce, service users and applicants for trusteeships, jobs, internships and volunteer roles are encouraged to voluntarily disclose equality and diversity information.
- c) Equality and diversity information is confidentially recorded and anonymised when centrally analysed for monitoring purposes.
- d) We maintain records of the details, number and outcome of complaints of discrimination made by workforce, service users and other third parties.
- e) We maintain records of any disciplinary action (if any) taken against members of our workforce because of failure to comply with this policy.

## **16. Monitoring and review of this policy**

- a) Feedback forms from service users are analysed to monitor and evaluate the success of this policy in respect of our services.
- b) Feedback provided through staff appraisals and staff and trustee surveys is analysed to evaluate the success of the policy in respect of our workforce.
- c) The Council of Management will review:
  - i) This policy every three years to ensure it reflects best practice.
  - ii) The effectiveness of this policy by considering annual reports on workforce and service user diversity; discrimination complaints and grievances; and workforce and service user feedback.

## 17. Strategy

**We will create an environment where people are respected and safe from prejudice, stereotyping, bullying, harassment, and discrimination by:**

- a) Setting clear standards of behaviour.
- b) Raising awareness of discrimination, bullying and harassment and its impacts.
- c) Enhancing management confidence and capability in dealing with discrimination, bullying and harassment.
- d) Promoting inclusive behaviour by leaders, managers and individuals.
- e) Celebrating diversity by supporting and empowering our workforce and service users.
- f) Creating opportunities for people to share experience.



We will have achieved this when:

- a) All members of our workforce treat each other and services users with dignity and respect.
- b) None of our workforce or services users experience discrimination, bullying, victimisation or harassment because of their individual differences.
- c) We recognise and value everyone's individual contribution.
- d) Our workforce feels confident challenging disrespectful and non-inclusive behaviours.



We will monitor our performance by:

- a) Regular review and analysis of:
  - i) Quantitative and qualitative information from workforce and service user surveys.
  - ii) Workforce and service user equality and diversity information.
- b) Evaluation of HR policies and their impact on under-represented groups.

**We will promote inclusive behaviours and use our data to drive workplace improvements by:**

- a) Raising awareness of inclusive behaviours and best practice.
- b) Promoting inclusive leadership.
- c) Identifying and removing barriers to creating an inclusive workplace.
- d) Enabling our workforce to share their diversity information confidently and securely.
- e) Using our diversity information to inform organisational and workforce plans.
- f) Regularly monitoring our diversity information and using this to inform HR policies.
- g) Creating a fully accessible workplace by ensuring workplace adjustments are in place quickly and effectively.



**We will have achieved this when:**

- a) Everyone in our workforce demonstrates inclusive behaviours.
- b) Everyone in our workforce feels included and able to be themselves at work.
- c) Cambridge House is recognised internally and externally as a great place to work.
- d) Our workforce is representative of the local population, i.e., 50% Female; 6% LGBT; 14% Disabled and 43% Black, Asian and Minority Ethnic.



**We will monitor our performance by:**

- a) Regular review and analysis of:
  - i) Quantitative and qualitative information from workforce surveys.
  - ii) Workforce equality and diversity information.
- b) Assessing our efficiency in implementing workplace adjustments.

**We will ensure everyone is supported in the workplace to achieve their full potential by:**

- a) Adopting a fair, transparent selection process that brings out the best in people and attracts new talent.
- b) Providing opportunities for our workforce to develop.
- c) Recognising and developing the potential of all and providing career support for under-represented groups.
- d) Supporting collegiate decision-making processes to provide opportunities for leaders and managers to learn from and develop their teams.



**We will have achieved this when:**

- a) Our workforce is diverse and representative of the communities we serve.
- b) Our employment and HR development opportunities are accessible to everyone.
- c) Everyone in our workforce feels supported in their career development.
- d) All HR practices show due regard for equality, diversity and inclusion and risks of stereotyping, unconscious bias or barriers are mitigated.



**We will monitor our performance by:**

- a) Regular review of quantitative information from workforce surveys, recruitment data, and uptake of personal development opportunities.
- b) Analysis of qualitative indicators such as feedback from our workforce.
- c) Evaluation of HR policies and analysis of any impact on under-represented groups.

**We will engage with under-represented and excluded groups by:**

- a) Using all available forms of media, including social media (e.g. Twitter, Linked In) to communicate to as wide an audience possible.
- b) Building relationships with and working within under-represented communities.
- c) Connecting with and or collaborating with other organisations such as special interest civil society organisations to attract high potential people from different backgrounds.
- d) Consulting with our service users.
- e) Recruiting volunteers and work experience placements from under-represented groups.



**We will have achieved this when:**

- a) Our workforce understands, embraces and consistently applies this equality, diversity policy and strategy.
- b) Our workforce sees our trustees and managers actively championing and demonstrating key equality, diversity and inclusion messages.
- c) Our service users feel that their individual needs are valued.
- d) Our organisational brand is positively recognised by under-represented and socially excluded groups.
- e) We attract and retain people from the widest range of under-represented and socially excluded groups.



**We will monitor our performance by:**

- a) Regular review of quantitative information from workforce surveys and communications data (e.g. online activity).
- b) Regular review of quantitative information from service user records.
- c) Qualitative indicators such as feedback from our workforce and service users.
- d) Evaluation of HR policies and analysis of any impact on under-represented groups.