

**Turtle Dove Cambridge Community Interest Company**

**Equality & Diversity Policy**

**Reviewed: May 2025**

**Review due: May 2026**

### **Purpose**

Turtle Dove Cambridge (TDC) is committed to promoting equality and diversity in all aspects of its operations. We believe that embracing diversity and treating everyone fairly, with dignity and respect, creates a positive and inclusive work environment. TDC recognises that discrimination and victimisation is unacceptable and adopts a non-judgemental, respectful, unbiased and anti-discriminatory approach in its service delivery and working practices.

TDC recognises that it is in the interests of the company and its employees, volunteers and participants to include the total community in its work. It is the aim of TDC to ensure that no employee, job applicant, volunteer or service user receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on the grounds of age, race, sex, sexual orientation, disability, religion or belief, marital status, maternity and pregnancy, or gender reassignment. These are the protected characteristics as defined in the Equalities Act 2010.

### **Aim**

Our aim is that our workforce and participants will be truly representative of all sections of society and each employee, volunteer and service user feels respected and able to give their best.

We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the aim of this policy is to provide equality and fairness for all in our employment and participating in our activities and projects.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect, in an environment free of harassment and bullying. This is an important aspect of ensuring equal opportunities in employment. 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 organisation.

Our staff will not discriminate directly or indirectly, or harass participants because of a 'protected characteristic', as defined above.

This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies.

As part of our commitment to equal opportunities we work with those who experience discrimination supporting them to overcome discrimination and disadvantage/barriers within society. We provide opportunities for and encourage intergenerational work helping to combat discrimination and break down barriers within communities.

We recognise the value and role of those who experience discrimination in supporting us in developing our equal opportunities procedures.

### **Our Commitment**

We are committed to:

- providing equal opportunities in employment and to avoiding unlawful discrimination. This policy is intended to assist putting this commitment into practice;
- creating an environment in which individual differences and the contributions of all our staff, volunteers, service users and clients are recognised and valued;
- creating an environment which actively supports our service users in overcoming discriminations and disadvantage;
- every employee, volunteer and service user on ensuring a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated;
- provide services users with the opportunity to take part in the activities and projects in an environment free of prejudice. It is the responsibility of all staff to educate against any form of prejudice or negative stereotyping and to ensure that their conduct with young people and colleagues reflects this responsibility at all times;
- ensuring that all publicity materials consider race, culture, language, gender, sexuality, disability and religion;
- promoting equality in the workplace which we believe is good management practice and makes sound business sense’
- reviewing all our employment practices and procedures to ensure fairness;
- drafting job descriptions that avoid any unnecessary requirements (those unrelated to effective performance) that may otherwise have deterred applicants. We will base decisions on objective criteria;
- ensuring that breaches of our equality policy are regarded as misconduct and could lead to disciplinary proceedings;
- senior management and the board of directors fully supporting and upholding the principles of this policy and;
- monitoring and reviewing this policy annually.

### **Responsibilities of Management**

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the board of Directors and Members. Employees will ensure that they operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination.

Each Employee, volunteer and service user will ensure that:

- they are aware of the policy and the arrangements, and the reasons for the policy;
- an appropriate grievance procedure is in place and employees, volunteers, clients and service users are informed of its existence;
- grievances concerning discrimination are dealt with properly, fairly and as quickly as possible and;

- proper records are maintained

The Directors will be responsible for monitoring the operation of the policy in respect of employees, job applicant's volunteers and participants, including periodic audits.

### **Responsibilities of Employees**

Responsibility for ensuring that there is no unlawful discrimination rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices.

In particular, all members of staff should:

- comply with the policy and arrangements;
- not discriminate in their day to day activities or induce others to do so;
- not victimise, harass or intimidate others who have, or are perceived to have one of the protected characteristics;
- ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic;
- inform the TDC team leaders if they become aware of any discriminatory practice;
- ensure that styles, methods, language, questioning and centre management includes and engages all service users;
- suitable activities and projects are chosen which motivate and are sensitive to different groups, cultures and backgrounds;
- be aware of possible cultural assumptions and bias within their own attitudes and;
- support and encourage volunteers and service users in the inclusion within decision making of the work.

### **Equality**

Employees will undertake regular briefing on this policy and equality issues. These will be repeated as necessary. Equality information is also included in induction programmes.

We will provide information and guidance to those involved in recruitment or other decision making where equal opportunities issues are likely to arise to help them understand their responsibilities and to avoid the risk of discrimination.

### **Grievances/Discipline**

If you believe that you have been discriminated against you should report this to your line manager or the TD Executive Director under the grievance procedure. We take any complaint seriously and you will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Employees can be held personally liable as well as, or instead of, the organisation for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence. Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under our disciplinary

procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

### **Planning of Services**

New projects or changes to existing sessions and projects are developed to take account of equality and diversity. We consult with a wide range of service users, clients and potential users and clients at all stages. TDC will be accessible, friendly and safe for all current and potential employees, volunteers, users and clients. Service users will access the services through our partner agencies informing them of and referring them to our services. These referrals will be made on the grounds that service users will benefit from our support and are NEET or at risk of becoming NEET.

Our services will be accessible to clients through private booking in which a written agreement is made stating the services that will provide and the terms and conditions. Events and projects are designed in a sensitive and appropriate manner to meet the diverse needs of potential and current service users.

Services will be publicised through its website, flyers, and links with referring agencies and partner agencies. All information will be engaging clearly presented, and easy to read with images to aid understanding to cater for all learning styles and abilities.

Service users are included within the decision making of what events and projects they wish to be involved with. We will regularly seek their feedback to support us in maintaining and improving our support/services.

A kit list is given to all employees, volunteers and service users informing them of TDC expectations of them and the code of practice. The Kit list is clearly written and easy to read. For those whom have literacy difficulties or a language barrier the list can be read out during the induction.

### **Delivery of Services**

We will not discriminate unlawfully against service users using or seeking to use the services we provide.

During the planning and delivery of events and projects the following factors are acknowledged; the requirements of the service users alongside TDC aims and objectives and; whether they are accessible for the service users, i.e. is the venue suitable and easy to get to and are the timings suitable.

Where required transport support is offered to service users and volunteers through the organisation of Taxis, and bus fares paid for or re-reimbursed. TDC services are accessible, easy to contact and approach through publicity and TDC Workers. Service users, volunteers and clients can contact TDC workers via email, phone and speaking with them in person, and through arranging meetings.

Current and potential service users, partner agencies and clients will be consulted during the preparation of publicity materials. The materials will be widely available and targeted appropriately where necessary.

### **Third Parties**

Third-party harassment occurs where a TDC employee or volunteer is harassed, and the harassment is related to a protected characteristic, by third parties such as service users' suppliers, contractor, visitor or others. TDC will not tolerate such actions against its staff, and the employee concerned should inform the Director at once that this has occurred. If you witness someone else being bullied or harassed, you are asked to report this to your manager who will take appropriate action. TDC will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

### **Related Policies and Arrangements**

All employment policies and arrangements have a bearing on equality of opportunity. The TDC policies will be reviewed regularly and any discriminatory elements removed.

### **Rights of People with disabilities**

The TDC attaches particular importance to the needs of people with disabilities.

Under the terms of this policy, employees are required to:

- make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours. (NB: managers are expected to seek advice on the availability of advice and guidance from external agencies to maintain people with disabilities in employment);
- give full and proper consideration to people with disabilities who apply for jobs, volunteer positions and wish to participate in activities having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be included

### **Monitoring**

The TDC deems it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the organisation as a whole. Accordingly, a monitoring system will be introduced to measure the effectiveness of the policy and arrangements.

The system will involve the routine collection and analysis of information on employees, volunteers and service users by gender, marital status, ethnic origin, sexual orientation, and religion/beliefs. Information regarding the number of employees who declare themselves as disabled will also be maintained.

Employees, volunteers and service users will complete feedback forms based on our equal opportunities' procedures. This information will be used to support us in updating our policies and procedures and effectively implementing these.

The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.

If monitoring shows that the TDC, or areas within it, are not representative, or that sections of our workforce are not progressing properly within the TDC, then an action plan will be developed to address these issues. This will include a review of recruitment and selection procedures, TDC policies and practices as well as consideration of taking legal action.

### **Policy Review**

This policy will be monitored periodically to judge its effectiveness and will be updated in accordance with changes in the law, under the direct supervision of the TDC Executive Director. We will report to the Board of Directors on any actions or activities undertaken to improve equality of opportunity. Any information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection legislation.

## Appendix

### **The Law**

- It is unlawful to discriminate directly or indirectly in recruitment or employment because of a 'protected characteristic'. The Equality Act defines the protected characteristics as being age, race, sex, sexual orientation, disability, religion or belief, marital status, maternity and pregnancy, and gender reassignment.
- Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.
- It is also unlawful to discriminate against or harass a member of the public or service user in the provision of services or goods or to fail to make reasonable adjustments to overcome barriers to using services caused by disability.
- The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

### **Types of Unlawful Discrimination**

- **Direct discrimination** is where a person is treated less favourably than another because of a protected characteristic. However, discrimination may be lawful if there is an occupational requirement that is core to a job role and a proportionate means of achieving a legitimate aim.
- **Indirect discrimination** means putting in place, a rule or policy or way of doing things that has a worse impact on someone with a protected characteristic than someone without one, when this cannot be objectively justified.
- **Harassment** is where there is unwanted behaviour related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity) which has the purpose or effect of violating someone's dignity or which creates a hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.
- **Associative discrimination** is where the individual treated less favourably does not have a protected characteristic but is discriminated against because of their association with someone who does e.g. the parent of a disabled child.
- **Perceptive discrimination** is where the individual discriminated against or harassed does not have a protected characteristic but they are perceived to have a protected characteristic.
- **Third-party harassment** occurs where an employee is harassed by third parties such as service users, due to a protected characteristic.

- **Victimisation** is treating someone unfavourably because they have taken some form of action relating to the Equality Act i.e. because they have supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint.
- **Failure to make reasonable adjustments** is where a rule or policy or way of doing things has a worse impact on someone with a protected characteristic compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

### **Terminologies and descriptors**

Disability under the Equality act 2010 is defined as ‘a physical or mental impairment that has a substantial and long-term adverse effect on the ability to carry out normal day-to-day activities. ‘Substantial’ means more than minor or trivial. ‘Impairment’ covers, for example, long-term medical conditions such as asthma and diabetes, and fluctuating or progressive conditions such as rheumatoid arthritis or motor neurone disease. A mental impairment includes mental health conditions (such as bipolar disorder or depression), learning difficulties (such as dyslexia) and learning disabilities (such as autism and Down’s syndrome). Some people, including those with cancer, multiple sclerosis and HIV/AIDS, are automatically protected as people with disabilities by the Act. People with severe disfigurement will be protected as disabled without needing to show that it has a substantial adverse effect on day-to-day activities.

**Discrimination arising from disability** occurs when a person with disabilities is treated unfavourably because of something connected with their disability and this unfavourable treatment cannot be justified. Treatment can be justified if it can be shown that it is intended to meet a legitimate objective in a fair, balanced and reasonable way. If this can be shown then the treatment will be lawful. This form of discrimination can occur only if the service provider knows or can reasonably be expected to know that the person with disabilities is disabled. Positive discrimination is illegal under UK anti-discrimination law and shouldn’t be confused with Positive Action.

**Positive discrimination** generally means being favourable towards an individual or group for whatever reason outlined.

**Positive action** is legal and describes measure targeted at a particular group that are under-represented in a particular programme or aspect of a sport. These measures are intended to redress past discrimination or to offset the disadvantages arising from existing attitudes, behaviours and structures. Lawful positive action measures can include: - Targeting job training at people of particular racial groups, or either gender, which have been underrepresented in certain occupations or grades during the previous 12 months, or encouraging them to apply for such work. - Providing facilities to meet any specific educational, training or welfare needs identified for a specific racial group. - Special action

being taken is the employment of a female coach to lead a session aimed at women, to specifically encourage uptake and participation by female players.

**Prejudice** is literally pre-judging someone. It is usually led by negative, irrational feelings, resulting from preconceived attitudes and opinions.

**Stereotyping** is grouping or labelling people because they are members of a particular 'visible' group, and assuming that they have particular traits that are considered to be characteristics of that group.

**Dignity** is about respectful, responsible, fair and humane behaviour, something that is reflected in the constitution.

**Disadvantage** is where, as a result of discrimination, an individual or group is deprived of some or all resources and opportunities. This may affect people directly or indirectly.

**Social exclusion** is when people or areas suffer from one or a combination of linked problems such as unemployment, poor skills, low income, high crime environments or lack of facilities.