



Equality, Diversity & Inclusion Policy 2024

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CONTENTS

1. Introduction.....	1
2. Status of this policy.....	1
3. Scope.....	1
4. Roles and responsibilities.....	1
5. Aims of this policy.....	2
6. Discrimination.....	3
7. Our responsibilities and approach.....	4
7.1. Recruitment and selection.....	5
7.2. Promotion, training and appraisals.....	5
7.3. Working conditions and terms of employment.....	6
7.4. Termination of employment.....	6
7.5. Disabilities.....	6
7.6. Training on equalities.....	6
7.7. Monitoring.....	6
7.8. Your rights and responsibilities.....	7
7.9. Fostering good relations.....	7
7.10. What to do if you have been discriminated against.....	8
7.11. What will happen if you act in a discriminatory way?.....	8
8. Data protection.....	8
9. Policy review and promotion.....	8
10. Related legislation and guidance	8
11. Links to other relevant policies.....	9

1. Introduction

The KORU Project CIC is committed to eliminating discrimination, promoting equal opportunities and encouraging diversity amongst our workforce and job applicants. Our objective is to create a working environment that is fair, equitable and inclusive and in which each KORU representative is respected and able to flourish.

Equally, as a provider of therapeutic services we are committed to uphold the human rights of all and prevent any unlawful discrimination of the individuals and families we support.

This policy has been agreed with senior management and has the full support of our board of directors.

2. Status of this policy

This policy is non-contractual. The KORU Project CIC reserves the right to alter any of its terms, at any time, following consultation with our relevant KORU representatives. We will notify in writing as required all KORU representatives and external agencies of changes made.

3. Scope

This policy applies to all representatives of The KORU Project CIC (referred to in this policy as KORU representatives). This includes freelance therapists, mentors, employees, volunteers, trainees, and students.

4. Roles and responsibilities

The board of directors has overall responsibility for this policy but has delegated responsibility for managing its implementation to the KORU Project CIC Designated Safeguarding Lead (DSL).

Day-to-day responsibility for the operation of the policy sits with the HR manager and management team. If you have any questions about this policy, you should direct them to the KORU DSL in the first instance.

All managers are expected to lead by example, conducting themselves in accordance with this policy and ensuring that those they manage do the same.

The designated member of staff for equality will:

- Promote knowledge and understanding of the equality objectives among KORU representatives, professionals, and clients.
- Identify any staff training needs and deliver training as necessary.
- Ensure that the equality information and objectives as set out in this statement are published and communicated throughout the KORU Project CIC, including to staff, clients, families, and professionals.
- Become familiar with all relevant legislation and the contents of this document.
- Attend appropriate equality and diversity training.

- Report back to the full governing board regarding any issues
- Monitor success in achieving the objectives and report back to governors.
- Ensure that the published equality information is updated at least every year, and that the objectives are reviewed and updated at least every 4 years.

All KORU representatives are expected to act in accordance with this document.

5. Aims of this policy

The KORU Project CIC aims to meet its obligations under the Public Sector Equality Duty (PSED) by having due regard to the need to:

- Eliminate discrimination and other conduct that is prohibited by the Equality Act 2010
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all characteristics – between people who share a protected characteristic and people who do not share it.
- Provide equality, fairness, and respect for all KORU Representatives and service users.

The KORU Project CIC commits to:

- Encourage equality and diversity in the workplace as this is good practice and makes business sense.
- Create a working environment free of bullying, harassment, victimisation, and unlawful discrimination; promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
- Informing all KORU representatives of their responsibilities so they understand they can be held liable for acts of bullying, harassment, victimisation, and unlawful discrimination, in the course of their employment, against fellow KORU Representatives.
- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by KORU Representatives or clients and any others during the KORU Project's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

- Make opportunities for training, development, and progress available to all KORU Representatives, who will be helped and encouraged to develop their full potential,

so their talents and resources can be fully utilised to maximise the efficiency of the KORU Project CIC.

- Decisions concerning KORU representatives being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- Monitor the make-up of the workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity, and in meeting the aims and commitments set out in the equality policy. Monitoring will also include assessing how the equality policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

6. Discrimination

Discrimination is unlawful when it takes place on one of the following grounds (ie. 'protected characteristics'):

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (which includes colour, nationality and ethnic or national origin)
- religion or belief
- sex
- sexual orientation

Discrimination can take a number of forms:

- Direct discrimination is when someone is treated less fairly than someone else (or less fairly than someone else would be treated) because of a protected characteristic. For example, it would be direct discrimination if a manager excluded a KORU representative from a training course because they are gay.
- It is also direct discrimination when someone is treated less fairly than someone else (or less fairly than someone else would be treated) because they associate with someone with a protected characteristic or because they are perceived to have a protected characteristic. For example, it would be direct discrimination if an employee ostracised a colleague because the colleague has a gay flatmate or because they think the colleague is gay.
- Indirect discrimination is when an apparently neutral practice or requirement disproportionately disadvantages people with a particular protected characteristic and cannot be justified by the needs of the organisation (as a proportionate means of achieving a legitimate aim). For example, imposing a requirement that job applicants

must speak fluent English disproportionately disadvantages groups who are not native English speakers and would be unlawful unless it could be justified on genuine business grounds.

- It is also discrimination when a disabled person is treated unfavourably because of something connected to their disability and this cannot be justified by the needs of the business (as a proportionate means of achieving a legitimate aim), or when the organisation fails to make reasonable adjustments for a disabled person to alleviate the disadvantage(s) caused by the disability.
- Harassment is another form of discrimination. This includes sexual harassment and other unwanted conduct related to a protected characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. For further details, see our Anti-Bullying Policy.
- Victimisation, i.e. retaliating against someone who has complained about discrimination or harassment, or who has supported someone else's complaint about discrimination or harassment, is also unlawful discrimination.

It is also unlawful discrimination to:

- treat a part-time worker less fairly than a comparable full-time colleague, unless that treatment can be justified by the needs of the organisation (as a proportionate means of achieving a legitimate aim); and
- treat a fixed-term employee less fairly than a comparable permanent colleague unless that treatment can be justified by the needs of the organisation (as a proportionate means of achieving a legitimate aim).

Part-time workers and fixed-term employees should also enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

This policy applies to prohibit all forms of unlawful discrimination in the workplace (which for home and hybrid workers includes their home), outside the workplace (when dealing with service users, families, suppliers, or other work-related professionals or when wearing a KORU ID badge), and on work-related trips or events including social events.

7. Our Responsibilities and approach

We aim to avoid discrimination in all aspects of employment and recruitment. Where relevant, our policies include reference to the importance of avoiding discrimination and other prohibited conduct. Our approach to different aspects of employment and recruitment is set out below.

7.1. Recruitment and selection

We aim to ensure that job requirements and job selection criteria are clear and based only on what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job.

We aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage particular groups, and which are not justified by the demands of the job.

For all jobs, we will draw up a clear and accurate job description and person specification to ensure that we remain focussed on what the job involves and the skills, experience and qualifications which are relevant and necessary to do the job. If a job can be done flexibly, we aim to say so in the job description. We will advertise all vacancies to a diverse section of the labour market, and we will ensure that job advertisements avoid stereotyping or using language that may discourage particular groups from applying. Short listing for interview will be done by two managers using a pre-agreed marking system that is applied fairly and consistently to all applicants. If we hold interviews, we will try to ensure that more than one person conducts them to ensure that we avoid unintentional bias.

We will not ask for personal or irrelevant information on application forms or in interviews. We will focus instead on whether someone has the relevant skills, qualities, and experience to do the job.

We are required by law to ensure that all employees are entitled to work in the UK. We will not make assumptions about immigration status based on appearance, name, accent, or other attributes that might suggest a particular nationality. We will carry out a right to work check on all prospective employees, regardless of nationality, before they commence employment.

7.2 Promotion, training, and appraisals

Promotion and training decisions will be made on the basis of merit. We will not unlawfully discriminate against any KORU representative in making promotion or training decisions. We believe all KORU representatives should have an equal opportunity to progress and develop.

We will advertise promotion opportunities widely, including deputising opportunities and secondments which could lead to permanent promotion. We will try to ensure that training and development opportunities are made known to all relevant KORU representatives.

We have a formal appraisal system which helps us to ensure that KORU representatives are being assessed fairly on the basis of job performance and are not being discriminated against. We will conduct appraisals objectively and measure performance in a transparent and objective way, without prejudice or bias.

For some recruitment and promotion exercises, we may take positive action to address under-representation in our workforce by encouraging applications from people from certain under-represented groups. For example, we may state on advertisements that we particularly welcome applications from certain groups, we may target our advertising towards particular groups, we might hold open days and work shadowing opportunities targeted at particular groups or we might provide training for particular groups to prepare them for promotion.

7.3. Working conditions and terms of employment

We will try to accommodate cultural or religious practices such as prayer requirements where we reasonably can. Separate fridge shelves can be organised for food that needs to be kept separate when working at a KORU venue. Our catering services (offered on specific training events) can cater for special dietary needs such as halal and kosher.

We operate a company dress code as set out in our Code of Conduct Policy. We encourage our dress code in a way that,

- respects the requirements of religion to the extent possible while complying with any health and safety requirements.
- Respects gender identity

We will ensure that decisions made under our Disciplinary and Grievance Policies are carried out fairly and without discrimination.

We will continue to carry out a regular review of our pay structures to ensure that they are fair and free from discrimination. We aim to ensure that our pay systems are transparent, fair, and free from discrimination.

7.4. Termination of employment

We will ensure that we avoid discrimination in making decisions about dismissal or redundancy.

Where possible, we will ensure that any decision to dismiss a KORU representative is endorsed by the director of the KORU Project CIC and the HR department. We will encourage leavers to give feedback about their employment in exit interviews.

7.5. Disabilities

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, we will make adjustments to accommodate you where possible and reasonable. For example, we can provide extra equipment or support, we can re-arrange duties and we can make changes to our premises in appropriate cases. With your input, we may wish to seek advice about possible adjustments from your doctor(s) and/or Occupational Health. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

7.6. Training on equalities

We will train all KORU representatives, especially those responsible for recruitment and promotion, on all elements of this policy, including understanding and avoiding discrimination and promoting equal opportunities.

7.7 Monitoring

We may ask job applicants and KORU representatives for information about some of their protected characteristics. We do this to help us to:

- establish whether our Equality, Diversity & Inclusion Policy is effective in practice.
- analyse the effect of other policies and practices on different groups.
- highlight possible inequalities and where appropriate investigate their underlying causes; and
- take action where we think it is needed to address problems or reduce disparities.

We collect this information on a no-names basis, and we will use it only for monitoring purposes and not for any other purpose. We will protect the confidentiality of the information given to us and will handle it in accordance with our obligations under data protection law.

Some examples of the type of monitoring we may carry out are as follows:

- how many people with particular protected characteristics apply for each job, are short listed and recruited.
- how many people in the workforce have a particular protected characteristic and the levels within the organisation that they are employed at, their length of service and their resignation rates and patterns.
- the protected characteristics of staff attending training.
- the satisfaction levels of staff with a particular protected characteristic; and
- the protected characteristics of employees using the Grievance Procedure or the Anti-Bullying Policy.

7.8 Your rights and responsibilities

You have the right not to experience unlawful discrimination at work. You also have a responsibility to understand this policy and help us to implement it.

You have a duty not to discriminate against anyone at or who accesses support through the KORU Project CIC and not to help anyone else do so. As part of this commitment, we expect you to respect a person's gender identity, name, and pronouns.

7.9 Fostering good relations

The KORU Project CIC aims to foster good relations between those who share a protected characteristic and those who do not share it by:

- Promoting tolerance, friendship and understanding of a range of religions and cultures
- Holding reflective groups for KORU representatives to learn from/ address relevant issues regarding discrimination.

- Working with our local community. This includes liaising with leaders of local faith groups to share/ speak at training events and activities based around the local community.
- Further developing links with people and groups who have specialist knowledge about particular characteristics, which helps inform and develop our approach.

You must not discriminate against any of the children, young people, adults at risk, families, and professionals who access and work in tandem with the KORU Project CIC. Equally, we expect those accessing support and working in partnership with the KORU Project CIC not to discriminate against you and we will take appropriate action if this occurs.

7.10. What to do if you have been discriminated against

If you believe you may have been discriminated against, please tell us. You can speak informally with the KORU DSL and/or HR manager. If you want to make a more formal complaint, you are encouraged to raise the matter through our Grievance Procedure. If you believe there has been any bullying or harassment, then you should raise the matter through our Anti-Bullying Policy and/or Whistleblowing Policy.

Allegations of potential breaches of this policy will be treated seriously. Individuals who make such allegations in good faith will not be victimised or treated less favourably 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 our Disciplinary Policy.

7.11. What will happen if you act in a discriminatory way?

Breaches of this policy will be dealt with in accordance with our Disciplinary Policy and you may be subject to disciplinary action up to and including dismissal.

8. Data protection

For information about our processing of personal data under this policy, including details of our legal grounds for doing so, how long we retain such personal data, who your personal data is shared with, your rights under data protection law and who you should contact if you have any concerns, please see our Data Protection Policy.

9. Policy review and promotion

We will promote and publicise our Equality, Diversity & Inclusion Policy as widely as possible using our website, application packs, induction packs, notice boards, handbooks, and annual reports.

We will review our Equality, Diversity & Inclusion Policy on an annual basis.

Review date: February 2025.

10. Related legislation and guidance

This document meets the requirements under the following legislation:

- [The Equality Act 2010](#), which introduced the Public Sector Equality Duty and protects people from discrimination
- [The Equality Act 2010 \(Specific Duties\) Regulations 2011](#), which require organizations to publish information to demonstrate how they are complying with the Public Sector Equality Duty and to publish equality objectives

This document is also based on Department for Education (DfE) guidance: [The Equality Act 2010 and schools](#).

11. Links to other relevant policies

This document links to the following KORU policies:

- Grievance Policy
- Whistleblowing Policy
- Disciplinary Policy
- Code of Conduct
- Anti-Bullying Policy
- Data Protection Policy