

EQUALITY, DIVERSITY AND INCLUSION POLICY

Equality, Diversity & Inclusion Policy Information			
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Policy update prepared by:	Diane Hicks		
Policy reviewed by:	Operations and Resources Committee		
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POLICY STATEMENT

This Equality, Diversity and Inclusion Statement and Equality, Diversity and Inclusion Policy reflect both the mission and purpose of Romsey Mill and the spirit and intentions of legislation which outlaws discrimination.

Romsey Mill will not unlawfully discriminate or subject any individual to less favourable treatment. In line with its values, Romsey Mill is committed to ensuring the fair and lawful treatment of its staff, programme participants, volunteers, contractors, consultants and suppliers, and the general public. The key legislation underpinning this policy, which Romsey Mill will have ongoing regard to, is outlined in Appendix 1.

Romsey Mill recognises that individuals and groups can encounter discrimination and that this can be damaging to individuals and society at large. Romsey Mill has a responsibility to combat all forms of prejudice including that relating to the nine protected characteristics:

- Age
- Disability (whether physical, sensory, learning, mental, or long-term health problem)
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race (including race, colour, ethnic or national origins)
- Religion and belief
- Sex
- Sexual orientation

We will ensure all staff members are made aware of the importance of understanding and respecting diversity and of the need to support and prepare children and young people for life in a pluralistic society.

It is the responsibility of all members of the Romsey Mill team to ensure the practical application of this policy. Romsey Mill also recognises that certain responsibilities will fall on its management to provide appropriate coordination and training.

1. AIMS OF THE POLICY

The policy aims to challenge discrimination in all areas of our organisation. We aim to ensure that Romsey Mill reflects and meets the needs of the local community and incorporates equal opportunities into all areas of our work.

2. DEFINITIONS

Discrimination = any unlawful discrimination

Although there may be circumstances justifying different treatment, which are not unlawful (for example to comply with an occupational requirement for a position), Romsey Mill will not tolerate unlawful discrimination and/or harassment on the grounds of an individual's sex, race, marital status, colour, ethnic or national origin, disability, gender reassignment, sexual orientation, age, religion and other beliefs, pregnancy and maternity, Union membership, Union activities, or employment status. Any reference to discrimination in this policy includes all such possible grounds. Indirect discrimination is when there's a practice, policy or rule which applies to everyone in the same way, but it has a worse effect on some people than others.

3. STATEMENT OF INTENT

The Equality Act became law in October 2010. It replaced previous legislation (such as the Race Relations Act 1976 and the Disability Discrimination Act 1995) and ensures consistency in what employers and employees need to do to make their workplaces a fair environment and comply with the law.

We are committed to ensuring that no existing or potential Programme Participant, worker, volunteer, or member receives less favourable treatment or service than any other on the grounds of sex/gender, race, colour, nationality, ethnic or national origin, language, religion/religious belief, marital status, sexual orientation, age, pregnancy/maternity, class, sensory/physical or mental disability, socio-economic/employment status, size, appearance, HIV positive status, inapplicable criminal record, or is disadvantaged by conditions or requirements which are not justified in terms of the job to be done or service to be offered.

We recognise that discrimination occurs when services fail to respond to variations in need arising from these different characteristics directly or indirectly, and when people are denied essential services or training opportunities because of the inability to pay for them. The outcome of such a failure is that people suffer hostility, deprivation, and material disadvantage.

Accordingly, we are strongly committed to counter discrimination in all aspects of our work – in our practice as employers, in the way we work with other organisations, and in all our work with Programme Participants.

4. SCOPE

This policy applies to the whole of Romsey Mill at all levels of the organisation, and across all policies and programme areas especially with regard to:

- Implementation
- Governance
- Employment & Recruitment
- Programme Participant & Community Involvement
- Tackling Discrimination & Harassment
- Programme Planning & Provision of services
- Procurement
- Promoting Social Inclusion & Community Cohesion
- Partnerships
- Responsibilities
- Monitoring & Review
- Complaints & Redress

5. IMPLEMENTATION

We recognise that a policy will not in itself provide equality of opportunity. Romsey Mill therefore intends to implement a positive programme of action to challenge all forms of direct or indirect discrimination in its practices, and in the provision of its services. Romsey Mill will also use its influence to change attitudes and behaviours that reinforce oppression.

We recognise that active participation of existing or potential Programme Participants, workers, volunteers, or members is necessary in order for discrimination to be challenged. Romsey Mill is committed to encouraging active involvement so that all existing or potential Programme Participants, workers, volunteers, or members of the group are part of the process of defining and directing its work by monitoring its effectiveness in doing this. Romsey Mill will consistently question its approach to practices, its work, and attitudes, to ensure the full involvement of people from oppressed groups.

6 GOVERNANCE

Membership of Romsey Mill is a legal requirement for Trustees as part of our status as a company limited by guarantee. Trustees need to be in accord with Romsey Mill Trust's Statement of Faith to hold office.

Romsey Mill will aim to have a governing body and management and accountability structures which understands and reflects the diversity of its local populations and communities.

Trustees will receive Equality, Diversity and Inclusion training as required. The Board will select a member to have the EDI brief (usually the chair of the Operations and Resources Committee).

7 RECRUITMENT AND EMPLOYMENT

7.1 Staff & Volunteer Recruitment

Romsey Mill will work to ensure it recruits staff in a fair and open manner to achieve a diverse workforce. Romsey Mill seeks to achieve equality of treatment for job applicants.

After taking into account any occupational requirement, entry into employment and promotion or change of post within Romsey Mill is determined by personal merit, suitability, and ability or potential ability, relevant to the mission and purpose of Romsey Mill.

The policy applies to the advertisement of all posts and the recruitment and appointment to these posts unless specifically exempted (see below).

Romsey Mill aims to ensure that people with disabilities are given equal opportunity to enter employment. In so doing, it will fully consider making reasonable adjustments to working practices, equipment, and premises to ensure that a disabled person is not put at a substantial disadvantage due to their disability. In addition, when staff members become disabled in the course of their employment, every effort will be made through reasonable adjustment, retraining or redeployment to enable them to remain in the employment of Romsey Mill.

The recruitment of volunteers will also be in accordance with the main principles of this policy.

7.2 Recruitment of the Chief Executive

The recruitment procedure for the Chief Executive will be decided by a special panel, appointed by the Board, when a vacancy occurs or is anticipated. The Panel will take account of the principles of best practice and legislation at that time and make a decision in accordance with the main principles of this policy.

7.3 Exemptions

The Memorandum and Articles of Romsey Mill express its ethos as a Christian organisation. Accordingly, all those in roles which are assessed to be central

in promoting Romsey Mill's Christian ethos and enabling people to experience, explore and express the faith-based motivation of its work, (where there is an occupational requirement for a particular post) are required to demonstrate a commitment to the Christian faith. However, such exemptions to this policy must be compliant with guidance issued by the Equality and Human Rights Commission.

On occasions, Romsey Mill may be required to restrict recruitment based on other occupational requirements for a particular post. Again, such exemptions to this policy must be compliant with guidance issued by the Equality and Human Rights Commission.

7.4 Terms, Conditions & Requirements

Romsey Mill is committed to ensuring that rates of pay and other terms and conditions of employment are fairly applied without regard to sex, race, marital status, etc. Unless there can be justification on the grounds of business need, it is unlawful to impose a condition or requirement on any post where such a condition would have an adverse impact on an employee (or prospective employee) on account of their sex, race, marital status etc.

7.5 Staff Support & Development

Romsey Mill will promote awareness of its Equality, Diversity and Inclusion Policy and of the practices which will advance its implementation. This will include promoting greater awareness of the varying needs of those from different backgrounds (e.g., by the use of positive images, play equipment, games etc), and by valuing different cultural identities through anti-racist activities and resources. Positive anti-sexist and anti-discriminatory values will be integral to all programmes of activities.

Up-to-date equality, diversity and inclusion information will be available to all committee members, volunteers, and staff. Appropriate training sessions will be offered to all committee members, volunteers, and staff in these areas. Employees of Romsey Mill will be required to undertake specific EDI training. Romsey Mill will provide appropriate and regular supervision and support to all staff members; these supervision sessions will include time to discuss any equality, diversity, and inclusion matters.

7.6 Reasonable Adjustments for Employees with Disabilities

Employees who are disabled or become disabled in the course of their employment are encouraged to inform Romsey Mill of the fact. They may also wish to advise Romsey Mill of any reasonable adjustments to their employment or working conditions which they consider necessary, or which they consider would assist them in the performance of their duties. Consideration will be given to such proposals and, where it is reasonably practicable, such adjustments will be made.

7.7 Review of Human Resources Practices

The criteria and procedures for recruitment, selection, promotion and staff development will be reviewed from time to time to ensure this policy is being implemented. A system will be operated to keep records of gender, ethnic origin, and any disability of applicants in order to help us monitor the effectiveness of this Equality, Diversity and Inclusion Policy.

8.0 PROGRAMME PARTICIPANT & COMMUNITY INVOLVEMENT

8.1 Programme Participant Feedback

Romsey Mill will ensure that appropriate feedback mechanisms (e.g., focus groups, surveys, the compliments and complaints form) are available to all Programme Participants.

8.2 Programme Participant Involvement (including parents and carers)

Romsey Mill will from time to time inform all Programme Participants of the opportunities for participation in service delivery, planning and development. This information will be provided in translation or other formats where there is an identifiable need to do so.

As part of a commitment to beneficiary participation, Romsey Mill will encourage involvement of people from minority communities. Where required, Romsey Mill will facilitate training or personal development activities to strengthen participation.

8.3 Family and Community Engagement

Romsey Mill wants to be an open and welcoming organisation at the heart of the community where our programme and learning opportunities are accessible and enjoyable for young people, children and those who care for them. We will engage with parents and carers, community groups, voluntary sector organisations, faith groups, local councils, other statutory bodies and wider stakeholders as part of the process of developing and accessing policy and practice.

9.0 TACKLING DISCRIMINATION & HARASSMENT

It is the responsibility of every individual, both staff and volunteer, to eliminate discrimination by ensuring the practical application of the Equality, Diversity

and Inclusion policy and reporting incidents of discrimination to an appropriate senior person.

Discrimination or harassment in any form is not acceptable. Romsey Mill will take prompt action to deal with cases brought to its attention. Romsey Mill will offer appropriate support to programme participants and staff experiencing harassment and will undertake to agree any action with them first.

Romsey Mill will work in partnership with the police, local authorities and other agencies to prevent harassment in the community and to encourage its reporting. Romsey Mill will monitor any harassment for specific discriminatory components and will report incidents to the Board of Trustees. Romsey Mill will keep a record of incidents concerning harassment and discriminatory motivated incidents.

9.1 Discrimination & Harassment of Staff and Volunteers

Romsey Mill will ensure that staff and volunteers feel able to raise complaints of discrimination or harassment and that no individual will be penalised for doing so unless it is untrue and made in bad faith. Complaints will be dealt with in accordance with the Grievance Procedure and/or Whistle-blowing Policy. Romsey Mill is committed to protecting staff from harassment by other staff, by Programme Participants and by others, and will take appropriate action against perpetrators in agreement with staff concerned.

9.2 Discrimination & Harassment by Staff

Any employee who harasses any other employee, volunteer, agent or Programme Participant, or whose conduct or actions are inconsistent with Romsey Mill's commitment to equality, diversity and inclusion, will be subject to the organisation's disciplinary procedure. In serious cases, such behaviour will be deemed to constitute gross misconduct and, as such, will result in summary dismissal in the absence of mitigating circumstances.

It is a requirement for all staff to engage in any Equality, Diversity, and Inclusion training which Romsey Mill organises.

9.3 Discrimination & Harassment of Programme Participants

Romsey Mill will ensure that Programme Participants feel able to raise complaints of discrimination or harassment and that there are no barriers for minority groups to do so. Complaints will be dealt with in accordance with the Complaints Procedure.

Romsey Mill is committed to protecting Programme Participants from harassment by others and will take appropriate action in agreement with the Programme Participant(s) concerned under the Disciplinary Policy (where staff are the perpetrators). Where perpetrators have no formal link to the

association, we will work with other agencies to ensure our Programme Participants are protected from further incidents.

9.4 Incidents of discrimination

Romsey Mill will not tolerate incidents of discrimination against its staff, agents or Programme Participants and we will work with those experiencing behaviour such as abuse, intimidation, harassment, or violence. Romsey Mill will keep a record of discriminatory incidents and how they have been dealt with.

10.0 PROGRAMME PLANNING & PROVISION

Romsey Mill will provide activities and services appropriate to the diverse needs of individuals in the community and is committed to ensuring fair access and fair treatment for all programme participants and potential programme participants, irrespective of background. Ensuring ease of access to premises and to programme, for those with disabilities, will particularly be taken into consideration through Access Audits. Where possible, office premises will endeavour to respect and acknowledge the need for staff to have a private place for privacy, prayer or quiet contemplation.

Proactive engagement with programme participants (including parents and carers), representatives from minority groups will be encouraged in the designing and planning of programmes and services.

Where the profile of Programme Participants for a particular activity or service is at variance with the local community Romsey Mill serves, action will be taken to address any under representation or imbalance.

10.1 Positive Activities, Support & Education

Romsey Mill is committed to ensuring equality of access to its activities and services and is also committed to ensuring that they are appropriately tailored to an individual's needs. We will ensure that referral agencies, community groups and the general public have access to information about our services.

All children are encouraged to become responsible for their own learning. The support and activities we provide are responsive to participants' different learning styles in order to help all to engage.

Staff ensure that the rooms are an inclusive environment in which young people, children and families feel all contributions are valued. Where groups or individuals are marginalised, staff take positive steps to include them.

Teaching styles include collaborative learning so that young people, children, and parents/carers appreciate the value of working together. All participants are encouraged to question, discuss and collaborate in tasks.

Staff challenge stereotypes and foster participants' critical awareness and concepts of fairness.

Resources and displays will reflect the experience and backgrounds of participants, promote diversity and challenge stereotypes in all areas. All resources are reviewed regularly to ensure they reflect the inclusive ethos of Romsey Mill.

Where programmes and activities follow a curriculum (e.g., Pre-School and Alternative Education) each area of the curriculum is planned to incorporate the principles of equality and to promote positive attitudes.

The curriculums build on learners' starting points and are differentiated appropriately:

- for learners with English as an additional language
- for learners from minority ethnic groups, where necessary
- for learners with Special Educational Needs

The content of the curriculum reflects and values equality, diversity and inclusion. The curriculum encourages learners to explore bias and to challenge prejudice and stereotypes. The whole curriculum contributes to the spiritual, moral, social and cultural development of all participants.

Special events cater for the interests and capabilities of all learners and take account of parental concerns related to religion and culture.

10.2 Admission and Inclusion

Please refer to our separate Admissions Policy and SEND Policy.

10.3 Reviewing Services

Service reviews will take into account equality, inclusion and fair access to services. Wherever possible, Programme Participants, particularly those from minority groups, will be encouraged to give their views and identify their priorities for service delivery and improvement.

11.0 PROCUREMENT

Where relevant, we will advise partners, consultants and other agencies working for Romsey Mill of our commitment to equality, diversity and inclusion and we will request details of their own equal policy and practices, or an undertaking that they agree to abide by Romsey Mill's Equality, Diversity, and Inclusion Policy. Romsey Mill requires that all partners and their subcontractors, and contractors and consultants who are employed by Romsey Mill, treat staff and Programme Participants in a fair and non-discriminatory manner.

Complaints of discrimination or harassment by a partner, consultant, or other agency staff, against a Programme Participant or a member of Romsey Mill staff will be brought to the attention of the CEO. If the complaint is founded, Romsey Mill will insist that the perpetrator does not work within any of the charity's buildings or programme.

12.0 PROMOTING SOCIAL INCLUSION & COMMUNITY COHESION

Romsey Mill is committed to promoting social inclusion and will actively seek to work with individuals, communities, and organisations to integrate marginalised people back into society (including mainstream health services, housing and employment) so that they can fulfil their potential.

Romsey Mill is also committed to promoting community cohesion in the areas where it operates. Factors such as age, wealth, ethnicity, religion and political ideology, sexual orientation can create divisions in communities. Romsey Mill has an important role to play to work with its partners to promote interaction between people and foster positive community relations. Romsey Mill will also seek to promote the needs of local minority groups in its contribution to local community strategies. Romsey Mill will endeavour to work with organisations representing minority groups in order to develop services and promote equality.

13.0 PARTNERSHIPS

Where Romsey Mill wishes to provide services in partnership with other agencies, any contracting or service level agreements or management agreements will cover equality, diversity and inclusion issues at all levels of service delivery.

14.0 RESPONSIBILITIES

Our Trustees are responsible for:

- making sure the organisation complies with all current equality legislation
- approving and adopting the Equality, Diversity, and Inclusion Policy for Romsey Mill
- overseeing the evaluation of its work and record, as an employer of workers and volunteers and as a service provider

The Chief Executive Officer is responsible for:

- making sure the policy is readily available and that the trustees, staff and Programme Participants know about it

- ensuring that the Equality, Diversity and Inclusion Policy and procedures are carried out
- producing regular information for trustees and staff about the policy and how it is working and arranging training for them on the policy, if necessary
- making sure all staff know their responsibilities and receive training and support in carrying these out
- taking appropriate action in cases of harassment and discrimination

All our staff are responsible for:

- functional responsibility for the day-to-day operation of this policy
- dealing with discriminatory incidents (e.g., racist, sexist, homophobic incidents) and being able to recognise and tackle bias and stereotyping
- promoting equality and good community relations
- avoiding discrimination against anyone for reasons of race, colour, nationality, ethnic or national origins, gender, disability, religion or belief, sexual orientation, or socio-economic circumstances
- keeping up to date with the law on discrimination and taking training and learning opportunities

Visitors and contractors are responsible for:

- knowing and following our Equality, Diversity, and Inclusion Policy

Immediate responsibility for overseeing and championing equality practices at Romsey Mill lies with a named member of staff and a Trustee. Responsibilities include:

- co-ordinating and monitoring work on equality issues
- dealing with and monitoring reports of harassment (including racist and homophobic incidents)
- monitoring the engagement and progress of vulnerable groups of young people, children and families

The persons currently responsible for championing equality are Neil Perry (CEO) and Angela Single (Chair of Trustees).

15.0 MONITORING & REVIEW

The Trustees will receive reports on issues arising from the implementation of this policy with regard to:

- Harassment and discriminatory incidents
- Feedback as recorded through staff supervisions and work reviews.

The composition of job applicants and the workforce will be monitored on an ongoing basis. As required, the CEO will report to the Operations & Resources Committee on equality, diversity and inclusion performance issues including:

- Response to applications
- Appointments

- Promotion
- Retention
- Harassment
- Grievance and disciplinary issues
- Employee feedback

All proposals for forming or changing policies will take into account the implications for promoting or maintaining equality, diversity and inclusion for Programme Participants and staff members / volunteers.

Romsey Mill will consult with those who have a particular knowledge and understanding of the issues, including people who are potential victims of discrimination, on how to make our work more relevant to those facing discrimination.

16.0 COMPLAINTS & REDRESS

Romsey Mill is committed to taking positive action to address potential discrimination or any barriers to service access. Staff, prospective staff, Programme Participants, and others have the right to take complaints of unfair treatment or failure to follow legal or regulatory obligations to an appropriate external body, once complaints have been fully investigated internally, unless the Whistle-blowing Policy needs to be invoked.

17.0 LEGAL AND REGULATORY FRAMEWORK UNDERPINNING THIS POLICY

Romsey Mill will have regard to all legal and regulatory duties concerning Equality & Diversity in carrying out its activities.

Romsey Mill will also have regard to any regulatory requirements of relevant organisations involved in the commissioning and/or regulation of our services.