



EQUITY, DIVERSITY & INCLUSION POLICY

Adopted in May 07.....

The policy is to be reviewed yearly, next review is December 2025

The name of the designated person is NR.....

Purpose

1.1 As a community based organisation SkyWay Charity has long been committed to promoting Equity, diversity and inclusion and consequently promoting a culture that actively values difference and recognises that people from different backgrounds and who have different experiences enrich our organisation and enhance the way we work.

1.2 SkyWay aims to be an inclusive organisation, where diversity is valued, discrimination, bias and oppression are challenged, and critical thinking and self analysis are part of the culture. We aim to:

- recruit and retain a diverse workforce that reflects the communities we serve (including Equity of opportunity & facilities provided to our diverse workforce and job applicants)
- take action to create a Trustee board which is reflective of the community we serve and also work to embed inclusive practices, making all decisions with equity, diversity and inclusion at its core.
- create an environment where barriers to participation in any form are addressed
- create a safe and welcoming atmosphere for everyone. We want to challenge all forms of oppression within our organisation and services
- design our activities, services and decision making processes specifically to encourage and support participation from people who face disadvantage in society, including women, disabled people, people from black and global majority communities and people on low incomes

1.3 SkyWay is also committed to compliance with relevant Equality legislation, the Equality Act 2010 and our own Code of Conducts (staff, volunteers. Trustees and young people and community members)

1.3 SkyWay aims to proactively tackle discrimination or disadvantage and to ensure that no individual or group is directly or indirectly discriminated against for any reason to employment or accessing its services.

1.4 However, SkyWay is also mindful of the provision in discrimination law for the rare circumstances when an organisation may need to justify discrimination rather than have a disproportionate effect. This could be, for instance, where there is a conflict with other legislation which SkyWay needs to comply with or between service needs. If these circumstances arise, a thorough assessment and objective justification of any decision will be carried out in order to demonstrate that the provision, criterion or practice is a proportionate means of achieving a legitimate aim.

2. The Definition of Equity, Diversity & Inclusion

2.1 Equity recognises that everyone doesn't begin in the same place in society. Some people face adverse conditions and circumstances making it more challenging with the same effort to achieve the same goals. Equity advocates for those who may have been historically disadvantaged, making it difficult for them to be successful. What is "fair" as it relates to equity isn't a question of what is the same but rather the point from which a person begins. Equity takes into account historical and other factors in determining what is fair.

2.2 Diversity means having differences within an organisation or setting. Diversity recognises we are all different in many ways. People with differing identities, backgrounds and experiences should all have equitable access to resources and decision-making. Some people prefer to use the term 'representation' to focus on how organisations should be reflective of the society we live in and the communities we serve.

2.3 Inclusion means being proactive to make sure people of different backgrounds, experiences and identities feel welcomed, respected and fully able to participate. It is not only about creating a diverse environment but also about making sure that a culture exists where individuals can be their full selves.

3. Scope

3.1 This policy applies to the workforce of SkyWay Charity which includes staff, sessional workers, peers and volunteers, Trustees, all job applicants regarding recruitment and the young people and communities that come in contact with or use our services.

3.3 This policy applies also to sub-contractors. SkyWay will monitor the performance of contractors and/or third parties and take all necessary steps to ensure good performance and compliance with appropriate behaviours. However, if any issues become apparent with regards to diversity, equity or inclusion in relation to any contractor or third party, these will be taken very seriously by SkyWay and raised in the strongest possible terms with the contractor or third party.

4. Policy statement

4.1 SkyWay is committed to promoting equity of opportunity, eliminating unlawful discrimination and promoting inclusion within our workplace and service delivery. We will seek to protect the right of everyone not to be discriminated against and work to ensure equity of opportunity for all within our service and workforce.

We acknowledge and respect the fundamental human right of every person not to be discriminated against on the grounds of race (includes colour, nationality and ethnic origins), religion or belief, sex, gender reassignment or gender identity, sexual orientation, disability, pregnancy and maternity, age and marital status. We also recognise that people can be disadvantaged by their social and economic circumstances i.e social class. We will also work to eliminate discrimination and disadvantage caused by social class within our workplace and services.

Direct and / or indirect discrimination, harassment or victimisation will not be tolerated within the workplace, or in the way we deliver services.

In addition, existing members of staff, job applicants, or workers are treated fairly in an environment which is free from any form of discrimination relating to: caring responsibilities, part-time employment, membership or non-membership of a trade union or spent convictions.

- o all employment-related policies, practices and procedures are applied impartially and objectively;

- o Equity of opportunity to all and to provide staff with the opportunity to develop and realise their full potential;
- o that SkyWay works towards achieving a diverse workforce at all levels
- o that employees of SkyWay can work in an atmosphere of dignity and respect.

4.2 The Equity, Diversity and Inclusion policy provides a clear framework for translating our policy into action. It outlines the responsibilities of the Board, CEO/ Directors, managers and individuals to comply with the Equality Act 2010. Management, Trustees and staff are strongly committed to its full and active implementation.

4.3 SkyWay will not tolerate processes, attitudes and behaviour that amounts to direct discrimination, associative discrimination, discrimination by perception, indirect discrimination including harassment (harassment by a third party), victimisation and bullying through prejudice, ignorance, thoughtlessness and stereotyping.

4.4 SkyWay recognises the importance of monitoring, reviewing and reporting on its equity, diversity & inclusion policy and practice and to measure progress in meeting our policy statement.

5. Equity, Diversity and Inclusion within our Workforce

5.1 Practical support for a diverse workforce

As an employer committed to diversity, equity & inclusion SkyWay recognises its success depends on creating an environment which supports the diverse make-up of its staff with supporting policies and procedures to create a framework of assistance as required.

5.2. Work/life balance

SkyWay is committed to employees who have commitments outside work, irrespective of whether they have caring responsibilities. SkyWay is committed to helping its employees fulfil their potential at work whilst finding the right work/life balance by offering flexible working hours and opportunities to job share where appropriate.

5.3 Human Resources policies

All relevant policies such as the Recruitment Policy, Redundancy policy, the performance management process and hours of work, are designed to promote equal opportunity and protection against discrimination for all employees.

5.4. Staff and Volunteer Training

5.4i) SkyWay is committed to ensuring its staff and managers are trained in equity, diversity and inclusion and aims to ensure that adequate training is provided so that managers can operate this policy. Examples include specific training on race, gender, gender identity, disability, sexuality, age and religion or belief, in accordance with the requirements of the law and good practice.

5.4i) Diversity, Equity and Inclusion forms an integral part of SkyWay's induction package. Managers are to ensure that all new entrants are made aware of our Equity, Diversity and Inclusion Policy and Harassment, Bullying and Discrimination policy.

6. Equity, Diversity and Inclusion within our services

Equity of opportunity and improving life chances are at the heart of what we do at SkyWay Charity. We're committed to finding innovative ways to provide excellent services and encourage social cohesion for our young people and local communities. We look to embed equity, diversity and inclusion into service design, delivery and practice.

We see how racial, economic, class-based, religious, gender-based, authoritarian, and social oppression can intersect resulting in our young people and communities facing bias, oppression and discrimination in their education, health and social interactions and outcomes. So we provide a service and space where these imbalances are recognised and accounted for.

8. Review and monitoring

8.1 SkyWay undertakes monitoring that is used to inform and improve our employment and service practices. If through monitoring any discrimination is identified SkyWay will take corrective action to eliminate it and assess progress in achieving these targets

9. Discrimination

9.1 Discrimination may take seven main forms and is defined in law along with the protective characteristics associated with each provision as listed below:

- **Direct Discrimination** occurs when someone is treated less favourably than another person because of a protected characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage & civil partnership, pregnancy and maternity. For example, a manager does not select a pregnant woman for promotion even though they meet all of the competencies. This may be direct discrimination and cannot be justified.
- **Associative discrimination** occurs when someone discriminates against someone because they associate with another person who possesses a protected characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation. An example of this is when a manager does not give a job-applicant the role, even though they have met all of the competencies for the role, because the applicant informs the employer they have a disabled partner. This may be associative discrimination because of disability by association.
- **Discrimination by perception** occurs when someone discriminates against an individual because they think they possess a protected characteristic. It applies even if the person does not actually possess that characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation. An example of this is when a manager selects a person for redundancy because they incorrectly think they have a progressive condition (i.e. that they are a disabled person). This is probably discrimination by perception because they believe the individual is disabled.
- **Indirect discrimination** occurs when a seemingly neutral provision, criterion or practice that applies to everyone places a group who share a characteristic e.g. type of disability at a disadvantage. Indirect discrimination may be justified if it can be shown that the provision, criterion or practice is a proportionate means of achieving a legitimate aim. An example of this is when an employer decides to apply a “no hats or headgear” rule to staff. If this rule is applied in exactly the same way to every member of staff, then staff who may cover their heads as part of their religion or cultural background (such as Sikhs, Jews, Muslims and Rastafarians) will not be able to meet this requirement of the dress code and may face disciplinary action as a result. Unless the employer can objectively justify using the rule, this will be indirect discrimination. Relevant protected characteristic includes age, marriage and civil partnership, race, religion or belief, sex and sexual

orientation. In addition, the Act extends protection against unjustified indirect discrimination to gender reassignment and disability.

- **Dual Discrimination** / Intersectionality occurs when someone is treated less favourably because of a combination of two relevant protected characteristics (Dual discrimination). This means that it will be possible for a job applicant for example to claim that they have been treated less favourably not just because of their race but also because of their gender. For example, because the individual is an Asian woman. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex and sexual orientation. Whereas intersectionality refers to the interconnected nature of categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.
- **Detriment arising from a disability arises when you treat a disabled person unfavourably because of something connected with their disability.** This type of discrimination is unlawful where the employer or other person acting for the employer knows, or could reasonably be expected to know, that the person had a disability. This type of discrimination is only lawful if the action can be justified and the employer can show that is a proportionate means of achieving a legitimate aim. An example of this is when an employer imposes a “no beards” rule as a part of a dress code and tells staff they will be disciplined if they do not comply. The employee is a disabled person who has a skin condition which makes shaving very painful. They have been treated unfavourably (threat of disciplinary action) because of something arising from their disability (their inability to shave). Unless the employer can objectively justify the requirement, this may be a detriment arising from a disability. It may also be a failure to make a reasonable adjustment.
- **Victimisation** occurs when an employer is treated unfavourably, disadvantaged or subjected to a detriment because they have made or supported a complaint of discrimination or raised a grievance under the Equality Act, this policy or the Harassment, Bullying and Discrimination policy or because they are suspected of doing so. (However, an employee is not protected from victimisation if they have maliciously made or supported an untrue complaint). An example of this is when an employee requests to work flexibly and their manager refuses their request because they supported a colleague in a complaint of discrimination.
- **Third party harassment** occurs when an employee is harassed by someone who does not work for the employing organisation such as a customer, visitors, client, contractor or visitors from another organisation. The employer will become legally responsible if they know an employee has been harassed on two or more occasions by someone and it may also be different individuals each time and fails to take reasonable steps to protect the employee from further harassment.

10. Complaints of Discrimination

10.1 SkyWay takes all claims of discrimination very seriously and will take appropriate action against those concerned. Discrimination occurs when someone directly or indirectly treats a person or a group of people unfavourably because of a protected characteristic of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. This covers all behaviour including remarks and insinuation, both verbal and non-verbal, which cause offence.

Staff who wish to raise complaints or grievances related to discrimination are encouraged to do so through our established **Grievance Policy**. This policy provides a clear, confidential,

and impartial process for reporting concerns. Complaints can be submitted verbally or in writing to Natalie Roast, CEO. All concerns will be addressed promptly, fairly, and in line with our commitment to maintaining a workplace free from discrimination, harassment, and bias.

Stakeholders who wish to raise complaints or grievances related to discrimination are encouraged to do so through our established **Complaints Policy**.

11. Responsibility

11.1 All staff have a responsibility to guard against any form of discrimination and avoid any action which goes against the spirit of this policy. We actively encourage **critical thinking, self-analysis and recognising, identifying and challenging bias**.

Thus, staff at all levels must ensure that there is no discrimination in any of their decisions or behaviour. This includes the provision that all staff must:

- report any suspected discriminatory acts or practices;
- not induce or attempt to induce others to practise unlawful discrimination;
- co-operate with any measures introduced to ensure equity of opportunity;
- not victimise anyone because of them having complained about, reported or provided evidence of discrimination;
- not harass, abuse or intimidate others.
- Challenge bias or discrimination in our services and provide safe spaces to discuss prejudice and discrimination

11.2 However, whilst all staff have a collective responsibility to ensure this policy is successfully implemented, there are also specific responsibilities within this.

The Board, Chief Executive and the Management Team are:

- Providing leadership on the equity, diversity and Inclusion strategy and policy, acting as overall champions to ensure the policy is implemented;
- Communicating the strategy and policy, internally and externally.

Managers at all levels are responsible for:

- Implementing the policy as part of their day-to day management of staff and in applying employment policies and practices in a fair and equitable way
- Implementing the policy as part of the SkyWay service, ensuring we embed equity, diversity and inclusion into service design, delivery and practice.
- Ensuring equity, diversity and inclusion concerns are addressed in staff / volunteer performance.
- Ensuring all staff / volunteers act in accordance with the equity, diversity and inclusion policy providing necessary support and direction;
- Effectively manage and deal promptly when investigating issues relating to potential discrimination, including those matters concerning members of the public.

Each employee is responsible for:

- Implementing the policy in their day-to-day work and their dealings with others including service users
- Ensuring their behaviour is appropriate to the policy and that they treat people with respect and dignity;
- Not discriminating against other employees or service users
- Notifying their line manager of any concerns regarding the conduct of other employees, service users, the public or third parties where they feel they are not able to challenge and resolve problems

12. Non- Compliance with Policy - SkyWay will not tolerate any behaviour from staff which breaches our equity, diversity and inclusion policy.

Failure to uphold the guidelines in the policy may lead to disciplinary action being started.

13. Policy Dissemination

The Equity, diversity and inclusion policy is communicated effectively to all stakeholders to ensure a shared understanding and consistent implementation. It is made available to all employees, volunteers, and relevant third parties through multiple channels, including the organisation's website, internal communication platforms, and staff handbooks. New staff and volunteers are provided with the policy as part of their induction process, accompanied by mandatory training to ensure they fully understand their responsibilities. Refresher training and updates are conducted to address any changes or reinforce key aspects of the policy. A hard copy of the policy is accessible in communal areas.