

### **Commitment to equality, diversity and fairness:**

CiC is committed to equality of opportunity and fairness in the delivery of our services and in our capacity as an employer. We believe that this commitment must extend beyond legislative compliance and address both the business case for diversity as well as the moral case for ensuring equality of opportunity and fairness for all.

CiC recognises that due to the nature of our work nationally and internationally, it is important to reflect the diverse culture across the UK and beyond. It is therefore important that we have a broad range of cultures, languages and backgrounds in order to accommodate the needs of our clients. We actively monitor our workforce and network to be sure we have a proper representation of the population at large available to us. The treatment of our workforce is governed by a separate equal opportunities policy.

CiC recognises that certain groups and individuals in society are disadvantaged because of discrimination experienced. We seek to ensure that CiC respects and includes everyone and that no member of the Management Board, member of staff, counsellor engaged to work with CiC or client receives less favourable treatment on the basis of a protected characteristic e.g.

- Age
- Disability and/or medical conditions
- Marital status (including civil partnership)
- Race, language, ethnic or national origins
- Religion or belief
- Gender
- Sexual orientation
- Gender Reassignment
- Pregnancy or maternity

CiC recognises that there may be other areas where people experience discrimination and will work towards an anti-discriminatory environment, based on an open discussion with members of the Management Board, members of staff, counsellors engaged to work with CiC and clients on perceptions of discrimination.

CiC further recognises that discrimination can be direct or indirect and take place at both institutional and personal levels. CiC believes that such discrimination is unacceptable and we are committed to providing equality of opportunity for all by eliminating unwarranted and unlawful discrimination. We will do this by ensuring that our practices reflect relevant legislation and good practice.

### **UK – Public Sector Equality Duty:**

Working with a number of public sector organisations within the UK, CiC recognises that statutory bodies have additional responsibilities placed upon them by the General Equality Duty within the Equality Act 2010 (see appendix A). CiC also understands that statutory bodies are subject to a number of specific duties created under the general duty and that these vary between England, Scotland, Wales and Northern Ireland.

When working with public sector organisations in the UK CiC will work in a manner that supports the main aims of the General Equality Duty. These being to:

- Eliminate unlawful discrimination, harassment and victimisations on the grounds of age, disability, gender, gender reassignment, race, religion and belief and sexual orientation.
- Advance equality of opportunity.
- Foster good relations between different communities.

### **Information and training:**

All new starters within CiC receive a full brief regarding their individual equality and diversity responsibilities during their induction. A copy of the Equality & Diversity Policy and the Equal Opportunity Policy is available to them at that time and for the duration of the time they are with CiC.

New updates on equality and diversity issues are circulated to the whole workforce via email.

All self-employed counsellors engaged by CiC are made aware of our Equality & Diversity Policy and of the expectation that they will act in a manner which complies with the policy whilst working on behalf of the Company.

Members of the workforce and self-employed counsellors, engaged by CiC to work with Public Sector Organisations within the UK are made aware of the requirements of the General Equality Duty under the Equality Act 2010.

CiC's training objectives will be to continue to ensure that:

- Those employees with specific staff responsibilities are aware of current legal requirements, standards of good practice and the practical implications of the Company's Equality & Diversity Policy and Equal Opportunity Policy.
- The specific training needs of employees are identified and met in order to enhance their opportunities for career development.

### **Assessment of impact of policies and processes:**

Although CiC has no written equality impact assessment policy it has, and will continue to carryout assessments of the impact of its policies and processes where it is felt to be appropriate to do so. The assessments will examine the positive and negative impacts on those with protected characteristics and others considered vulnerable. These assessments will be carried out in a manner which is open and fair.

### **Reasonable Adjustments**

CiC will monitor individual requirements under the Equality Act 2010 and will make reasonable adjustments as required to ensure the main aims of the General Equality Duty are adhered to.

Workplace adjustments can be temporary or made on a permanent basis and will cover:

- working arrangements
- premises
- adjustments to a job

Examples of reasonable adjustments are in Appendix C

### **Governance:**

Kate Nowlan, the Chief Executive of CiC has overall executive responsibility for equality and diversity within the Company.

The Management Board has oversight and responsibility for the application of the Equality & Diversity and the Equal Opportunity Policies.

### **Individual Responsibility:**

It is the duty of all employees, counsellors, trainers and coaches to accept their personal responsibility for the practical application of the Company's Equality & Diversity Policy, but at the same time the Company acknowledges that specific responsibilities fall upon Line Managers and Supervisors.

It is the duty of all employees, counsellors, trainers and coaches to challenge and report bullying, harassment, discrimination and unacceptable behaviour.

It is the duty of all employees, counsellors, trainers and coaches to seek support and advice as needed, to deal with equality and diversity issues in their day-to-day work.

All counsellors, trainers and coaches are expected to comply with the overall ethos of the policy in their dealings with individual clients, customers and with employees of CiC.

### **Monitoring and review:**

CiC monitors our workforce and network on the grounds of age, ethnicity and gender to ensure we have a proper representation of the population at large. We do not at present collect details of religion or sexual orientation as this information is regarded as personal.

This Equality & Diversity Policy will be subject to a regular annual review. Amendments will be carried out when appropriate to ensure that this remains a living, up to date and relevant policy.

### **Disciplinary Procedures:**

CiC encourages mindfulness of this policy and its objectives in all dealings between the company and its staff, associates, customers and the general public. All staff and associates must comply with the terms of this policy and any failure to do so will be a disciplinary matter subject to action under the Complaints or Grievance procedures as appropriate.

All actions taken under the disciplinary procedures will conform to the requirements and intentions of this policy.

## Appendix A

### The Equality Act 2012, Section 149.

#### The General Equality Duty

The general equality duty is set out in the Equality Act 2010 (the Act). In summary, those subject to the equality duty must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

These are sometimes referred to as the three aims or arms of the general equality duty.

The Act helpfully explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities.

It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups.

It states that compliance with the duty may involve treating some people more favourably than others.

Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic but that the others arms (advancing equality and fostering good relations) do not apply.

## Appendix B

### Glossary of terms

**Disability:** A disabled person is described in the Equality Act 2010 as one who has a physical or mental impairment which has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.

**Diversity:** Diversity is about recognising, valuing and taking account of people's different backgrounds, knowledge, skills, and experiences, and encouraging and using those differences to create a productive and effective workforce.

**Ethnicity:** A strict definition of an ethnic group is a group regarded as a distinct community by virtue of certain essential characteristics – a shared history which distinguishes it from other groups and a cultural tradition of its own. Sikhs and Gypsies are examples. However, it has come to have a broader meaning and the expression 'ethnic monitoring' is used in reference to groups defined by colour, race or national origin as well.

**Gender:** The word 'gender' is often used in place of the word 'sex' inequality issues. 'Gender' does not appear in legislation (except for 'gender re-assignment' – see below) but 'sex discrimination' and 'gender discrimination' are generally interchangeable.

**Gender Reassignment:** Gender reassignment is a personal, social, and sometimes medical, process by which a person's gender presentation (the way they appear to others) is changed.

Not all trans people undergo medical supervision to change their gender. People who decide to live in the gender opposite to that assigned at birth, but do not undergo any medical procedures, are protected from discrimination under the Equality Act 2010.

**Harassment:** Behaviour which is unwelcome or unacceptable and which results in the creation of a stressful or intimidating environment for the victim amounts to harassment. It can consist of verbal abuse, racist jokes, insensitive comments, leering, physical contact, unwanted sexual advances, ridicule or isolation.

**Protected characteristics:** A protected characteristic is a group which is protected from discrimination under equality legislation. The Equality Act 2010 covers nine protected characteristics:

- age
- disability
- gender
- gender reassignment;
- marriage and civil partnership
- pregnancy and maternity
- race/ethnicity
- religion or belief
- sexual orientation

**Sexual orientation:** Whether a person is attracted to people of their own sex, the opposite sex or both sexes. Assumptions and perceptions of a person's sexual orientation are also covered by law.

**Trans:** Trans is an umbrella term for people whose gender identity and/or gender expression differs from what is typically associated with the sex they were assigned at birth. People under the transgender umbrella may describe themselves using one or more of a wide variety of terms – including transgender or trans.

**Victimisation:** If a person has made or is making an accusation of discrimination in good faith, it is unlawful to discriminate against them for having done so, or because they intend to do so or it is suspected that they intend to do so.

**Approved by:**



**CEO**

**Date: 12.4.2016**

## Appendix C

### Examples of Reasonable Adjustments

#### Working arrangements:

- allowing a phased return to work;
- changing individual's working hours;
- providing help with transport to and from work;
- arranging home working, providing a safe environment can be maintained;
- allowing an employee to be absent from work for rehabilitation treatment.

#### Premises:

- moving tasks to more accessible areas;
- making alterations to premises.

#### Adjustments to a job:

- providing new or modifying existing equipment and tools;
- modifying work furniture;
- providing additional training;
- modifying instructions or reference manuals;
- modifying work patterns and management systems;
- arranging telephone conferences to reduce travel;
- providing a buddy or mentor;
- providing supervision;
- reallocating work within the employee's team;
- providing alternative work.