



St Wilfrid's Hospice

Equality, Diversity and Inclusion Policy

1. Key points about this policy

- Valuing and working constructively with diversity to enable fair and full participation in our work and activities.
- Ensuring that there is no unjustified discrimination in our recruitment, selection, performance management and other processes.
- Assessing the impact of our policies to ensure that they don't disadvantage particular groups.
- Ensuring our values – Compassionate, Professional, Progressive and Respectful – underpin how we respond to equality, diversity and inclusion at St Wilfrid's.
- Treating each other with fairness, dignity and respect.
- Playing our part in removing barriers and redressing imbalances.

2. Does this policy have any impact on equality and inclusion?

There is no assessed impact, please see Appendix One.

In more detail

3. What is this policy about?

St Wilfrid's Hospice is committed to equality of opportunity and to providing a supportive and inclusive culture, one in which all our people are recognised as the individuals they are and treated with dignity and respect at all times. We value everyone's contribution and will endeavour to ensure that people are given the opportunity to realise their potential.

We are committed to upholding the Human Rights Act 1998 and the Equality Act 2010, the extension of the law on harassment and the Equality and Human Rights Commission's Codes of Practice for Employment, Equal Pay and Services, Public Functions and Associations.

The hospice, in providing its services has zero-tolerance of discrimination of patients, family members, visitors or members of the public.

By working together to promote an inclusive workplace and workforce we will signal not just our commitment to diversity and inclusion but to providing the best possible care across all our community.

4. Definitions:

Where the term “employee” is used in this document it includes volunteers and contractors with practising privileges (see Practising Privileges Policy for definition).

Where the term “discrimination” is used it refers to the unjust or prejudicial treatment of different categories of people, especially on the grounds of one or more of the nine protected characteristics. These are age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex and sexual orientation.

Where the term “students” is used it refers to those who are studying at a university or other place of higher education and doing a placement at St Wilfrid’s and/or volunteering to gain academic credits.

“Trainees” refers to people undergoing training at St Wilfrid’s Hospice.

5. What are the different responsibilities under this policy?

The **Chief Executive**, under delegated authority from the Board of Trustees, holds ultimate accountability for adherence to the policy, ensuring that reasonable resources are made available for its implementation.

The **Associate Director for People** is responsible for ensuring this document is compliant with statutory legislation and implemented into practice.

Managers are responsible for informing and educating all existing employees, volunteers and contractors with practising privileges about the requirements of the document and dealing with any immediate concerns.

All **employees, volunteers and contractors with practising privileges** are responsible for adherence to the policy.

6. Putting the policy into practice:

6.1 Approach

St Wilfrid’s Hospice commits to:

- Foster a supportive and inclusive environment in which individual differences and the contributions of all team members are recognised and valued.
- Provide a working environment that promotes dignity and respect for everyone, where people are free from discrimination, intimidation, harassment or bullying.
- Enable our people to achieve their full potential. Selection for training, development and progression opportunities will be purely based on merit and organisational priorities.
- Encourage anyone who feels they have been subject to discrimination to raise their concerns so we can take action.
- Review regularly our employment practices and procedures so that fairness is maintained.
- Take all cases of discrimination seriously and deal with them promptly.

All our processes will be fair and non-discriminatory this includes ensuring that all aspects of our recruitment and selection processes are fair and do not provide those in our employment less favourable facilities or treatment.

Employees, no matter whether they are part-time, full-time, or temporary, will be treated fairly and with respect. They will be given help and encouragement to develop to their full potential and utilise their unique talents. When selecting candidates for employment, promotion, training, or any other benefit, it will be on the basis of their aptitude and ability.

As an employer and service provider, St Wilfrid's is required to comply with antidiscrimination legislation. It is also firmly within our ethos and values as an organisation to ensure fairness, dignity and respect. We have a zero-tolerance approach to discrimination and harassment and all allegations will be investigated and dealt with promptly (see Dignity and Respect and Disciplinary Policy and Procedure for the complaints procedure).

6.2 Responsibilities

Our commitment includes training managers and all other employees about their rights and responsibilities in respect of equality, diversity and inclusion. All employees are responsible for the promotion and advancement of equality, diversity and inclusion at St Wilfrid's. Behaviour, actions or words that undermine this are not acceptable and will be addressed in line with hospice policy and our values.

Responsibilities include employees conducting themselves in such a way as to help the hospice provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All employees should understand that they, as well as the hospice, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination in the course of their employment, against fellow employees, patients, visitors, volunteers, and the public.

The hospice will take very seriously any complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, patients, volunteers, family members, visitors, the public and any others in the course of the hospice's work activities.

Such acts, following investigation, could be dealt with as misconduct under the hospice's grievance and/or disciplinary procedures and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

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.

The hospice will assess any new programme, policy or strategy to see if it will meet the general equality duty and take any necessary actions (see Equality Impact Assessment Guidance).

7. Related hospice policies and procedures:

Code of Conduct and Disciplinary Rules
Data Security and Protection Policy
Dignity and Respect at Work Policy
Disciplinary Policy and Procedure
Grievance Policy and Procedure
Internal Communications Policy and Procedure
Our Core Values
Performance Development Policy
Practising Privileges Policy and Procedure
Whistleblowing Policy and Procedure

8. Training needs:

Employees will be made aware of the policy as part of their induction process.

If any changes are made to the policy employees will be notified. One-to-one briefings will be given where specific guidance or assistance is required by the individual.

9. Policy review:

The policy will be reviewed following introduction of any new legislation, significant changes within the organisation or 3 years following implementation of this document.

10. Compliance with statutory and other requirements:

Care Quality Commission (CQC) – Essential Standards of Quality and Safety
Equality Act 2010
Employment Rights Act 1996

11. Monitoring

Monitoring will include assessing how this policy is working in practice utilising various means, which could include employee pulse survey questions, recruitment feedback, exit interviews, performance reviews etc.

St Wilfrid's will monitor the make-up of the workforce including 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 this policy.

12. References:

Data Protection Act 2018

General Data Protection Regulation (2018)

Equality Act 2010

The Human Rights Act 1998

The extension of the law on harassment

Equality and Human Rights Commission's Codes of Practice for Employment, Equal Pay and Services, Public Functions and Associations.

13. Version control table:

Document Owner:	Associate Director for People		
Approved By:	People Committee	Date Last Approved:	December 2022
Date of Next Review:	1/12/2025		

Record of Changes		
Date	Version	Changes/Comments
01.06.2016	2	
01.06.2019	3	
01.12.2022	4	

Appendix One - Equality Impact Assessment Tool

The hospice aims to design and implement services, policies and measures that meet the diverse needs of their service, population and workforce, ensuring that none are placed at a disadvantage in relation to others. The Equality Impact Assessment Tool is designed to help staff consider the needs and assess the impact of the policy in this light. Appropriate adjustments should be made to address any barriers to equity of access. This must be completed using the Equality Impact Assessment Guidance.



Policy and Procedure Title: Equality, Diversity and Inclusion Date Completed: February 2023

Assessment tool completed by: Name Nyasha Maposa Job Title: EDI Lead

Peer reviewed by: Name: Georgina Chandler Job Title: Associate Director for People

		Yes/ No	Please elaborate on your answer
1.	Does the document/policy affect one group less or more favourably than another on the basis of:		
	Race (including ethnicity and nationality) Does the document/policy take into account the needs of people from different groups, if not do you need to make any adjustments?	No	
	Gender (including gender reassignment) Is the language in the document/policy inclusive of trans and non-binary people?	No	
	Culture	No	
	Religion or belief Do people from faith groups experience any specific disadvantage in relation to your document/policy?	No	
	Sexual orientation	No	

	Is your language inclusive of LGBTQ+ groups?		
	Age Are there ways older or younger people may find it difficult to engage with your document/policy?	No	
	Disability Learning disabilities, physical disability, sensory impairment and mental health problems, do you need to consider large print or easy read for the document/policy?	No	
2.	Is there any evidence that some groups will be affected differently by the document/policy?	No	
3.	If you have identified potential discrimination, are there any exceptions valid, legal and/or justifiable?		
4.	Is the impact of the document/policy likely to be negative?	No	
5.	If so, can the impact be avoided?		
6.	What alternative is there to achieving the aims of the document/policy without the impact?		
7.	Can we reduce the impact by taking different action?		

If you have identified a potential discriminatory impact of this document/policy, please [fill out this out](#) with any suggestions as to the action required to avoid/reduce this impact and refer to the Associate Director of People.

Checked and signed off by Name: Georgina Chandler Date: 1/3/23

Appendix Two

Equality Impact Assessment Template and Guidance

Before carrying out an Equality Impact Assessment (EIA), you should familiarise yourself with the guidance notes (see Appendix).

An EIA should be carried out whenever you are starting (and regularly reviewing) any major activity (e.g. a new strategy, programme, or campaign).

A. Name and the nature of the programme/ activity
C. Person responsible for the programme/ activity
Name: Job title: Department:
D. Equality and Diversity considerations
Describe the ways in which the groups below may be impacted by your activity. The impact may be negative or positive. There are some example questions below to aid your thinking
If you are unsure about how to find out about the needs of the groups noted below, you may wish to speak to the Hospice Equality, Diversity & Inclusion Lead (Nyasha.maposa@stwhospice.org) who can provide information and/or access to the appropriate organisations and/or diverse people with lived experience.
<ol style="list-style-type: none">1. Age (e.g., are there ways older or younger people may find it difficult to engage in your project or process?)2. Disability (do you need to consider large print or easy read of any surveys /questionnaires?)3. Race (including ethnicity and nationality) (does your project take into account the needs of people from different groups, if not do you need to make any adjustments?)4. Religion or belief (do people from faith groups experience any specific disadvantage in relation to your research project)5. Sex6. Gender7. Sexual orientation (is your language inclusive of LGBTQ+ groups?)

8. Trans and non-binary – is your language inclusive of trans and non-binary people?
9. People experiencing multiple needs such as homelessness, mental health problems, being involved in the criminal justice system or substance misuse.
10. Social deprivation- e.g. people who may be prohibited from attending your event/programme due to the cost of travel
11. Pregnancy and maternity

E. Evidencing Impact

Please answer each of the following questions:

1. **Is there any information available about the people who will be involved in or affected by your programme/ activity? (E.g. demographic info, scoping of need etc)**
2. **Are there any gaps in evidence/ insufficient information to properly assess the impact of your programme/ activity, and how will this be addressed? E.g. further research or working with a voluntary sector organisation?**
3. **Does your programme/ activity disproportionately affect any one group named above?**
4. **Will this programme/ activity lead to discrimination (direct or indirect), harassment, victimisation, or less favourable treatment of people with protected characteristics?**
5. **Does your programme/ activity contribute to advancing equality of opportunity?**
6. **Is there an opportunity for your programme/ activity to foster good relations between groups?**
7. **Do you need to make any reasonable adjustments to your programme/ activity to avoid discrimination or advance equality of opportunity? This may include adjusting interview questions so they are more accessible or making changes to the way events/programmes are managed.**
8. **How is the programme/ activity's communication made accessible to all groups?**
9. **How are you engaging people with a wide range of protected characteristics in the development, review and/or monitoring of the programme/ activity?**

F. EIA Outcome

Select one of the four options below to indicate how the development or review of the programme/ activity will be progressed and state the rationale for the decision. (Delete the options that do not apply):

Option 1: No change required – the assessment is that the programme/ activity is/will be robust.

Option 2: Adjust the programme/ activity – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.

Option 3: Continue the programme/ activity despite the potential for adverse impact with mitigation in place

Option 4: Stop the programme/ activity as there are adverse effects which cannot be prevented/mitigated.

H. Sign-off

EIA undertaken by (name and job title):

Date:

Appendix: Equality Impact Assessment Guidance

Introduction

This guidance is intended to help you undertake an Equality Impact Assessment (EIA).

An EIA should be carried out whenever you are starting (and regularly reviewing) any major activity (e.g. a new strategy, programme, or campaign). For the purposes of this template, this is summarised as your 'programme/ activity'.

EIA is part of the Hospice's general equality duty under the Equality Act 2010. The Equality Act 2010 specifies the following 'protected characteristics': age, disability, race (including ethnicity and nationality), religion or belief, sex, sexual orientation, gender reassignment, pregnancy and maternity, and marriage or civil partnership.

The Hospice has a general equality duty to have due regard to the needs to:

1. eliminate discrimination, harassment and victimisation
2. advance equality of opportunity
3. foster good relations between people who share a relevant protected characteristic and people who do not share it.

This guidance is designed to lead you through the EIA process through asking pertinent questions and giving examples. The law does not dictate a particular form for EIA, but we have provided a template for you use if required. The requirement is to actively consider how a programme/ activity will meet the general equality duty and take any necessary action. Wherever practicable, EIA should be built into standard processes and tailored to the nature of the policies or practices involved.

Answers should be recorded in the EIA form and can be expanded and supplemented as required. Answers may be as long or short as is necessary and relevant, bearing in mind that the effort involved in EIA should be proportionate to the relevance of the programme/ activity to equality.

Assessing for Equality Impact

Before assessing the programme/ activity, ensure that you have a clear understanding of the purpose of the programme/ activity, the context, the intended beneficiaries, and the results aimed for.

4. Bear in mind that the extent of EIA should be proportionate to the relevance of the programme/ activity to equality. It may not be practicable or necessary to answer every question or address every potential scenario.
5. Focus mainly on aspects of the programme/ activity that are most relevant to the question, to ensure most attention is given to the most important areas.
6. Relate answers to consideration of the available evidence and address any gaps or disparities revealed, where feasible without disproportionate effort. For new policies, assess potential impact.
7. Describe any action identified to address any issues highlighted.

8. Where there is potential for adverse impact, but the programme/ activity will still be applied, indicate the rationale for that decision.

Initial/partial EIA: in some circumstances - particularly for new policies/practices – there may be limited information on which to base EIA. In these cases, the EIA should be carried out to the extent possible and should identify arrangements for monitoring/ investigation of equality impact and for fuller EIA in future.

Wholly positive impact: Some policies/practices may be viewed as having only positive equality impact. For these, consideration should still be given to ensure that no adverse impact is overlooked and to ensure that full advantage is taken of the positive impact, e.g. through effective communication. However, the effort involved in carrying out EIA should not be excessive.

Undertaking an Equality Impact Assessment

Sections A, B, and C

Indicate the current status of the programme/ activity or the stage of development/review. Also note any general comments here regarding the relevance and significance of the programme/ activity to equality. Which aspects of the programme/ activity are particularly relevant (which should be the main focus for EIA)? On what aspects of equality does the programme/ activity particularly impact?

Section D

Indicate which equality group/s is the programme/ activity relevant and why? Policies/practices applying to substantial groups of service users or staff will be relevant to all equality groups, which should be noted.

The protected characteristics under the Equality Act are:

9. Age
10. Disability
11. race (including ethnicity and nationality)
12. religion or belief
13. sex
14. sexual orientation
15. gender reassignment
16. pregnancy and maternity
17. marriage or civil partnership *1

You must consider each of these protected characteristics. As part of this, consider diversity within, as well as between groups (e.g. different disabilities, different racial groups). Consider

1 Note: only the duty to eliminate discrimination applies to marriage and civil partnership. There is no need to have regard to advancing equality or opportunity or fostering good relations in this respect.

the implications of combinations of protected characteristics e.g. issues of relevance to women may vary once race, religion and age are taken into consideration. Also consider the impact on those with caring/family responsibilities (which tends to impact more on women).

Section E

1. What evidence is available about the needs of relevant equality groups? E.g. information/feedback from equality groups or other stakeholders, involvement or research with equality groups or individuals, equality monitoring data, service monitoring data, information for other similar policies/practices, staff surveys, research reports, demographic information, audit, inspection or management reports and recommendations.
2. Where are the gaps in evidence? If there is insufficient information to properly assess the programme/ activity, how will this be addressed? If information cannot be gathered now, consider building monitoring into the plans for implementation/review of the programme/ activity. Note: the resources put into collecting evidence should be proportionate to the relevance of the programme/ activity to equality.
3. Is there evidence (or an expectation) of higher or lower uptake by any equality group(s)? If so, give details of the differences and the reasons for these (if known)? Is any equality group excluded from participating in or accessing the service or functions? If so, why? Does the programme/ activity create any barriers for any group? For example, because of the time when the service is delivered or because of restricted income?
4. Might the application of this programme/ activity lead to discrimination, harassment or victimisation? Might it result in less favourable treatment for particular equality groups or give rise to indirect discrimination?
5. Does the programme/ activity contribute to advancing equality of opportunity? *2 Will it help to:
 1. remove or minimise disadvantage?
 2. meet the needs of different equality groups?
 3. encourage increased participation of particular groups?
 4. take account of disabled people's impairments?
6. Is there an opportunity in applying this programme/ activity to foster good relations between people in any protected group and those who are not? *3 Will it help to tackle prejudice and/or promote understanding?

2 This question does not apply to the protected characteristic of marriage or civil partnership

3 This question does not apply to the protected characteristic of marriage or civil partnership

7. Are reasonable adjustments built in where they may be needed? Is there evidence (or an expectation) that people from different equality groups have different needs or experiences in relation to the programme/ activity? If so, what are they?
8. Is the communication of the programme/ activity accessible to all groups? Are you using channels that are accessible to everybody? How could you make sure that your messages reach the widest range of people?
9. How are relevant equality groups or communities involved in the development, review, and/or monitoring of the programme/ activity?

Section F

There is a legal obligation to take account of the results of the EqIA in the development of a new or revised programme/ activity. This requires considering taking action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and exploiting any potential for positive impact. Clearly any unlawful discrimination must be eliminated.

Having considered all of the sections of the EqIA form you must come to a conclusion about how the development/review of the programme/ activity should be progressed. The reasons for the outcome and option chosen should be noted:

1. **Option 1:** No change required – the assessment is that the programme/ activity is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review.
2. **Option 2:** Adjust the programme/ activity – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations. This may involve removing or changing the aspect of the programme/ activity that creates any negative or unwanted impact. It may also involve introducing additional measures to reduce or mitigate any potential negative impact.
3. **Option 3:** Continue the programme/ activity – this means adopting/continuing with the programme/ activity despite the potential for adverse impact. Set out the rationale for this decision, including how the decision is compatible with our legal obligation. Where there is discrimination, but it is considered not to be unlawful – the objective justification must be recorded.
4. **Option 4:** Stop the programme/ activity – if there would otherwise be unlawful discrimination or adverse effects that are not justified and cannot be prevented/mitigated.

Section G, H, and I

5. Specify the actions required to implement the findings of this EIA.

6. State how the programme/ activity will be monitored in relation to its equality impact (or note where this is specified above).
7. When will the programme/ activity next be reviewed?

