

Equality & Inclusion Policy

Our Commitment

A New Direction is committed to creating an inclusive working culture, where everyone who works for or with us is treated with dignity and respect.

Our ambition is for A New Direction to be the most inclusive organisation we can be with:

- a workforce and Board that reflects the community we serve.
- a working culture where everyone feels included and able to be their whole selves at work.
- programming that's accessible and welcoming to all.

We are committed to providing equal opportunities in employment and to actively avoiding unlawful discrimination, for everyone who works for or with A New Direction and all those we encounter in the course of our work.

This means that, recognising protected characteristics as outlined under the Equality Act 2010, we will not discriminate directly or indirectly by association or perception on grounds of race, religion and belief, sex, sexual orientation, gender reassignment, marriage or civil partnership, pregnancy and maternity, age, ability and class/socio-economic status or background.

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I. What is the purpose of this policy?

I.1. This policy outlines:

- our commitments to equality and inclusion.
- our expectations and the responsibilities of A New Direction, our team and the people we work with.
- our duties as an employer relating to protected characteristics under current legislation and how we will ensure we meet these.

1.2. The policy is a roadmap for how we will uphold/embed our [Vision, Mission](#) and [Values](#) into the organisational culture and working practices.

2. Scope – What does this Policy cover?

- 2.1. **Who?** Everyone who works for or with A New Direction is expected to read and comply with this policy. This includes all employees, freelancers, volunteers, trainees and board members. Equity is one of our core values and this should influence how we work together and everything we do.
- 2.2. Ensuring that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. A New Direction has a separate **Dignity at Work Policy**, which deals with these issues.
- 2.3. This is a non-contractual policy which will be reviewed and adjusted as required.

3. What does Equality and Inclusion look like at A New Direction?

- 3.1. **Equality** is about fair treatment of everyone, recognising the needs of individuals wherever we can and treating everyone with respect.
- 3.2. **Diversity** is about recognising, valuing and celebrating people's different backgrounds, knowledge, skills and experiences.
- 3.3. **Inclusion** is the culture in which a diverse range of people can come to work or work with us and feel comfortable, valued, and able to be their whole selves.
- 3.4. One of our core values is **equity**. We believe all children and young people, regardless of wealth, geography or luck should have the opportunity to take part in culture and develop their creativity. We will always work to support those individuals and communities who are experiencing barriers and challenges.
- 3.5. At A New Direction this means we aim to celebrate, challenge and empower people and our work to be fair, inclusive, equitable and accessible. Whilst diversity is a strong foundation, it's not the end goal in itself. We actively strive

to embody our values and live our commitment to equality and inclusion through all of our work daily.

4. What are my responsibilities?

- 4.1. Every employee is required to be actively engaged in supporting A New Direction to meet its commitment to equality and inclusion. We expect every employee to play their part in promoting a culture of equality of opportunity for all and be a positive force for change.
 - Compliance with this policy will ensure that employees do not commit unlawful acts of discrimination. You can be held personally liable as well as, or instead of, A New Direction for any act of unlawful discrimination. Discrimination, harassment, bullying or victimisation of any kind are disciplinary offences and will be dealt with under A New Direction's **Disciplinary Policy**. (See appendix A for types of unlawful discrimination)
- 4.2. Anyone who works with us in a voluntary or paid basis shall be given an induction into our Equality and Inclusion policies and practices.
- 4.3. Our Trustees are expected to play their part in promoting and monitoring a culture of equality of opportunity within A New Direction. Training will be given to support understanding of and compliance with our policies, and to enable trustees to hold A New Direction's executive team accountable to the implementation of this policy. Trustees will seek assurance from the executive team that appropriate processes are deployed to deliver an inclusive culture and equality of opportunity.

5. How will A New Direction enact this policy?

- 5.1. Our **Equality and Inclusion Plan**, is the structure by which we will be able to fulfil the commitments and duties outlined in this policy. The E&I Plan sets out specific actions for staff, management and trustees to ensure progress is made and the policy upheld.

6. How will A New Direction ensure equal opportunities across our work?

- 6.1. Equal opportunity means that everyone is treated with respect and without discrimination, particularly on the grounds of protected characteristics. The Equality Act 2010 protects you from discrimination at work.
- 6.2. We are committed to providing equal opportunities in employment and to avoiding unlawful discrimination, for everyone who works for or with A New Direction and all those we encounter in the course of our work.

6.3. Employment

A New Direction will actively avoid unlawful discrimination in all aspects of employment including: recruitment, progression, performance management, any Equality and Inclusion Policy

opportunities for training or personal development, pay and benefits, facilities, discipline, retirement, dismissal, redeployment and selection for redundancy.

6.4. Recruitment

Person and job specifications will be relevant to those requirements that are necessary for effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability.

6.5. Standard Working Practices

A New Direction will consider any possible indirectly discriminating effect of its standard working practices. This includes, but is not limited to, number of hours to be worked, the times at which work is to be done and the place at which work is to be done.

6.6. Reasonable Adjustments

A New Direction will also make any reasonable adjustments to its standard working practices to overcome barriers caused by disability. The overall aim will be, as far as possible, to remove or reduce any substantial disadvantage faced by a staff member or job applicant which would not be faced by a non-disabled person. (See appendix 2)

6.7. Communications

We will ensure that all our communications are as inclusive and accessible as it can be.

6.8. Partners & Stakeholders

We are aware that we are working to influence other organisations, stand-up for young Londoners and shift culture in education and the creative and cultural industries – to do this well we need to make sure we are modelling the behaviour we expect of others and embedding strong principles into our work.

A New Direction will not discriminate unlawfully against any of those using or seeking to use our goods, facilities and services.

6.9. Freelancers, Contractors and Suppliers

A New Direction will ensure a fair process, actively avoiding unlawful discrimination for the issuing of freelance and supplier contracts, in line with our Procurement Procedure.

6.10. Programmes & Events

We will ensure all our programmes are as inclusive as they can be and ensure equitable and fair access to all who attend our events. Recruitment for participants on programmes will be consistent with our wider recruitment practices.

6.11. Training

A New Direction will provide additional support to all those likely to be involved in recruitment or other decision-making where equal opportunities issues are likely to arise. This will enable us to both realise our commitments and to adhere to the law.

7. Equal Opportunities Monitoring

- 7.1. A New Direction will monitor the ethnicity, gender, sexuality, disability, age and socioeconomic composition of our workforce and of applicants for jobs (including promotion), encouraging candidates and colleagues to share data so that the monitoring process can be as accurate and comprehensive as possible. A New Direction will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.
- 7.2. Participation, access and engagement in our programmes of work will be monitored and relevant data collected and reported to the Executive Team and also to the Board.
- 7.3. Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 2018.

8. How will A New Direction use Positive Action to ensure diversity across the workforce?

- 8.1. A New Direction aims to have a workforce and Board that reflects the community we serve and programming that's accessible and welcoming to all.
- 8.2. We are committed to using Positive Action, as permitted by the Equality Act 2010, to take steps to improve equality and representation in our workplace.

8.3. Positive Action is:

- Taking specific steps to improve equality in our workplace.
 - Meeting a group's particular needs, lessening a disadvantage that they might experience or help to increase their participation in a particular activity
 - Permitted by the Equality Act 2010
 - Action can only be taken where it is reasonably thought that participation in an activity by people sharing a particular protected characteristic is 'disproportionately low'. Evidence or an indication of this is required.
 - Positive Action must be an appropriate way to achieve one of the aims and the steps taken must be carefully thought through.
 - It is not open ended, action may continue until it has remedied the situation; and reviews should take place.
 - It is illegal to discriminate (i.e. Positive Discrimination), except for Reasonable Adjustments provided to people with disabilities or where there is a Genuine Occupational Requirement.
- 8.4. A New Direction is developing a Positive Action Plan, based on evidence of our workforce and participation in our programmes. This will be incorporated into our Equality and Inclusion Plan.

9. How will we hold ourselves accountable?

- 9.1. We know that we are not perfect and, in common with most organisations, we have a journey to travel to achieve our ambition for inclusivity.
- 9.2. This policy will be reviewed alongside our Equality and Inclusion plan on an annual basis. This policy will be monitored and updated in accordance with changes in the law.
- 9.3. The LOVE (Living Our Values Everyday) group will meet regularly to track progress, discuss plans and policy and respond to emergent matters arising. It is representative of all teams and levels of the organisation.
- 9.4. We will also monitor data collected through our equal opportunities monitoring to track progress and identify areas of improvement.

10. What to do if you feel you are being treated unfairly?

- 10.1. If you consider that you have been unlawfully discriminated against, you may use **A New Direction's Grievance Procedure** to make a complaint. If your complaint involves bullying or harassment, the grievance procedure is modified, as set out in the **Dignity at Work policy**.
- 10.2. We will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your grievance is both untrue and made in bad faith.

11. External Links and Resources

- [ACAS Helpline](#)
- [Health Assured](#) (A New Direction's Employee Assistance Programme)

APPENDICES

A. Useful definitions

What is discrimination?

By law, being 'discriminated against' is when you're treated unfairly because of your protected characteristics. Discrimination based on your protected characteristics is usually against the law.

Direct discrimination is when someone is treated unfairly because of a protected characteristic, such as sex or race. It is also direct discrimination to be treated unfairly because of the protected characteristic of either someone you know or someone you are associated with.

Indirect discrimination can happen when there are rules or arrangements that apply to a group of employees or job applicants, but in practice are less fair to a certain protected characteristic.

Harassment is unwanted conduct, related to one of the protected characteristics that has the purpose or effect of violating a person's dignity or creating an degrading, or offensive environment.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic

Third-party harassment occurs when an employee is harassed and the harassment is related to a protected characteristic by third parties. The organisation must be aware that the harassment has taken place, and it must have failed to take reasonable steps to prevent the harassment from happening again.

Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity, or a promotion because they made, or supported, a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so.

B. The legal framework

It is unlawful to discriminate directly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality, and ethnic or national origins), sexual orientation, religion or belief, because someone is married or in a civil partnership, and for reasons of pregnancy or maternity. These are known as 'protected characteristics'.

Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.

Staff should not discriminate against or harass a member of public in the provision of services and goods.

It is unlawful to fail to make reasonable adjustments to overcome barriers using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, there is an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

C. Reasonable Adjustments

2.1 Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

2.2 A 'reasonable adjustment' is a change to remove or reduce the effect of:

- an employee's disability so they can do their job
- a job applicant's disability when applying for a job

What is reasonable will depend on the circumstances of each case, but adjustments could be to:

- the workplace (making changes to overcome barriers created by the physical workplace)
- the ways things are done (where the disabled job worker is put at a substantial disadvantage by a provision, criterion or practice).
- Providing extra equipment or getting someone to assist the employee or job applicant

2.3 When deciding whether an adjustment is reasonable we will consider:

- how effective the change will be in avoiding the disadvantage the employee would otherwise experience
- its practicality
- the cost
- our resources and size
- the availability of financial support.

The overall aim will be, as far as possible, to remove or reduce any substantial disadvantage faced by a staff member or job applicant which would not be faced by a non-disabled person.