

THE WHEELS PROJECT

31 - 32 Bonville Road

Brislington

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Registered Charity No: 1081236

EQUALITY AND DIVERSITY POLICY

Our commitment and vision

The Wheels Project Ltd is an equal opportunities organisation. This means we take the Equality Act 2010 and our responsibility to uphold every aspect of the Act seriously. We also recognise that where we have links with the Public Sector, we strive to ensure we contribute to their duty to:

- Eliminate discrimination, harassment, victimisation, and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and those who do not
- Foster good relations between people who share relevant protected characteristics and those who do not

We are committed to ensuring equality of opportunity and fairness in all areas of the Project. It is the Policy of the Management Committee to ensure that no applicant, employee, service user, trustee, partner, associate, volunteer, community member coming into contact with the Project receives less favourable treatment on the grounds of protected characteristics. By **protected characteristics** we mean all that are contained within the Equality Act 2010: disablement, sex, sexual orientation, marital status, race, religion, belief, colour or nationality, pregnancy or maternity or is disadvantaged by conditions or requirements which cannot be shown to be justifiable.

Our commitment lies at the heart of our promise to provide outstanding customer service and maintain the highest standards of professional excellence. We are committed to recruiting, training, and promoting the best person for the job and encouraging all our colleagues to reach their full potential.

We are determined to create a working environment which supports our Vision and Values, and which is free from any form of discrimination, harassment or bullying and within which all individuals are treated with respect, fairness, and courtesy. We understand there to be seven kinds of discrimination held in the Equality Act 2010 which we recognise:

- Direct discrimination: discrimination because of a protected characteristic
- Associative discrimination: direct discrimination against someone because they are associated with another person with a protected characteristic. (This includes carers of disabled people and elderly relatives, who can claim they were treated unfairly because of duties they had to carry out at home relating to their care work. It also

covers discrimination against someone because, for example, their partner is from another country)

- Indirect discrimination: when you have a rule or policy that applies to everyone but disadvantages a person with a protected characteristic
- Harassment: unjustified, unreasonable, or inappropriate treatment of, or behaviour deemed offensive by the recipient. Employees can claim they find something offensive even when it's not directed at them. The following types of behaviour may amount to harassment:
 - Physical assault
 - Physical or verbal abuse including threats
 - Suggestive comments or gestures
 - Suggestive or offensive emails
 - Insulting or abusive behaviour or comments
 - Isolation or exclusion from work opportunities, corporate, social, or sporting events
 - Persistent criticism or humiliation
 - Unfair allocation of work or responsibilities.

The following types of behaviour may amount to sexual harassment:

- Physical conduct of a sexual nature
- Unwanted physical contact or conduct even if not obviously sexual including unnecessary touching, brushing against another individual, uncomfortable proximity
- Verbal conduct of a sexual nature including unwelcome sexual advances, continued suggestions of social activity outside work after it has been made clear that this is unwelcome, suggestions that sexual favour may further a career (or refusal may hinder it)
- Behaviour or treatment which an individual faces because they will not submit to invitations of a sexual nature or unwelcome advances, including social invitations e.g., a date
- Insults, ridicule or teasing of a sexual nature, insults related to gender or sexual orientation, offensive comments about appearance or dress, talk or jokes of a sexual nature which a person present has indicated they dislike
- Display of sexually suggestive or pornographic pictures, or sending such items electronically sending sexually harassing messages or images through email

The following types of behaviour may amount to homophobic bullying and harassment:

- making homophobic insults and threats
 - making unnecessary and degrading references to an individual's sexual orientation
 - engaging in banter or making jokes which are degrading to a person's sexual orientation or perceived sexual orientation
 - outing an individual as lesbian, gay or bisexual (LGB) without their permission
 - ignoring or excluding a colleague from activities because they are LGB
 - spreading rumours or gossip about an individual's sexual orientation
 - asking an LGB colleague intrusive questions about their private life
 - making assumptions and judgements about a colleague based on their sexual orientation
 - using religious belief to justify anti-gay bullying and harassment.
- Harassment by a third party: employers are potentially liable for the harassment of staff or customers by people they don't directly employ, such as a contractor.

- Victimisation: discrimination against someone because they made or supported a complaint under Equality Act legislation.
- Discrimination by perception: direct discrimination against someone because others think they have a protected characteristic (even if they don't).

Any behaviour involving discrimination, victimisation, or harassment of another on the grounds of protected characteristics will not be tolerated. Such behaviour may amount to gross misconduct in which case disciplinary action (including dismissal for serious offences by staff) will be taken against any person breaching this policy.

Shared responsibility

Leadership

- We will support and encourage our Board members, colleagues, and partners in their responsibility to implement this policy by facilitating training sessions, actively reviewing the Policy in the light of changes in legislation and annually in accordance with our Quality management system.
- We will ensure our service users and service providers are fully aware of this Policy and uphold its principles and practise in fulfilment of their obligations to the Project and its stakeholders.
- We will take positive action to ensure the Policy is a live document which is based on good practice and up to date legislation. This means we will review all aspects of our service delivery and our relationships with all other stakeholders to ensure representativeness and awareness of individual need. It also means that we will use information we collect on service users and stakeholders to ensure there are additional services and support available such as interpretation, large print, and other methods to ensure services are delivered appropriate to need.

Staff and volunteer responsibility

- Staff members and volunteers are required to comply with the policy in all their dealings with clients, colleagues, and anyone else with whom they come into contact during the course of their involvement with The Wheels Project. The policy and principles underlining our commitment applies when they are working on our premises or at those of any client or contact.
- It is everyone's responsibility to ensure the policy is implemented. Any breach of this policy will be treated as a breach of trust and contract with The Wheels Project Ltd and therefore may result in further action.

Scope of the Policy

This policy applies to everyone working at The Wheels Project Ltd including employees, trustees, partners, temporary or agency workers, volunteers, trainees, work experience students, secondees, contractors and associates. It affects how we work with our clients and our suppliers of goods and services

This policy covers the following matters:

- Recruitment and Selection
- Terms and conditions of employment/terms of engagement
- Disability and impairment

- Training, Learning and Development
- Promotion
- Procurement
- Grievance and Complaints procedures
- Positive Action
- Monitoring

Recruitment and Selection

The Wheels Project Ltd will ensure that information about job opportunities is circulated as widely as possible, using accessible methods, not restricted to electronic or paper-based to ensure that it reaches all sections of the community.

All applications are welcomed and are considered for selection on the relative merits of the applicant against the job and/or person specification for the position regardless of age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities.

During the recruitment and selection process, the Wheels Project Ltd undertakes:

- Not to ask a prospective employee about their health before offering them work unless it is to check whether the employee can carry out an essential workshop task (such as heavy lifting) or to monitor diversity. 'Health' in this case means physical disabilities and mental health problems.
- Not to ask how much time an employee has taken off work in their previous jobs in an interview.
- Not to treat someone unfavourably because of something connected to a disability. EG correcting spelling mistakes because of dyslexia.
- That disabled people can now claim a particular rule or requirement disadvantages people with a certain disability.
- Not to discriminate against someone who is or has changed their gender (the 'gender reassignment' protected characteristic) - for example, if they take time off work for the process.
- Accept that staff are now free to discuss wages with each other.
- Take note that people making claims can now bring a 'dual discrimination' claim, meaning the tribunal assesses the impact of the two protected characteristics in conjunction ('young Polish') where before they considered each protected characteristic separately ('young' and 'Polish')

Selection criteria and procedures will be kept under review to ensure that individuals are selected, promoted, and treated based on their relative merits and activities. Participants' or candidates' Trade Union activities will not be taken into account during the recruitment or selection process.

Job and person specifications will only include criteria which are objectively required for the duties and responsibilities of the vacancy and will be drawn up before the recruitment process begins. However, if there is a genuine and lawful reason for limiting the vacancy to a particular group, this reason, and the grounds for it will be clearly stated on any advertisements.

Applicants are asked to complete an Equalities Monitoring Form (QA2.3.1 or QA2.3.2) to assist in maintaining staff profiling records and for monitoring purposes. The form is kept separate from all other application documents and does not form part of the selection process.

The full Recruitment Policy and Procedures are available from the Office Manager and are referenced at QA2.4.1

Terms and conditions of employment/engagement

We ensure that terms and conditions of employment/terms of engagement are free from all forms of direct, indirect, and associative discrimination, harassment, victimisation, and discrimination by perception. We have a number of policies to guide terms and conditions of employment to ensure we adopt the correct practices and ensure flexibility with regards to working patterns so that it meets individual need.

Disability and Impairment

Disability is:

The disadvantage and exclusion which arise as an outcome of the interactions between people who have impairments and the social and environmental barriers, they face due to the failure of society to take account of their rights and needs¹.

There is a very important distinction in this definition between **impairment** and **disability**. An impairment is a physical, intellectual, mental, or sensory characteristic or condition, which places limitations on an individual's personal or social functioning in comparison with someone who does not have that characteristic or condition

We value the individual contribution of all colleagues and prospective employees from all sectors of the community. We are committed to facilitating the employment of people with disabilities and retaining individuals who become disabled whilst with us wherever practicable and in order to achieve this, we apply the following principles.

We will:

- Take reasonable steps to ensure that the working environment, working practices, terms and conditions of employment and terms of engagement do not prevent disabled people from taking up positions for which they are suitably qualified and the best person for the job
- Avoid, remove, or alter the barriers to the employment of disabled people, wherever possible when acquiring and fitting out buildings with equipment and devising working practices
- Make reasonable adjustments to recruitment arrangements, the working environment, working practices, roles, responsibilities and to terms and conditions of employment so as to ensure that no person with a disability is placed at an unreasonable disadvantage
- Respond promptly (within 14 days) to requests for reasonable adjustment from our colleagues, albeit further discussions and investigations may well be needed
- Encourage the participation of colleagues, associates, and partners with disabilities to ensure that, wherever possible, our employment practices recognise and meet their needs
- Consult colleagues with disabilities on action to make sure they develop and use their abilities at work
- Provide services and facilities to clients and service users with disabilities where practicable and safe and appropriate.

¹ VSO Handbook on mainstreaming Disability

This means we will:

- 1 Ask staff, trustees, volunteers, colleagues, service users what their needs are regarding aspects of their interface, work, engagement etc with the Wheels Project Ltd in relation to:
 - Travel
 - Food
 - Access/assistance
 - Communication methods
 - Childcare

- 2 Check venues/ workshops/activities to make sure they are accessible for all participants:
 - Meeting rooms/classrooms
 - Toilets
 - Canteen/ food preparation areas
 - Entrance and communal areas

- 3 Make sure presenters/tutors have been told and are equipped to:
 - Use simple language
 - Use clear visual aids
 - Make presentations accessible to all participants

- 4 Make sure documents:
 - Use large font
 - Are in simple language
 - Are as short as possible
 - Are available in forms accessible to all participants

- 5 Try to ensure an atmosphere that enables everyone to participate, and which includes:
 - A variety of activities
 - All participants' views are respected
 - Opportunities for socialising
 - Opportunities for all participants to give feedback

Training, Learning and Development

We aim to provide everyone with the appropriate training, learning and development opportunities to enable them to improve their performance and achieve the performance targets set for them. Opportunities for learning and development are available to everyone based on role/needs of the job and encouraging personal development.

Options for learning and development will include:

- In-house, on the job learning, learning from others in the organisation
- Internal workshops, learning for groups or teams
- Self-sourced learning, open learning books, videos, online
- Secondments and placements
- Visits to other organisations, study tours

Mentoring The Wheels Project Ltd has a Learning and Development Policy/Plan (QA2.11) for all staff, trustees, and volunteers. Equalities training has been confirmed (July 2012 Board) as a mandatory part of induction training for staff, volunteers, and trustees. Annual reviews of policies – including the Learning and Development Policy/Plan means that staff

will receive Equalities Training refreshers annually and when individual needs have been identified. This training will be undertaken via online or on-site training dependent upon the numbers of individuals requiring training.

We will encourage a Board member and/or member of staff to take the lead as an Equalities Champion and have responsibility to ensure this Policy is maintained and developed as part of the Wheels Project Ltd quality management system. Team meetings and other formal meetings and reviews will provide an appropriate venue for discussions and training in Equality and diversity. We will provide written information and guidance and associated FAQs to all staff and stakeholders, and this will be held visibly on our website and on display in our premises.

Promotion

Promotion within The Wheels Project Ltd is based on merit and the reasonable requirements of the job as well as the ability of the Organisation to sustain the terms and conditions arising from of any new post or promotion. All employees, volunteers or tutors will be given equal opportunity to progress within the Organisation and our policies and procedures ensure clear and accountable decision-making and selection in this regard.

Procurement

The Wheels Project Ltd will ensure that the way in which we purchase goods, services and facilities reflects our commitment to equality and diversity as well as an environmentally good practice. We have put procedures in place to ensure open and accountable tendering and commissioning processes. We will encourage such businesses through our supply chains, to comply with our policies and good practice and will monitor to ensure they adhere to our policies, values, and principles as they engage with the Wheels Project Ltd.

As a learning organisation, we will seek to improve our knowledge and performance and learn from our colleagues. This means, we will review and implement changes where we recognise good practice from stakeholders. The changes will be added to the Purchasing and Contracts Policy QA2.22

Grievance Procedure

The Wheels Project Ltd operates a Grievance Procedure as part of its quality management system. The full procedure is provided in QA 2.2.2 and has been written within the context of the Equality Act 2010.

The aim of the Grievance Procedure is to enable an employee of the Wheels Project who has a grievance to pursue the matter in a systematic manner. It is the principle of the procedure that grievances will be dealt with by all concerned as a matter of urgency. Notwithstanding the existence of this procedure, every effort shall be made to resolve a grievance informally or at the lowest possible operational level in the spirit of conciliation.

If a member of staff, volunteer or trustee believes they are the victim of direct, indirect, or associative discrimination, harassment, victimisation, or discrimination by perception, they may use this Policy to determine the terms of their concern but use the Grievance Procedure to take this forward with the relevant personnel explained in the Procedure.

Complaints Policy and Procedure

The Wheels Project operates a Complaints Policy and a Complaints Procedure which are written within the context of the Equality Act 2010 (QA2.2 and QA2.2.1). The Policy and Procedure are intended to ensure that complaints are dealt with properly and that all complaints by service users, partners, associates, and other stakeholders are taken seriously.

If an associate, stakeholder, service user, community member or other stakeholder believes they are the victim of direct, indirect, or associative discrimination, harassment, victimisation, or discrimination by perception, they may use this Policy to determine the terms of their concern but use the Complaints Policy and Complaints Procedure to take their complaint forward with the relevant personnel explained in those Documents.

The Complaints policy and procedure are publicly available on our website and displayed on the premises.

Review and Monitoring

We are committed to monitoring the effectiveness of this Equality and Diversity Policy and the associated Complaints Policy/Procedures, Grievance Procedure and Learning and Development Policy/Plan. This means that we undertake to review all our policies, procedures, and practices annually as part of the quality management system in place and include additional updates in line with emerging legislation and individual need. If, however, a contract we are delivering as a supplier requires the Wheels Project to review particular procedures and policies more often, we will take the necessary steps to ensure we are able to comply with this requirement.

We will identify and take all steps necessary to eliminate unjustified discrimination or victimisation which is revealed by this monitoring process and take positive action to achieve our commitment and vision for equality and diversity. This means that we will collect demographic and monitoring data on service users, stakeholders, and suppliers as well as staff, volunteers, and trustees. We will produce annual profiles and datasets which will enable us to focus our services most appropriately to meet individual need and to make appropriate management decisions.

We will consult with service users and stakeholders on the methods of data collection and presentation of results to ensure we collect only relevant information and do so in a non-confrontational and non-stigmatising manner in a way which does not intimidate or isolate the respondent. In this respect, we will offer any additional support needed to complete the process.

We will analyse the information to assess its value as intelligence and any gaps that are evident. We will call upon appropriate experts, stakeholders and others who may be able to include additional information and resources.

We will present information in plain English and accessible formats, and we will feed this information to stakeholders and encourage comment to help our future decision-making