

Equity, Diversity, and Inclusion Policy

Date: August 2022

This document is a Policy.

A policy is a formal statement of principles and commitment. It informs volunteers and employees why the organisation must take certain action. Compliance with policies is mandatory to protect the organisation, its personnel and service users from risk. St John People must adhere to St John policy at all times. Please ensure that you refer to St John Connect for the most up-to-date copy of this policy.

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1 Purpose and Scope

- 1.1 This policy is applicable to all St John people.
- 1.2 This Equity, Diversity, and Inclusion (EDI) Policy is designed to ensure that the work and volunteering environment is free of harassment and bullying and that everyone is treated with dignity, privacy and respect whether they are a patient, customer, volunteer, casual worker, employee or anyone otherwise connected to St John.
- 1.3 Compliance with this policy should also ensure that employees and volunteers do not commit unlawful acts of discrimination and that we continue to be compliant with regulatory requirements e.g., Equality Act 2010, Care Quality Commission.
- 1.4 This document is not meant to exhaustively cover all aspects of EDI, but to provide a broad framework under which we (St John and its people) should all be operating within. This means that the absence of reference to a specific situation should not be taken as an indication that it is or is not covered by the policy. St John reserves the right to apply reasonable discretion and interpretation of the scope of this policy when considering individual circumstances.

2 Policy Statement

- 2.1 St John is committed to creating an equal, inclusive, and diverse organisation that provides a high quality and safe service to all members of the community. The aim is for St John to be truly representative of all sections of society and our customers, and for each employee and volunteer to feel respected and able to give their best.
- 2.2 We aim to create a shared sense of belonging for all St John people and to promote and reflect equity, inclusion, and diversity in our local community.
- 2.3 We do not tolerate any discrimination relating to issues of equity, inclusion, and diversity in any aspect of the organisation or its work.
- 2.4 Everyone involved with St John has a duty to ensure this statement is upheld in all that we do.

3 Values in Action

- 3.1 In order to bring our strategic goals to life, St John uses its values to guide its thinking and actions. This Policy will implement those values in the following ways:
 - **Humanity:** St John will proactively drive, promote, and support an inclusive and diverse culture ensuring this underpins our approach to policies, practices, and workplace behaviours. Fostering an environment of mutual respect and where our people have a sense of belonging.
 - **Excellence:** St John will continuously learn, develop, and improve EDI to enrich and improve the experiences and outcomes of our people.
 - **Accountability:** St John will champion and drive EDI through our EDI Steering Group to deliver meaningful cultural change and the adoption of new mindsets, behaviours, and attitudes.
 - **Responsiveness:** St John will continue to develop our understanding of and provide tailored support to the needs of our diverse people and communities, ensuring that our services are accessible to all, which will always be handled with sensitivity and compassion.
 - **Teamwork:** St John will engage, involve, and support our people to work collaboratively as one team with the aim to progress EDI. We endeavour to build a safe, open, and supportive culture where our people can bring their whole selves to work.

4 The Equality Act 2010

- 4.1 [The Equality Act 2010](#) came into force on 1 October 2010. The purpose of the Act is to simplify discrimination legislation and create a more consistent and effective framework, while at the same time extending discrimination protection. Its general purpose is to eliminate discrimination, harassment, victimisation, or any other prohibited conduct.

5 Underlying Principles of Discrimination

- 5.1 No unlawful discrimination shall occur directly or indirectly because of a protected characteristic.
- 5.2 **Protected characteristics:**
- Age
 - Disability (including mental health)
 - Sex
 - Gender reassignment
 - Pregnancy and maternity
 - Race (which includes colour, nationality and ethnic or national origins)
 - Sexual orientation
 - Religion or belief
 - Being married or in a civil partnership.
- 5.3 We recognise that there are additional vulnerable groups, such as family, carers, and those in different socio-economic groups, and we aspire to treat them in line with the protected characteristics as listed above.
- 5.4 Discrimination after employment is also unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.
- 5.5 **St John's stance on discrimination:** Employees, volunteers, casual workers, contractors, or anyone associated with or working on behalf of St John must not discriminate against any other individual or group (internal or external) for a reason related to one of the protected characteristics or for any other reason which cannot be objectively justified. This policy also applies at St John-related functions held away from St John premises and/or outside of normal work or volunteering times.

6 Types of Discrimination

- 6.1 **Direct Discrimination** is where a person is treated less favourably than another because of a particular characteristic. In limited circumstances, employers can directly discriminate against an individual for a reason related to a protected characteristic if there is an occupational requirement which is crucial to the role. For example, an employer may state that it will only employ a woman in the position of a Women's Domestic Abuse Advice Worker as a genuine occupational requirement.
- 6.2 **Indirect Discrimination** is where a criterion or practice is applied evenly but is discriminatory for people with a particular characteristic because it is detrimental to them and cannot be shown to be a proportionate means of achieving a legitimate aim. For example, it may be indirect discrimination against women to say that a job can only be done by full-time employees because women are significantly more likely to be in part-time employment than men.
- 6.3 **Harassment** is where there is unwanted conduct that has the purpose or effect of creating an intimidating, humiliating or offensive environment. It does not matter whether or not this was intended. Examples include inappropriate jokes and teasing.

- 6.4 **Associative Discrimination** is where an individual is discriminated against for association with another person who has a particular characteristic. For example, treating someone less favourably because they are the parent of a child with a disability.
- 6.5 **Perceptive Discrimination** is where an individual is discriminated against based on a perception rather than fact. For example, treating someone less favourably because they are presumed to be gay.
- 6.6 **Victimisation** occurs where an individual is subjected to a detriment, such as being denied a training opportunity or a promotion because they:
- have made a complaint
 - intend to make a complaint
 - have supported a complaint, or
 - is suspected of making, intending to make, or supporting a complaint.
- 6.7 However, an individual is not protected from victimisation if he or she acted maliciously i.e., makes, or supports a complaint knowing it to be untrue.
- 6.8 **Failure to make reasonable adjustments** is when a physical feature or a provision, or criterion or practice puts a person with a disability at a substantial disadvantage compared to someone who does not have a disability, and when that organisation has failed to make reasonable adjustments to enable the person to overcome the disadvantage.
- 6.9 **Positive Discrimination** is treating someone more favourably because of a particular characteristic where there is no good reason to do so. Positive discrimination in employment is generally unlawful. For example, in the recruitment context, unlawful positive discrimination would be where an employer recruits a person simply because he or she has a protected characteristic rather than because he or she is the best candidate for the job.
- 6.10 However, an employer may take Positive Action towards people with a protected characteristic in certain circumstances e.g., providing training for a certain group, where that group is under-represented in a particular activity. Positive Action is about treating people differently in order to 'level the playing field' and give them more equal access.

7 Complaints

- 7.1 If you feel that you may have been discriminated against or if your complaint involves bullying or harassment, you may use the appropriate grievance procedure to make a complaint, alternatively you may contact [Freedom to Speak Up](#) for confidential advice, assistance, and support. Further guidance may be found in our [Anti-Bullying, Victimisation and Harassment Policy](#).
- 7.2 We will take all complaints seriously and will promptly investigate seeking to resolve any grievance that it upholds. Any grievance that is upheld may be subject to disciplinary action. You will not be penalised for raising a grievance or concern in good faith, even if the grievance or concern is not upheld.

8 St John EDI Commitments

- 8.1 St John will continuously seek to review its policies, procedures, and practices to ensure it complies with the Equality Act 2010:
- 8.2 **For all St John people, St John will:**
- Oppose and avoid all forms of unlawful discrimination in all areas of work including recruitment, promotion/progression, opportunities for training, discipline and (for employees) pay and benefits, selection for redundancy for example
 - Ensure job/role descriptions and person specifications are limited to those requirements that are necessary for the effective performance of the role; that candidates are assessed (e.g. for

employment, progression or promotion) objectively against the requirements for the role, taking account of any reasonable adjustments that may be required for candidates with a disability; long term health conditions and that disability and personal or home commitments for example) will not form the basis of decisions to appoint except where necessary and justifiable

- Undertake the on-line EDI Mandatory training
- Ensure that applicants who have declared a disability and meet all the essential criteria, are shortlisted for interview.
- Undertake proper risk assessments and evaluation of individual situations, to assess the reasonableness of the adjustment balanced with the role requirements, working environment and any regulatory, Health & Safety, or other statutory compliance obligations.
- Ensure that no adjustment for one individual takes precedence over the rights for another, and where areas of conflict exist, seek to identify ways to resolve the situation.
- Consider any possible indirectly discriminatory effect of its standard working practices

8.3 For customers, patients, suppliers, and others, St John will:

- Oppose and avoid all forms of unlawful discrimination. Demonstrate and seek to promote the principles of EDI through the effective implementation of this policy
- Make reasonable adjustments to overcome barriers to access and use of services caused by disability: i.e. the removal, adaptation, or alteration of physical features, where these features make it impossible or unreasonably difficult for people with disabilities to make use of services
- Take positive action where reasonably practicable to overcome barriers to access and use of services experienced by people with other protected characteristics
- Ensure that the expression of beliefs and opinions does not contravene the St John HEART values or its capability to carry out its work
- Ensure that any adjustments to accommodate any individual who falls under a protected characteristic, does not place any other individuals at risk, or contravene any regulatory, legal, or statutory obligation placed on St John, including Health & Safety risks
- Consider an assessment of compliance with the Equality Act 2021, as a routine aspect of all procurement exercises, as appropriate
- Investigate complaints and respond fully and fairly

9 Accountability and Responsibilities

Trustees

- 9.1 The Board of Trustees is responsible for setting the vision for EDI and providing strategic leadership across this agenda.

People Committee

- 9.2 The People Committee is responsible for endorsing St John's EDI strategy and policy and recommending adoption to the Board of Trustees. They will seek assurances on the adequacy of the arrangements for delivering the aims and objectives outlined in the strategy, review progress against actions emerging from these and provide direction on the management of related risks/issues.

Executive Committee and Executive Leadership Team

- 9.3 The Executive Committee is responsible for leading by example, in creating a culture at St John that promotes and embeds EDI principles.
- 9.4 The Executive Leadership Team is responsible for championing EDI across their areas of operation. It will ensure that there are sufficient resources to consider how to improve our St John policies, practices and service delivery in this regard and actively address issues when identified to support delivery of St John's EDI strategy.

EDI Steering Group

- 9.5 The Steering Group has the responsibility and accountability to drive the priorities for St John and reports to the Executive Leadership Team and People Committee.

People Networks

- 9.6 People Networks provide a safe space for St John people to share, learn, educate and drive EDI work and champion the agenda across the organisation. They report into the Steering Group and provide recommendations to progress delivery across their identified priorities.

9.7 People and Culture Director

The People and Culture Director is the owner of St John's EDI strategy and policy. They are responsible for ensuring all St John people are aware of and understand the policy, processes that are in place to ensure compliance with the policy and to deliver the ambition articulated in the strategy.

Head of EDI

- 9.8 The Head of EDI will develop, review, and lead delivery of the EDI strategy and policy. They will recommend mechanisms to raise awareness and embed EDI. They will also implement training and introduce resources to support St John to comply with the Equality Act 2010.

St John People

- 9.9 St John people will ensure that a robust equity impact assessment is conducted to consider the EDI implications of a proposed policy, practice, function or programme on all St John employees, volunteers, clients, patients and/or contractors. This assessment should not only identify any implications but consider any measures that can be implemented that can advance inclusion across the organisation. All policy owners, project leads and change leads have a duty to complete an equity impact assessment.
- 9.10 St John people will respect and involve people who use our services and assist St John in its commitment to implementing this policy and actively contribute to our culture of EDI. They will comply with and promote this policy and not discriminate against colleagues, suppliers, customers, or patients using or seeking to use goods, facilities or services provided by the organisation or anyone else.
- 9.11 St John people will report any bullying or harassment by customers, patients, suppliers, visitors, or others to their line manager who will take the appropriate action. They will be aware that behaviour, actions, or words that transgress the policy will not be tolerated and will be dealt with in line with our Disciplinary procedures. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice. In addition, individuals can be held personally liable as well as, or instead of, St John for any act of unlawful discrimination. In other words, an individual who commits a serious act of harassment may be guilty of a criminal offence.
- 9.12 St John people will raise any areas of non-compliance with any aspect of this policy or its supporting procedures, this should be raised to the head of function or director through the line management structure. The head of function or director must ensure that any risks arising from non-compliance are recorded on the relevant risk register and proportionate mitigation action is put in place

St John people in supporting roles such as Freedom To Speak Up, Health and Wellbeing Champions and Conflict Resolution Practitioners

- 9.13 St John people in the above supporting roles will signpost the appropriate support that currently exists within St John, such as the People Networks. They will escalate concerns relating to EDI via their governance structure to the Head of Equity, Diversity and Inclusion and ensure there is appropriate monitoring, review and reporting of the actions agreed to address the EDI related concerns.

10 Policy Compliance

How compliance with this policy will be measured, by whom and how frequently:

Compliance measure – what we will measure	How will it be measured?	Owner	Frequency	Who will it be reported to?
Incidents of discrimination and bullying	Central logging and monitoring of grievances raised	Director of People & Culture,	Annually	ELT and ExCo
Employee engagement, inclusiveness and belonging, freedom to speak up	Pulse Survey benchmark to show increase in confidence and trust	Director of People & Culture	Bi-annually	ELT and ExCo
Representation in recruitment and selection	Equality Monitoring	Director of People & Culture	Annually	ELT and ExCo
Embedding HEART Values	Pulse Survey and EDI Training	Director of People & Culture	Annually	ELT and ExCo

11 Policy Review and Maintenance

This policy will be reviewed every two years or if there is a change to external regulatory requirements or a change to internal processes.

12 Document Control

Title	EDI policy
Version	2.0
Original Expiry Date	July 2025
New expiry date (approved by the Boards of Trustees on 18 February 2025)	September 2025
Date approved by ELT	August 2022
Policy live date	September 2022
Policy owner	Director of People & Culture

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Stakeholders consulted in development	EDI Steering Group People Networks ELT EDI Advisory Group National Employee Forum
EDI Impact Assessment Completed	Yes
For action	All St John People
For information	All St John People
Supersedes	1.0
Supporting procedures and guidelines	Grievance Procedure (both Employee & Volunteer) Disciplinary Procedure (both Employee & Volunteer) Anti-bullying, Victimisation & Harassment Policy Reasonable Adjustments Policy (TBC)

13 Terminology

This document contains the following key words.¹

Shall/Must	Equals 'required to'. It is used to indicate mandatory requirements to be strictly followed to conform to the standard and from which no deviation is permitted.
Should	Refers to items regarded by St John as minimum good practice, but for which there is no specific legal requirement. Volunteers and employees should follow the good practice guidance unless there is an agreed reason not to.
Will	Used only in statements of fact: is deprecated and shall not be used when stating mandatory requirements
May	Equals 'is permitted to'. Used to indicate a course of action permissible within the limits of the standard
Can	Equals 'is able to'. Used for statements of possibility and capability, whether material, physical or causal
Accountable	Answerable for the action
Ensure	Will make certain that the action has occurred.

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¹ Adapted from Charity Commission standard definitions (charitycommission.gov.uk).