



---

# Smaller Authorities' Audit Appointments

## **Equality, Diversity, and Inclusion Policy**

**17 Jul 2024**

<b>Gov. Doc. No</b>	<b>Version</b>	<b>Author</b>	<b>Date Agreed</b>	<b>Distribution</b>	<b>Review Date</b>
23	1	CEO	17 Jul 2024	SAAA Website, Board members	Jul 2027

## **1. Statement of Commitment**

- 1.1. SAAA (the company) is committed to promoting equality, diversity and providing an inclusive and supportive environment for all and eliminating unlawful discrimination (see paragraph 8 for types of unlawful discrimination.)
- 1.2. This Policy is for the benefit of all staff, Board members, and its service users.
- 1.3. This policy is intended to set out how company will fulfil this statement of commitment and monitor its progress.

## **2. Responsibility for implementation**

- 2.1. The CEO has ultimate responsibility for the initial implementation of this policy. Their role is to create HR policies that provide a framework to deliver leadership that drives an encouraging and supportive working environment.
- 2.2. This policy will be reviewed at least every two years, to ensure it remains commensurate with the law and best practice. The CEO will oversee the implementation of this policy advising the Board on progress and highlighting any key issues as appropriate.
- 2.3. The Board is responsible for monitoring the implementation of all equal opportunities policies and procedures.
- 2.4. The CEO has overall delegated responsibility for coordinating the delivery of the day-to-day operation of all HR policies and procedures.

## **3. Employee's and Director's Responsibility and Liability**

- 3.1. Every person has a part to play to assist the company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination. Employees and directors can be held personally liable as well as, or instead of, the company for any act of unlawful discrimination. Those who commit serious acts of harassment may be guilty of a criminal offence.
- 3.2. Acts of discrimination, harassment, bullying or victimisation against employees or serviced users are disciplinary offences and will be dealt with under the company's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.
- 3.3. All Board members and staff have a responsibility to:
  - 3.3.1. Listen to what others have to say in respect of their views
  - 3.3.2. Report to their line manager or to the CEO, any incidences of discrimination, bullying, harassment, verbal or physical abuse or aggression
  - 3.3.3. Feel empowered to challenge own prejudices and those of others
  - 3.3.4. Know your individual rights and responsibilities in relation to the law
  - 3.3.5. Participate in relevant training
  - 3.3.6. Proactively promote and celebrate diversity
- 3.4. The CEO is responsible for ensuring that all staff are aware of this policy. This policy will be available on the internet and any updates will be circulated

to all staff and Board Members. All staff and Board Members will receive the appropriate training/development and support to understand their responsibilities on this policy.

#### **4. Grievances**

- 4.1. If you (as an employee) consider that you may have been discriminated against, you should use the company's grievance procedure to make a complaint.
- 4.2. The company 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 complaint is untrue and/or made in bad faith

#### **5. Equal opportunities in employment**

- 5.1. The company will avoid unlawful discrimination in all aspects of employment including (but not limited to); recruitment, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy.
- 5.2. Recruitment and selection procedures will be reviewed and updated in the light of emerging equalities legislation.
- 5.3. All employees and board members undertaking roles within recruitment and selection processes on behalf of the company will be trained in recruitment & selection and equality issues.
- 5.4. SAAA will make opportunities for training, development, and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.

#### **6. Our Commitment as A Service Provider**

- 6.1. As a service provider, the company is committed to preventing unlawful discrimination of its users. the company will not discriminate unlawfully against those using or seeking to use the services provided by the company and will ensure that SAAA's services are tailored to the needs of the individual, and that staff are aware of and responsive to the needs of different sectors of the community.
- 6.2. SAAA will work to ensure that the company information, services, and events are accessible. SAAA will work to reduce the barriers people may face due to disability or language by making reasonable adjustments and arranging appropriate translation, interpretation or transcription materials or equipment when necessary.
- 6.3. If you think SAAA are not providing a service in line with this policy or if you think you have been treated unfairly in any way, you can complain to the company, using SAAA Complaints Procedure and Procedure.

## 7. Equal Opportunities monitoring and evaluation

- 7.1. The company's policies and procedures when reviewed will be reviewed to ensure that they comply with this Policy and to take account of changes in the law.
- 7.2. Where considered appropriate, SAAA will carry out equality monitoring activities among service users/non-users in order to ensure services are relevant to meet their needs. SAAA will take action to overcome under representation when this has been identified.
- 7.3. The company treats any personal data collected for reviewing equality and diversity in accordance with the data protection policy.

## 8. Types of unlawful discrimination

- 8.1. **Direct discrimination** is where a person is treated less favourably than another because of a protected characteristic. In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.
- 8.2. **Indirect discrimination** is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.
- 8.3. **Harassment** is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.
- 8.4. **Associative discrimination** is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.
- 8.5. **Perceptive discrimination** is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic.
- 8.6. **Third-party harassment** occurs where an employee is harassed and the harassment is related to a protected characteristic, by third parties.
- 8.7. **Victimisation** occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he/she is suspected of doing so. However, an employee is not protected from victimisation if he/she acted maliciously or made or supported an untrue complaint. 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.

## **Annex A**

### **List of Protected Characteristics**

1. age
2. gender reassignment
3. being married or in a civil partnership
4. being pregnant or on maternity leave
5. disability
6. race including colour, nationality, ethnic or national origin
7. religion or belief
8. sex
9. sexual orientation