



Policy Date	December 2024
Date of Next Review	

Equity, Diversity and Inclusion Policy

Aims and Introduction

It is our ambition to become a sector leader in demonstrating and promoting equity, diversity and inclusion, and removing racism and institutional racism from every aspect of our work.

Westway Trust is dedicated to the wellbeing of the communities we serve, and providing opportunities for connection, growth and progression. We strive to create and sustain a culture of equity for the communities of North Kensington and we firmly believe that to serve our purpose, our internal ways of working must follow the same fundamental principles and we must proactively seek to dismantle barriers, eradicate discrimination and create a safe and welcoming environment where everyone who works for us can perform to their full potential.

Without these foundations of fairness, opportunity for all, and eliminating discrimination, we know we cannot fulfil our organisational goals, fully embody our values, or serve our communities as they deserve.

The purpose of this policy is to set out our approach to equity, diversity and inclusion for everyone who works or volunteers with us, or applies to work for us.

It aims to ensure that:

- We make equity, diversity and inclusion central to all we do.
- Everyone is treated with dignity and respect, regardless of any protected characteristic defined by the Equality Act 2010, combination of protected characteristics, or any socio-economic or other demographic factors.
- Everyone understands their personal responsibility for knowing what discrimination is and for reporting any witnessed or suspected incidents of discrimination, harassment, sexual harassment or victimisation.



- We develop a culture of inclusion that attracts and retains staff and volunteers with a wide range of backgrounds, circumstances and lived experiences, and we embed inclusive practices into all aspects of our work, individually and collectively.
- Fair and non-discriminatory behaviours and treatments apply to all areas of employment including recruitment and selection; training and development; benefits, rewards and promotion; and dealing with grievances and all other formal processes.
- No form of direct or indirect discrimination, bullying, harassment, sexual harassment or victimisation will be tolerated within our Trust.

Background

This policy has been reviewed and updated as part of our vital and continuing processes of continual improvement and transformation, following the findings from the Tutu Foundation (UK) 2020 review into a long-term culture of institutional racism within the Trust.

Only through recognising the immense cost of our Trust's institutional racism upon individuals and communities; and scrutinising and proactively eliminating the organisational policies and behaviours which have allowed or instigated mistrust and unjustness, will we be able to work towards being the fair, purposeful and community-centred organisation our communities deserve – and a place of work which has a culture of trust and where all employees can thrive and feel that they belong.

We aim to become an anti-racist organisation. We have committed to put in place an Anti-Racism Action Plan by March 2025 to ensure change and accountability in every aspect of our work and structures.

This policy and any accompanying procedures will be updated following the publication of the Anti-Racism Action Plan.

By embarking upon the urgent case of working towards visible actions and results, we hold ourselves accountable for seeking eradication of racism and of discrimination of any type. Our essential and continued focus upon addressing historic and continuing disadvantage and mistrust from a race perspective, in no way lessens our commitment to eliminating and tackling all types of unjust, offensive or unlawful treatment of any individual, or group of individuals.



This is firmly in the belief that if we make substantial improvements from a race perspective this will have a positive effect upon our attitudes towards all other discrimination. Our experience emphasises the need for proactive intervention, a 'listen and learn' approach with measurable actions, and strenuous accountability to prevent and tackle discrimination in all its forms.

As we continue to work towards systemic change within our Trust, recognise our progress, and the challenges ahead, this policy sets out our approach to equity, diversity and inclusion for everyone who works or volunteers with us.

Application of this Policy

This policy, and its commitments, apply to anyone who works for us, referred to collectively as 'staff'. This includes all our full-time and part-time permanent and temporary employees, bank employees, contractors, volunteers, interns, and apprentices (when this becomes relevant).

It also relates to job applicants and we are committed to delivering a recruitment process which is fair and gives equal access to opportunities for all job applicants; and is trusted by, attracts, and embraces, people with different backgrounds, circumstances and lived experiences.

Definitions

A list of some key terms used in this policy are attached in the Appendix at the end of this policy.

Roles and Responsibilities

This policy is fully endorsed by our Board of Trustees, who hold ultimate responsibility for it, and who together with our Chief Executive are responsible for leading and championing its aims and commitments.

The Chief Executive and Executive Leadership team are responsible for ensuring compliance with this policy.

Accountability for adhering to this policy, upholding its principles in day-to-day behaviours, and for promptly and appropriately drawing any breaches of it to our attention, lies with everyone who works for us.



This policy applies to all conduct in the workplace and also to conduct outside the workplace that is related to work (e.g. at meetings and work social occasions), or which may impact the Westway Trust's reputation. This includes the expression of views on social media, contrary to the commitments expressed in this policy, which could be linked to us.

Our Commitments

The commitments in this policy, which underpin all our other employment policies, seek to ensure that all job applicants and those working or volunteering for us are treated fairly, and can perform to their full potential.

We commit to:

- A working environment that promotes dignity and respect to all. This is an entitlement of all staff and job applicants, and we will not tolerate any form of discrimination, bullying, harassment, sexual harassment or victimisation. This is addressed under our [Dignity at Work and Sexual Harassment policies](#).
- Genuine equality of opportunity to all staff and job applicants. It is our aim that no one is unjustifiably disadvantaged by terms of service, working conditions or requirements.
- Continuously developing a culture which attracts people from a wide range of backgrounds and circumstances, and which embraces the diversity of thoughts, ideas and ways of working that people from different backgrounds, experiences and identities bring to us, listening and learning from the voices of lived experience.
- Going beyond legal compliance to respect and champion uniqueness and identity based upon not only protected characteristics as defined by the Equality Act 2010, but also socio-economic, cultural and other demographic factors, celebrating diversity in all its forms.
- Advancing, and educating ourselves upon, an intersectional approach which recognises we cannot fully understand the lived experience of someone else. We acknowledge the multiple and complex levels at which discrimination and inequalities are experienced.
- Encouraging all employees to develop their skills and fulfil their potential, and recruiting, promoting, and transferring colleagues on merit - that is, on the basis of aptitude and



ability. Our Recruitment Policy and Procedure explains how we aim to manage recruitment and selection of staff equitably and consistently.

- Ensuring that the principles of this policy are embedded in the wider strategy of the Trust, and applied in all areas of employment including benefits and rewards, training, wellbeing, working arrangements and grievance, capability and disciplinary matters.
- Assessing how our strategies, action plans and policies affect and consider equity, diversity and inclusion; monitor their impact; learn from our past; and ensure policies and plans are regularly reviewed. When considering changes to policies and procedures, we will undertake Equality Impact Assessments where appropriate.
- Engage and consult with staff to understand the obstacles and challenges faced by individuals and by groups, particularly marginalised groups, including through engagement surveys.
- Exposing any organisation we work with who - after the offer of support and development - refuse to take on a positive and proactive approach to equity, diversity, inclusion and anti-racism.
- Raising awareness of equity, diversity and inclusion within our sector, and within wider societal institutions, as our performance against this policy is embedded, including through campaigns and other means.
- Allocation of financial resources to ensure a progressive approach to this policy.
- Fully and promptly investigate any breaches of this policy brought to our attention.
- Monitoring and reporting to the Board against this policy on an annual basis.
- Providing appropriate guidance, support and training to ensure these commitments are fully undertaken.

Training

We will promote awareness and understanding of equity, diversity and inclusion amongst staff through the provision of training and guidance.

The purpose of this training is to:



- Inform staff about the Trust's, and their own, legal obligations under the Equality Act.
- Guide staff about using inclusive language and behaviours, in a safe and supportive environment.
- Ensure staff are equipped with any further or specialist skills to undertake their role with a strong understanding and mindset of equity, diversion and inclusion.
- Educate staff about the Trust's history, including its historic discrimination and the steps we are taking to correct it.
- Ensure that the principles underlying this policy, and our Anti-racism action plan are embedded in institutional decision-making.

Breaches

Any cases of discrimination, harassment, sexual harassment, bullying or victimisation will be taken very seriously.

We will take prompt action under our disciplinary policy and procedure if we discover, or receive a complaint, that someone has harassed, bullied, victimised or discriminated against anyone, or any group of people, in breach of our Dignity at Work or Sexual Harassment policies.

If an individual feels they have been subjected to unfair treatment, they are encouraged to raise the matter immediately with their manager or Human Resources. The feasibility and appropriateness of informal resolution should be considered, after which they may decide to make a formal complaint under our Grievance Policy and Procedure. We assure anyone raising a grievance that it will be dealt with promptly and discreetly.

If an individual feels a grievance is not appropriate to the situation, they may consider using our confidential reporting procedure, as explained under our [Whistleblowing Policy](#).

All employees should understand that they, as well as the Trust, can be held personally liable for acts of unlawful discrimination and harassment in the course of their employment, meaning legal action can be taken against them by the victim.

Monitoring

The effectiveness of this policy will be monitored regularly, by measuring progress against our Equality, Diversity and Inclusion Action Plan and Anti-Racism action plans. This will include



annual reporting to the Board.

We will monitor the make-up of our workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equity, diversity and inclusion, and in meeting the aims and commitments set out in this policy.



Appendix - Definitions

Protected characteristics

The Equality Act 2010 consolidated and updated previous anti-discrimination laws with a single act.

Under the Equality Act 2010, there are a number of characteristics relevant to an individual that must not unfairly be considered (if accounted for at all) in decisions relating to any aspect of their working life. These characteristics are called 'protected characteristics.' They are aspects of a person's identity that make them who they are. The 'protection' relates to legal protection from discrimination.

The nine protected characteristics under the Equality Act 2010 are:

- Age
- Disability
- Gender identity (a personal sense of one's own gender. This can correspond to or differ from the sex we are assigned at birth)
- Marriage or civil partnership
- Pregnancy and maternity
- Race (includes race, colour, nationality (including citizenship), ethnic or national origins)
- Religion or belief including philosophical belief and a lack of belief
- Sex
- Sexual orientation

Equality means ensuring everyone has the same opportunities to fulfil their potential, free from discrimination. It is rooted in democratic fairness and provides the same resources to everyone.

Equity means recognising the barriers that some people face in society and acknowledging that some groups are more advantaged than others are. Equity aims to put measures in place to correct this inequality, offering differing levels of support and resources based on individual needs and starting point. Its aim is to ensure equal opportunities for all.

Diversity is any characteristic, dimension, or view that makes us different to each other.



Inclusion means ensuring everyone feels comfortable to be themselves at work and feels the worth of their contribution. It values and takes into account individuals' backgrounds, knowledge, skills and experiences through a workplace's culture, systems, policies and processes.

Racism: prejudice, discrimination, or antagonism by an individual, community, or institution against a person or people on the basis of their membership of a particular racial or ethnic group, typically one that is a minority or marginalised. This can result in a person being treated worse, excluded, disadvantaged, harassed, bullied, humiliated or degraded because of their race or ethnicity.

Institutional Racism: Also known as systemic racism, it is defined as policies and practices that exist throughout a whole society or organisation that result in, and support, a continued unfair advantage to some people and unfair or harmful treatment of others based on race or ethnic group.

The Macpherson Report¹ defined it as: *"The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people."*

Intersectionality – an acknowledgement, and concept for understanding, that discrimination in different forms is linked, cumulative and complex. Different characteristics or aspects of someone's identity (for example race, age, disability) combine to create compounding and multiple experiences of discrimination, disadvantage or oppression, which are unique to each person.

Discrimination

The Equality Act 2010 applies the term Discrimination to four main types of unlawful discriminatory behaviour which are: direct discrimination, indirect discrimination, harassment

¹ The [Macpherson Report](#) was published in 1999 by Judge [Sir William Macpherson](#). It was an inquiry into the investigation of the 1993 [racist murder of Stephen Lawrence](#). One of its most significant conclusions was that the Metropolitan Police Force was institutionally racist.



and victimisation. Discrimination is unlawful because it is linked to a protected characteristic. Harassment and victimisation are unlawful because they are either linked to a protected characteristic, or because they relate to sexual harassment.

Direct discrimination – treating someone unfairly because of his or her protected characteristic.

Indirect discrimination – A practice, policy or rule applied to everyone that may at first appear fair or neutral but puts people of a particular protected characteristic at a disadvantage.

Discrimination by association – a person is treated unfavourably because of another person’s protected characteristic.

Discrimination by perception – when someone is treated unfairly because others believe they have a protected characteristic.

Harassment – unwanted conduct that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment – when a person is subjected to unwanted conduct of a sexual nature that has the purpose or effect of either violating their dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. This type of harassment does not need to be related to a protected characteristic.

It also happens if they are treated less favourably because they submitted to, or rejected, that unwanted conduct.

Victimisation – a person is treated less favourably because of being involved in, or suspected of being involved in, a discrimination, harassment or sexual harassment complaint.