



## **CAMBRIDGE ETHNIC COMMUNITY FORUM [CECF] EQUALITY, DIVERSITY AND INCLUSION [EDI] POLICY**

### **Statement of Intent**

CECF (CAMBRIDGE ETHNIC COMMUNITY FORUM) recognises that people are discriminated against for a variety of reasons and that individual and institutional discriminatory practices have meant that some groups have not had equal access to fair employment practices, training, services, nor to opportunities e.g., in volunteering. This then impedes their progression or ability to escape poverty and deprivation. CECF opposes this and is committed to equal opportunities and anti-discrimination in all its principles, policies, and practices.

#### **The Equality Act 2010 sets out the nine characteristics that are protected by law:**

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

For more information on the Equality Act please see [Equality Act 2010 | EHRC \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/equality-act-2010)

#### **Values and Beliefs**

CECF believes that all people have a right to employment and to services which are free from direct and indirect discrimination on grounds of race, colour, caste, ethnic or national origin, religion, political affiliation, social class, employment or financial status, sex, disability (physical, mental, sensory impairment and learning disability), marital status, HIV/AIDS status, language (including the language of D/deaf and visually impaired people), gender identity, sexual orientation, age, caring responsibilities or non-relevant criminal conviction. The only exception that CECF will make to this is if religious, political, or other beliefs are the cause of discriminatory behaviour that violates the principles of this policy.

CECF believes in equality of opportunity and values all individuals regardless of any collective identity. We do not believe in a hierarchy of discrimination. However, as a race equality infrastructure organisation, CECF are particularly focused on eliminating race discrimination and ensuring equality of opportunity and support for people from Black and Minoritised Ethnic (BME) communities, including refugees and asylum seekers. BME Communities are defined by CECF as any

minority group e.g., Black, Asian, Chinese, Irish, East European, migrants, Gypsies / Travellers etc. CECF also includes those of multi-heritage within the BME category. We recognise that there are specific barriers to equality of opportunity for BME people. These include institutional and individual racism, unconscious bias and mainstream policy that marginalises or excludes BME communities, lack of recognition of the specific needs of people from BME communities, and lack of an adequate understanding of how to address these. CECF believe that people of all races, ethnic backgrounds and religions / faiths have the right to live without racial abuse; have access to services which serve and reflect their needs, including cultural needs; and have their lifestyle valued and respected.

CECF is committed to providing both a working environment and services free from direct and indirect discrimination. In order to promote equality and diversity and ensure CECF responds to the needs of all individuals in a fair and equitable manner CECF will raise understanding of discrimination, ensure policy and management that has practices for anti-discrimination and monitor to ensure its EDI policy is carried out effectively. CECF EDI policy applies to Trustees, volunteers, staff members, individual members, member organisations and users of CECF services. Anyone at CECF who wishes to raise concerns about breaches to this policy can contact the Chief Executive Officer to discuss this, or use CECF Complaints Policy.

CECF will do all that it can to promote the principles of this policy with members of the public and external agencies, such as partners and stakeholders.

A copy of this policy will be made available and be accessible to all at CECF. If you wish to see this or raise a concern please contact the Chief Executive Officer at CECF. Please also contact the CEO if you wish to see related policies such as the Complaints Policy, the Dignity at Work Policy and the Code of Conduct.

## CECF EQUALITY, DIVERSITY AND INCLUSION [EDI] POLICY

### 1. Definitions

#### Equal Opportunities

Equal opportunities means to treat someone with fairness irrespective of race, colour, caste, ethnic or national origin, religion (or no religion), beliefs, political affiliation, social class, employment or financial status, sex, disability (physical, sensory impairment and learning disability), marital status, HIV/AIDS status, language (including the language of deaf and visually impaired people), gender identity, sexual orientation, age, caring responsibilities or non-relevant criminal conviction.

CECF is committed to substantive equality. This is beyond formal equality. Formal equality requires implementing fair and neutral processes to ensure equality of opportunity and an end to discrimination as required by the Equality Act 2010. Substantive equality recognises that people may have differential starting positions, e.g., through previous discrimination and applying the same neutral process will not change this difference. Substantive equality requires positive action measures to enable people to start at the same level. Positive action is defined and is part of the Equality Act 2010. CECF will ensure it uses positive measures, as far as possible, to ensure substantive equality of opportunity.

Having a policy does not mean that diversity is achieved, and equal opportunities maintained. All CECF practices must ensure fair treatment. Discrimination must be prevented and challenged. Everyone involved in the CECF has an equal responsibility to work in ways that support the achievement of the policy.

#### Diversity

The concept of diversity encompasses acceptance and respect. It means understanding that every individual is unique, recognising differences. These differences can be based on disability, race, ethnicity, gender, sexual orientation, gender reassignment, language, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies.

#### Inclusion

Inclusion is making the most of everyone's diverse potential. This includes the following in our organisation:

- Developing a more welcoming and knowledgeable organisation
- Enabling all people to receive support to develop their potential
- Developing a more productive, diverse, and satisfied workforce and member base, striving to achieve goals and ambition within an environment that lives our values and purpose.

### 2. Aims of the Policy

In seeking to embed equality of opportunity as a reality and promote diversity, the key policy aims are to:

1. Work to reduce discriminatory practice in Cambridge and the surrounding area.

2. Seek to eliminate discriminatory practices operating within CECF to ensure no Trustees, member of staff, volunteers, individual members, member organisations, partners, supporters, stakeholders, visitors or users experience unfair or unlawful discrimination
3. Increase awareness of the needs of groups experiencing discrimination
4. Work to ensure all members of staff, volunteers, members, and partners understand the various forms and impacts of discrimination.
5. Work to ensure as far as possible that composition of CECF membership, staff and volunteers reflects that of the BME communities of Cambridge and the surrounding area; and to maintain communication with BME communities that are not members
6. Work to ensure that the composition of the CECF Board of Trustees reflects that of the BME communities of Cambridge and the surrounding area as far as possible
7. Ensure services treat all fairly
8. Ensure the premises and equipment at all CECF offices are as accessible as possible.

### **3. Roles and Responsibilities**

#### **Board of Trustees**

As the employer, the Board of Trustees (sometimes referred to as the CECF Management Committee) has overall and final managerial responsibility for ensuring that CECF meets its responsibilities in relation to the Equality Act 2010 and all other relevant or subsequent legislation. The Board of Trustees will be responsible for the development of a strategic commitment to equality and diversity, which ultimately goes beyond a narrow adherence to legal responsibilities. The Board of Trustees will ensure the annual review of this policy and the monitoring and evaluation required. The Chair will have responsibility to ensure this is carried out.

#### **Chief Executive Officer**

The Chief Executive Officer has overall responsibility for ensuring that this policy is put into practice. The Chief Executive Officer will ensure that:

- The Board of Trustees is supported in their role including provision of relevant monitoring and information e.g. updates to legislation
- Day to day practice and provision of services is in line with EDI policy
- Employees and volunteers receive sufficient information and training to enable them to translate this policy into organisational culture.
- Line managers are aware of their responsibilities to their staff and volunteers in relation to EDI
- Arrangements are in place to properly monitor this policy
- EDI is internally driven, from a sense of commitment by the organisation and its employees and volunteers, wherever they are based.
- Work to ensure that the resources to carry out effective EDI work are a core part of income generation.

#### **Line Managers**

All CECF Line Managers will:

- Set targets and goals with timescales.
- Conduct an assessment of staff and volunteer needs in relation to training. Ensure a comprehensive training programme is planned to make staff and volunteers aware of their responsibilities and rights under this policy.
- Ensure existing monitoring criteria is appropriate.

- Contribute to review procedures with monitoring and evaluation processes.
- Monitor the CECF Equal Opportunities Policy in relation to both existing and recruitment of new staff and volunteers, including CECF Board of Trustees.
- Monitor and assess this policy in relation to all aspects of CECF service provision.
- Ensure two reports are presented to the CECF Board of Trustees about the progress made towards the equal opportunities' targets
- Ensure that a commitment to the objectives of this policy is reflected at all levels throughout the organisation.

**It is expected that all Trustees, staff and volunteers will subscribe to and implement this policy and contribute to its ongoing development.**

#### **4. Code of Conduct**

All at CECF will abide by the CECF Code of Conduct with regard to EDI practice. This includes:

- Ensuring that personal and professional conduct is in accordance with CECF values and standards
- Treating all with respect and dignity
- Acting with sensitivity towards diverse cultures and customs
- Keeping conduct free from discrimination, exploitation, abuse, intimidation and harassment
- Respecting human rights
- Ensuring integrity and honesty
- Remaining non-judgemental and refraining from personalising disagreements
- Ensuring that people are not stereotyped and there is no action of any kind that is humiliating or degrading, including jokes
- Taking care to receive challenges to your behaviour or language in a constructive way

#### **EDI Code of Practice**

##### **5. General Practice To Eliminate Discrimination**

Our policy aim of work to eliminate discrimination will be achieved through the continued development and implementation of the following principles and actions.

CECF will:

- a) Maintain its good links with BME communities and groups experiencing discrimination, particularly under-represented communities such as Roma, Gypsy and Traveller communities; migrant workers; new BME residents and asylum seekers and refugees who may be more susceptible to inequality of opportunity within Cambridge and the surrounding area. CECF will endeavour to establish links with newly arrived communities or community groups where no links exist. In order to achieve this aim, CECF will regularly collect information on the ethnic make-up of Cambridge and the surrounding area as well as statistics and information on race crime and discrimination.

- b) Seek and disseminate good anti-racist practice locally and wider, if relevant.
- c) Enable inclusion at events it organises or coordinates. Barriers to inclusion will be addressed through providing (if required and funds permit) interpreters, signers for the Deaf, an induction loop system for those with impaired hearing; and expenses to enable participation. CECF will work to collect resources to ensure implementation of this.
- d) Regularly monitor and review all policies, practices, and procedures to eliminate discriminatory and unequal conditions.
- e) Implement a Code of Conduct for all trustees, staff, volunteers, individual members, member organisations and users of CECF services. Breaches of conduct are, for example, racist, sexist comments and other personally abusive actions and harassment – this list is not exhaustive. CECF will use the Code of Conduct and its powers to challenge prejudices and discrimination.
- f) Run regular anti-racist and equal opportunities/diversity training for all trustees, staff and volunteers.
- g) Help build relevant external agencies' awareness and knowledge of the needs and issues of specific groups in the region, for example, refugees, asylum seekers, Gypsies and Travellers and migrant workers, as well as understanding of good practice to meet these needs.
- h) Ensure all Trustees and staff are informed on changes and developments in equality matters including changes in legislation.
- i) Ensure responsibility for the collection and analysis of statistical data on CECF procedures, practices and services and report back the results to aid the management and implementation of this policy.
- k) Endeavour to ensure that buildings and premises hired and used for CECF co-ordinated events including meetings, trainings, public consultations, interviews, conferences / seminars are accessible, for example for wheelchair users and people with other mobility issues.

## **6. Fair Employment Practice**

### **Employment:**

- CECF will regularly review employment policies and procedures to ensure these are not discriminatory or biased
- CECF will implement family friendly policies in a way that does not detract from the work of the organisation. These will be clear about support to individuals to help them reach an appropriate work/life balance for example with regard to their caring responsibilities
- CECF will make effort to ensure that staff are able to meet particular cultural or religious needs, as long as this does not detract from the work of the organisation e.g. where annual leave is sought on a religious festival it will not be unreasonably withheld

- CECF will make every effort to enable employees with disabilities or who become disabled to work well within the organisation, assisting as far as is reasonable with readjustment/supply of necessary aids and retraining
- CECF will ensure that it does not in any way discriminate on the grounds of maternity and pregnancy

#### **Volunteers:**

- All volunteers will have volunteer agreements stating what they want to get from their volunteering engagement and how to raise concerns
- All volunteers will have regular sessions with staff to provide support and guidance and given access to training, if possible, to assist in their development
- CECF will make every effort to ensure that particular needs of volunteers are met, for example, supporting those with disabilities to participate fully in volunteering

## **7. Recruitment and Selection**

All vacancies at CECF will be subject to an open and fair recruitment process, apart from exceptional cases where the Trustees may decide the post is filled by a secondment. Examples of exceptional cases are:

- When a staff member leaves and there is insufficient time, within the project they work for, to recruit openly
- Where there are urgent deadlines to be met that do not allow for the time for open recruitment e.g., a six-week research project
- Where an open recruitment is conducted and the appointed officer leaves before the probation period is over
- Where it is evident that the job requires specialist knowledge that can only be met through appointment of a known consultant/secondment with the relevant skills, knowledge and expertise

If any of these options are taken it will only be with the compilation of a compelling business case presented to the Board and agreed.

#### **Reviewing vacancies**

As vacancies to paid posts and voluntary roles arise, all appointing officers must review the Job Description and the Person Specification to ensure that it meets the requirements of this Policy.

No arbitrary restrictions will be placed on vacancies. Where any restrictions are applied, they must be justifiable and proportionate, for example any requirement for a driving licence or particular qualifications. All applicants should be made aware that relevant life experience and voluntary as well as paid work are valued.

#### **Advertising**

All job vacancies, other than those in exceptional circumstances, must be advertised. Advertisements should be accessible, for example in terms of layout, language and appropriate images. Advertisements should be distributed, as far as is practicable, through appropriate and suitably diverse external media and organisations. Where the budget does not allow for paid advertising for example through newspaper job ads, the Chief Executive Officer will review circulation through networks to ensure that diversity and accessibility principles are followed.

Specifically, advertisements should ensure:

- That there is a specified closing date and ample time given for submissions of application forms.
- That there are no requirements or criteria which are unnecessary to the post, and which might exclude applicants from any section of the community.
- That emphasis is placed on the availability of flexible working arrangements and/or job share opportunities where appropriate.
- No artificial age barriers are introduced.
- All advertisements state that CECF is working towards equal opportunities and values diversity.
- All advertisements state accessibility in relation to working environments.

### **Short listing and interviewing**

Applications for employment will normally be through a CECF Job Application form. This is to ensure that all applicants have the opportunity to give information for all the questions CECF wants answered. However, CECF accepts that for all potential applicants this could pose an unnecessary barrier and will endeavour to ensure that all applicants can make an application in a way in which equivalent information is received and allows the candidate to reflect their suitability for the post in a way that is relevant to themselves. An example is audiotape. If for good reason, CVs are accepted instead of an application form, the job advertisement will specify the information required.

All applicants will be given equal consideration for appointments. Criteria for short listing for interview and for interviews must be clearly established by the preparation of Person Specifications used to grade applications and equally applied to all candidates. Everyone will be assessed according to his / her personal capability to carry out a given job according to the essential criteria of the Person Specification. General assumptions must not be made about individual applicants and job application forms should not include questions, which seek to determine inappropriate information such as a person's age or sex. Personal information about an applicant cannot be used to determine selection. A monitoring form will be requested from all applicants. This will not be part of the assessment process but can be used for positive action measures as permitted by the Equality Act 2010.

The following will be carried out as part of the selection process:

- Overseas qualifications, degrees, and diplomas, which are rated comparable with UK qualifications, will be accepted as equivalents.
- When a job involves irregular or unsocial hours or travel, the full facts will be referred to in the Job Description or other recruitment literature.
- More than one person will carry out short listing and interviewing. Interview questions will not be of a discriminatory nature.
- The Person Specification will specify where each of the essential criteria will be assessed e.g., in interview or application. All selection decisions will be made on this basis.
- The selection will not be influenced by the perceived prejudices of other staff. An explicit record of the reasons for appointment or non-appointment will be made. Any recruitment records, which monitor the appropriate information to enable equal opportunity analysis, will be kept for 12 months.



- Legislative requirements, for example, checking the right to work will be carried out equally on all candidates.
- Where it is considered appropriate, positive action, as defined by the Equality Act will be carried out.

### **Age restrictions**

In all recruitment and employment matters, age limits will not be applied in a way that is artificial or arbitrary. Age restrictions in employment at CECF will only be applied where reasonably justified. Nothing in this policy can over-ride any statutory provisions (e.g., on minimum ages in employment matters). CECF values the skills and experiences that older people can bring to the organisation. It will work to ensure that all its practices and procedures encourage older people to take up employment opportunities. Where age restrictions are proposed, managers must be able to show reasonable justification for imposing such a limit.

## **8. Career Development and the Provision of Training**

### **Training opportunities**

Relevant training opportunities will be published widely to all employees and volunteers. Training will be encouraged for Trustees, staff, and volunteers without discrimination and with regard to individual circumstances and organisational needs. A training plan for the year will be determined by the Chief Executive Officer following collection of training needs of all. A determined percentage of the salary budget will be allocated towards the cost of appropriate training, if the funding allows.

### **Work / life balance**

Consistent with the needs of the organisation, CECF will encourage initiatives that support staff with a work life balance. This will include combining work with other family or caring responsibilities. None of these initiatives should constitute a barrier to career progression.

### **Cultural and religious needs**

Where employees and volunteers have religious or cultural needs which may conflict with work requirements, managers will consider whether it is reasonably practicable to vary or adapt employment to enable such needs to be met. For example, where annual leave is sought on a religious festival it should not be withheld unless there is a significant detrimental impact on the organisation.

In dealing with such matters managers must seek to balance the operational needs of the organisation with the cultural and religious needs of employees and volunteers. Where appropriate expert advice could be obtained.

### **Employees and volunteers with disabilities**

The organisation will help employees and volunteers who have disabilities or who become disabled to work within the organisation and wherever possible will assist with their rehabilitation and retraining. The aim is to maintain staff with disabilities in employment wherever practicable and to encourage volunteers with disabilities to participate. Reasonable steps to achieve this may involve adjusting working conditions and practices as well as redeployment to alternative work.

## **Individual support / communities of interest**

All workers should have access to support. If for example, a group of workers sharing a collective identity wish to set up a support group then this should be encouraged. If a worker feels isolated, then provision could be made for external support.

## **9. Marketing and Communication**

### **Marketing and publicity:**

- CECF will ensure that publicity will be distributed in a way that promotes equality of access to its services. Publicity will include statements about commitment to equality, diversity and inclusion.
- Marketing and publicity will be written in clear, accessible English in a way that is clearly understood by people from diverse backgrounds. Marketing and publicity will be free from sexist, racist, ageist, disabling, homophobic, transphobic language and images as well as free from any other discriminatory practice.

### **Communication:**

- CECF will create a communication strategy with methods and approaches that are suitable for a diverse number of groups e.g. for those with disabilities, those whose first language is not English.
- CECF will regularly consult with users from particular groups to ensure that there is no inadvertent discrimination in its communication, and that this is accessible and acceptable
- CECF will, as far as possible, categorise groups of users and implement methods that make it possible to communicate with a particular group in the best way
- All communication will be in clear, accessible English without jargon. Where this is reasonable and there are resources, translated and adapted communication will be supplied.
- CECF will ensure that where it is possible, it complies with specific needs to communicate e.g. using signers.
- CECF aims to create a climate of communication, which reflects the needs of different linguistic and cultural groups e.g., by providing interpreters and signers if funds allow. Again, if funds allow information can be provided in a variety of formats and languages on request.

## **10. Service Delivery**

CECF will aim to ensure that its membership, goods, and services are accessible to all and designed to meet needs of the various communities of people who may use or be potential users of services. CECF will pay particular attention to the needs of under-represented groups to ensure there is no inadvertent marginalisation. CECF will aim to make its offices and service venues accessible to all.

CECF will make every effort to take account of the needs of people and groups on low income using services.

CECF aims to ensure that all people will receive a positive and sustained welcome from their first point of contact with the organisation and staff will monitor consumer feedback to develop a better service in relation to equality and diversity.

In order to ensure EDI and accessibility, CECF will:

- Conduct regular reviews to ensure membership, goods and services are accessible to all; provide support as far as possible to meet special needs.
- Collect information on needs, prioritise these and design services/courses to meet top priority needs.
- As far as possible, provide services to tackle additional barriers e.g. low income, lack of English, intersectional barriers e.g. race and age or race and gender, caring responsibilities, disabilities.
- Positively seek user engagement with ways to encourage user representation and inclusion in design and delivery.
- Deliver courses and services in clear, accessible English without jargon and, where it is essential, provide interpretation and translation.
- Collect regular feedback sensitively and appropriately from all users.
- Take positive measures to ensure inclusion of under-represented groups.
- Carry out positive image work at CECF, and ensure this is reflected in course materials.
- Schedule courses and services to coincide with school terms and school times.
- Arrange services and activities in a venue that is accessible for wheelchair users, for example with aids such as ramps, toilet facilities etc.
- Ensure awareness of all staff to offer assistance or if possible, provide aids such as hearing loops.
- Find ways to collect and review suggestions and comments from users and take action needed to enable EDI practice.

## **11. Complaints and Grievance Procedures**

In order to ensure that prompt action will be taken for any breach of this policy:

- Notices will be clearly displayed in CECF premises so that visitors, volunteers and users are clearly aware of how they can raise concerns and complaints.
- There will be clear and accessible grievance and disciplinary procedures that are given to all staff on employment along with employment contracts and other relevant staff information so they are fully informed of their terms, conditions and rights; Staff on induction will be made aware of grievance procedures so that they can use these to raise any concerns regarding EDI.
- Grievances or complaints will not be ignored or treated lightly on the assumption that the person or people raising the issue are over-sensitive to discrimination.
- Centre users or employees who in good faith raise complaints or grievances in relation to discrimination shall not be discriminated against or, in the case of employees, subjected to disciplinary measures.
- All staff sharing a collective identity that may face discrimination will be entitled to establish a support group which can raise concerns. If a member of staff is alone and feels isolated provision of external support will be considered and provided, if reasonable.

If anyone involved with CECF believes that they or anyone else have been treated unfairly in any way, they are entitled to raise the issue. If possible, the first stage in raising an issue should be to discuss the matter with the individual(s) concerned. Where this is not possible, or if this does not achieve the desired results, then the matter, if not from an employee, should be raised formally through the CECF Complaints Policy. Copies are available upon request to the Chief Executive Officer. All complaints will be dealt with seriously, promptly, and confidentially. Staff will need to

raise the matter with their line manager and if this does not resolve the issue through the appropriate employment procedure, e.g. the grievance procedure.

Raising a concern can be a difficult experience and it is essential that support is provided through the process. CECF commits that people using these procedures will be supported and will not experience harassment, discrimination, or victimisation because of invoking a procedure.

Fair procedures will be followed and instigated promptly to minimise potential stress both for the alleged harasser and the complainant. Any complaint of harassment will result in disciplinary action and may warrant dismissal. The CECF's Code of Conduct should be referred to in this instance and is available on request to the Chief Executive Officer.

People raising EDI complaints or concerns will be given a timetable giving response times, in accordance with the CECF Complaints Policy.

### **Harassment**

Every staff member, volunteer and Trustee should respect all other individuals working in any capacity for CECF and recognise that behaviour that they think acceptable may not be regarded similarly by others, because of equality considerations. All harassment and bullying will be dealt with according to CECF Dignity at Work Policy.

Expected behaviour at CECF will be in line with the Code of Conduct which clearly states that harassment can take many forms and may be directed against minority groups or individuals (e.g., because of a person's physical appearance or other characteristic). The Code of Conduct also states that harassment may involve action, behaviour, comment, or physical contact, which is found objectionable, or which causes offence. It can result in the recipient feeling threatened, humiliated, or patronised and it can create an intimidating work environment as well as interfere with an employee's job performance and undermine their job security or with a Trustee, volunteer or service user's participation. The Dignity at Work Policy also defines harassment and victimisation and lays out procedures to deal with these.

CECF strongly believes that harassment in any form at work is entirely unacceptable and that each member of staff carries responsibility for their own behaviour under the policy. This policy aims to prevent all forms of offensive behaviour. Where there is a breach of this policy the person(s) responsible could be liable for disciplinary action. CECF understand that some harassing behaviour may also be unlawful.

CECF will provide support for Trustees, employees, volunteers and service users who allege harassment, and a proper investigation of complaints will take place.

### **Victimisation**

No person will be victimised in any way for complaining about discrimination or harassment and for giving evidence about such a complaint.

## 12. Monitoring

In order to ensure that the EDI policy is being effectively carried out, in terms of groups with protected characteristics, regular monitoring will take place. This will include:

- Collection of monitoring data to collect demographic data according to the protected characteristics of the Equality Act 2010.
- Analyses of data in terms of course level and type for service users and of job category for employees; this demographic data will be used to review satisfaction and achievement of service users and employees to see if there are lower rates for groups with particular protected characteristics.
- Recording of data on an annual basis and measures to show any significant changes.
- Reported to the Trustees and included in strategic planning meetings.
- Action from the Chief Executive Officer to use data to identify areas which may need particular attention and to assess the effectiveness of EDI policy.
- Particular attention given to ascertain if there is any evidence that individuals from any particular group do not apply for certain courses; are not recruited for employment; are under-represented in certain courses or in jobs carrying higher pay, status or authority; are concentrated in certain areas of service in a manner that does not conform to EDI policy.
- Evaluations will be carried out at regular times and will through interviews and sampling, measure further if the equal opportunities policy is being met.

Annually, all complaints and concerns raised will be reviewed to see if there is any discrimination raised regarding groups with protected characteristics or other groups listed in the Statement of Intent that face discrimination. If this is found the Chief Executive Officer will raise this with the Trustees and an Action Plan implemented to deal with this.

Positive Action will be taken where there is under representation of particular groups in certain areas. An annual review will measure this in terms of service users, in employees, in Trustees and volunteers. The Board will look at this and decide if any specific measures need to be taken to encourage better representation.