

**EQUALITIES, DIVERSITY AND INCLUSION POLICY**

# General

* 1. This policy applies to all Missing Link, Next Link and Safe Link Services. Hereafter, any reference to Missing Link applies to all the above services unless otherwise specified.
  2. This policy is publicly available to all interested parties and is issued to all service users, staff, volunteers, Management Committee members, applicants, partner organisations and third-party contractors used by us in delivering our services.
  3. Missing Link acknowledges that discrimination and prejudice exist. The aim of this policy is to challenge and reduce or end discrimination wherever it appears and to ensure that no one is discriminated against or receives unfair treatment in their contact with Missing Link.
  4. Missing Link requires all its partners or contractors to have their own Equalities policy and this is checked as part of due diligence. Whilst on our premises contractors are subject this Policy.
  5. You are expected to adhere to this policy in full and any breach of this policy may be considered as a disciplinary matter. We may amend this policy at any time.
  6. All staff and volunteers are expected to work in line with Missing Link, Next Link and Safe Link’s trauma informed approach, with the starting point being the survivor’s lived experience. This is underpinned by BNSSG Trauma Informed Principles: Safety, Choice and Clarity, Collaboration, Trustworthiness, Empowerment, Inclusivity. Staff and volunteers will be trained on this approach during induction. Please also refer to [Guidance on the Working definition of trauma-informed practice.](https://www.gov.uk/government/publications/working-definition-of-trauma-informed-practice/working-definition-of-trauma-informed-practice)

# STATEMENT OF INTENT

* 1. **Equal Opportunities Statement**
  2. Missing Link welcomes its responsibilities under the Equality Act 2010 including the s.149 Public Sector Equality Duty and is committed to meeting them. Missing Link ensures the promotion of fair treatment and equal access in the delivery of its services and in its employment practices.
  3. Missing Link recognises that certain groups and individuals in society are disadvantaged owing to discrimination directed against them or barriers that are in place.
  4. Discrimination operates through commonly held assumptions and prejudices, which are reinforced by laws, rules and customs. Discrimination works by stereotyping people into different roles, by treating some people less favourably than others, or simply by ignoring them.
  5. Discrimination can be direct, associative, perceptive, indirect, harassment or victimisation. (See glossary at end for definitions). All forms of discrimination are unacceptable, regardless of whether there was any intention to discriminate or not. Missing Link employees and volunteers have a duty to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination. In the first instance, employees and volunteers should draw the attention of their line manager to suspected discriminatory acts or practices or cases of bullying or harassment.
  6. Missing Link is committed to challenging stigma and promoting positive images of the organisation and of service users from under-represented groups in its publicity material and in its contacts with the various communities and other stakeholders within the catchment areas covered by its services.
  7. Missing Link believes in the benefits of practising a policy of Equalities. These include:
* A commitment to the organisation’s Mission Statement and Core Values
* Making the organisation more accessible to service users. We aim to remove any barriers, bias or discrimination that prevents individuals or groups realising their potential and contributing fully to the organisation’s performance and to develop an organisational culture that positively values diversity.
* We aim to encourage, value and manage diversity and we recognise that talent and potential are distributed across the population. We believe it is in the best interest of this organisation to recruit and develop the best people for our jobs from as wide and diverse a pool of talent as possible.
* We are committed to a programme of continual review of best equalities and service delivery practice nationally and regionally and implementing changes to our own provision as necessary and appropriate.
  1. This policy covers service users, applicants for services or for employment, paid staff, volunteers and members of the management committee and is expected to be followed while conducting Missing Link business and business-related social functions.
  2. The aim of this policy is to ensure that all applicants, service users, potential and current employees receive fair and equal treatment in line with the aims and objectives of the organisation and the services operated. It is unlawful to discriminate against anyone with protected characteristics. With some genuine exceptions, described in paragraph 2.9 below, no person will be discriminated against on the grounds of age, gender, disability (including physical, sensory, specific learning disabilities, mental health issues and long term medical conditions), gender reassignment, race (including colour, nationality, and ethnic or national origins), religion or belief, sex, sexual orientation, marriage or civil partnership, pregnancy and maternity, cultural background, responsibilities for dependents, serving and former members of the Armed Forces and their families, HIV status. This list is not exhaustive.
  3. Equalities legislation provides for specific or allowable exceptions to be made where services are to be provided for specific groups within the overall umbrella of the legislation or within the varying types of protected characteristics.

Missing Link’s services use these exceptions to provide services that are for women only.

Next Link South Gloucestershire Domestic Abuse Service provides support to female and male service users and all other genders.

Safe Link, our service for victims of rape and sexual assault, is open to female and male service users and those of other genders.

Where we are approached by men who might otherwise have benefited from our service provision we signpost and direct them to other organisations who do provide appropriate services.

* 1. In addition, some positions and services are dedicated to particular groups, for example we manage an accommodation scheme specifically for women who are from a Black or Minority Ethnic background and employ a dedicated Black and Minority Ethnic worker in the support role. We have dedicated South Asian and Eastern European crisis response services and employ dedicated staff for those roles. We have dedicated Male Victim Services so men can choose if they want to work with a male or female worker, or the specialist black and minoritised or LGBTQ+ staff.
  2. Missing Link believes that it has a responsibility not just to eliminate discrimination but to act positively to promote anti-discriminatory practice and to actively seek ways to be inclusive and to include groups who have not accessed our employment or services or have previously been under- represented in these areas.
  3. Missing Link continuously reviews its service provision and samples service users’ experiences to ensure that indirect discrimination does not feature in any aspect of its operations.
  4. Discrimination is not tolerated and appropriate action will be taken against any individual who breaches this policy according to the procedure. For staff, breaches of this policy will result in disciplinary action being pursued under the organisation’s ‘Disciplinary’ procedure. For service users, this will include referring to the terms of the user’s license or tenancy agreement in conjunction with the organisation’s ‘Warnings and Evictions’ procedure.
  5. Missing Link will ensure that staff, volunteers and service users will not be victimised for raising genuine concerns about any form of discrimination or harassment, or instructed or put under pressure to discriminate against, or harass someone.
  6. Missing Link is committed to creating an environment which is free from unwanted conduct that violates the dignity of staff or creates an intimidating, hostile, degrading, offensive or humiliating environment.
  7. Missing Link will follow the recommendations and guidance of the Equality and Human Rights Commission, in all its employment policies, procedures and practices and in dealing with clients and members of the public.

# Legal Framework and Guidance

* 1. This policy operates within and complies fully the legislative framework (see below) which makes it unlawful to discriminate against certain prescribed groups:
     1. The Equality Act 2010;
     2. the Rehabilitation of Offenders Act 1974;
     3. the Employment Rights Act 1996;
     4. the Human Rights Act 1998;
     5. the Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000;
     6. the Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002;
     7. the Work and Families Act 2006; and
     8. any other relevant legislation in force from time to time relating to discrimination in employment and the provision of goods, facilities or services.

# PROCEDURES

* 1. **Management Responsibility**
  2. The Chief Executive Officer (CEO) has overall responsibility to ensure that this policy is implemented and monitored throughout the organisation. The CEO may delegate this responsibility to Senior Managers for the completion of certain tasks.
  3. Senior Managers

Missing Link expects all senior managers to uphold the Equalities Policy in all aspects of its work. This includes ensuring that all employees are trained in the policy and procedures and that the services we offer and our employment practices honour the policy and commitment of the organisation to equalities. They have a duty to monitor all aspects of employees work in relation to equalities and to investigate and report to the CEO any breaches of the policy.

* 1. All staff and volunteers

All employees have a responsibility to ensure that they understand and follow this policy. Their working practice will reflect a full commitment to equalities and to fair treatment to all. All employees and volunteers have a responsibility to report any breaches of the policy or any discrimination towards other employees, volunteers, service users or members of the public to their line manager.

# Equality Target Setting

# Reviews and Monitoring

* 1. Missing Link sets targets and monitors the effectiveness of the Equalities Policy by collecting and evaluating data on a quarterly basis. Targets are reviewed annually. This information will be used in the following ways:
* to monitor and evaluate the success of the organisation in achieving its aims and objectives;
* to consider how effective the organisation’s policies and practices are in the achievement of its targets;
* to plan for future services and improve performance in service delivery and in achieving our objectives within this Equalities Policy document;
* to measure access to employment and services against which the performance of the organisation will be benchmarked.
  1. Monitoring information is collected and compiled in line with the characteristics described in paragraph 2.8 above and includes the following areas:
* applications for services, employment and volunteering
* refusals of applications for services, employment and volunteering
* starters and leavers for services, employment and volunteering
* types of housing and accommodation offered
* positions of employment
* complaints/compliments
* harassment
* service user profile
* service user engagement in overall services, including consultation forums
* Management Committee members and volunteers

# Implementation

* 1. The Service Manager for each area is responsible for the preparation of a quarterly report including a comparison of the information to current targets. This information is reported to the management committee.
  2. All records kept regarding the above are kept solely for the purpose of monitoring and in line with our Data Protection Policy.
  3. Evaluation of the monitoring information includes consideration of the following:
* whether there is a fair representation of people from all groups in the community, in line with the exceptions noted in paragraph 2.9 above
* the level of customer retention and satisfaction
* the reputation of the organisation in the wider community and in the experiences of other professionals
* how the information compares to the current targets
  1. Appropriate action plans will be drawn and agreed by the Senior Management Team to address under-representation or potential discrimination.

# Employment, Recruitment and Training

* 1. Missing Link’s aim is that the organisation’s workforce at all levels should reflect that of the community. This is monitored annually according to information provided by the local authority demographics information.
  2. This policy covers recruitment and selection, pay and benefits, leave and flexible working arrangements, dress codes, availability of facilities, training and development, promotion and transfer, grievance and disciplinary issues and treatment of employees when their contract ends.
  3. See Recruitment and Selection procedure for further information.
  4. All staff are entitled to fair and equal treatment. Missing Link has a Policy on Harassment and a Grievance Procedure that staff are entitled to use if they feel that they have been discriminated against.
  5. Missing Link values the contribution of staff and supports staff to gain knowledge and skills in their area and to achieve their professional goals.
  6. Missing Link will ensure that all new employees, volunteers, and Management Committee members will receive internal induction on this policy. Equalities training for all staff, volunteers and Management Committee members will be provided by ACAS e-learning and this shall be documented in the Individual Training Plans/Records. Training may include, general Equal Opportunities awareness, Cultural Diversity, Hate Crime awareness or more specific non-discriminatory recruitment training, including Unconscious Bias Training.
  7. Missing Link will ensure we follow non-discriminatory recruitment methods including advert wording, colours and fonts and person specifications:
     + by ensuring that posts are advertised in such a way as to encourage applications from groups experiencing discrimination; adverts will be placed in local press, job centres, targeted media and Voscur etc.
     + by preparing job descriptions which clearly set out what the worker is to do, and person specifications which recognise that relevant experience can be as valuable as qualifications or previous paid employment;
     + by ensuring that in all selection procedures only factors relevant to the requirements of the post are considered, and that the spirit of the policy statement is adhered to;
  8. Recruitment monitoring at all stages of the process including job applicants, those shortlisted and those successful at interview will be undertaken and the data analysed on an annual basis. Any necessary corrective actions will be implemented such as where advertisements are placed, to ensure action is taken to address any under-representation or potential discrimination.
  9. Missing Link will ensure we carry out all necessary checks to ensure an applicant’s eligibility to work in the UK is satisfied.
  10. Missing Link will ensure employees that undertake the same work or work of equal value will receive the same rate of pay and benefits regardless of any protected characteristics.

# Disability

* 1. Missing Link will ensure that reasonable adjustments are made to the business premises and working arrangements for disabled job applicants and employees, and employees who become disabled during the course of their employment.
  2. Missing Link will seek advice where appropriate to ensure premises and services are accessible to staff and service users, for example from the Access to Work scheme run by the Job Centre Plus.

# Service Delivery

* 1. Missing Link’s service users represent a diverse group, with no one person’s needs being identical to another. In consequence, Missing Link does not believe that a ‘one size fits all’ approach is appropriate to meet the needs of individual service users. Service delivery is therefore tailored to the requirements of the individual.
  2. In providing its services Missing Link aims not just to resolve instances of discrimination but to actively follow a policy of inclusion and equality of access to its services for all its actual and potential service users.
  3. In doing so, Missing Link has policies which address this, as follows:
* Referrals and Selection, including the minimising of any instances of exclusion from its services.
* Allocations, which ensures that accommodation is allocated fairly and taking account of the individual’s needs and preferences.
* Health and Safety, ensuring that all accommodation managed is fit to occupy and meets minimum requirements.
* Individual Support Plans.
* Service User Involvement.
  1. Information regarding Missing Link services is available in other languages .and formats.

# Constraints

* 1. Missing Link aims to remove the barriers to accessing services wherever possible and to promote an environment where the service user feels safe and respected. This can be achieved through a variety of means including:
* a service ethos that challenges poor attitudes to, and the labelling of, clients with support needs;
* presenting positive images of women and women with support needs in all aspects of its public image and in any direct work with service users;
* raising awareness of the need to challenge the power in the client–staff relationship with support services being client led and not built around the culture of the organisation and staff preferences as to ‘how things should be done’;
* ensuring that the service is flexible and responsive to the service users’ needs and wishes, and that they feel appropriately supported;
* by considering the engagement of certain displaced groups within the user group and developing services sensitive to particular needs for their inclusion, including but not limited to women who are black or from a minority ethnic background, Lesbian, Gay, Bisexual and Trans survivors of abuse and services for women with dependency issues.
  1. Environmental factors will be taken into consideration. This will be done by ensuring that the office location is accessible for the service users including those with disabilities, close to public transport and with additional facilities

e.g. comfortable meeting rooms, refreshments and child care facilities where appropriate.

# Equality Improvement Action Plan

* 1. Missing Link will continue to work towards identifying unmet need and to plan for future service provision for services that are attractive and meet the expectations and needs of the service user.
  2. Missing Link will maintain active links with organisations working with minority and discriminated against groups with the aim of ensuring that information and referral pathways remain open, and that services can be developed around the needs of those groups.
  3. Missing Link undertakes qualitative audits on all aspects of its service delivery on a regular basis and learns from what is already in place.
  4. Missing Link routinely consults and listens to service users to find out what they want and what they need, as well as what they don’t like. Missing Link supports service users in identifying what their preferences are where these are not clear.
  5. Different ways of working with different individuals or groups will also be considered to enable services to reach a wider catchment.

# Supporting the Individual

* 1. As well as providing a positive environment and framework, Missing Link works with service users as individuals. Individual support plans are designed by the service user together with their support worker, and are used to tailor the support service towards the service user’s goals as they have identified them. In this way Missing Link actively promotes the empowerment of service users and an ethos that promotes self-help.
  2. Missing Link will ensure that employees are aware of the preferred communication methods of service users and communicate in the method and language of the service user’s choice; and that employees will be appropriately trained and knowledgeable with the necessary communication skills. We will ensure that employees use language and expressions that are readily understandable and appropriate to service users.
  3. All service users are encouraged to be as independent as possible and good community-based alternatives for greater integration and settlement are identified as part of any support plan. This may involve engaging support from community organisations.
  4. The review of support plans allows service users to change over time and recognises that different needs can evolve and be addressed.

# Participation

* 1. Missing Link’s Service User Participation and Consultation Policy outlines the mechanisms whereby service users are involved in and consulted with in the decisions taken regarding the running of the organisation and the delivery of services. Missing Link is committed to encouraging participation from service users and to removing constraints.

# Complaints

* 1. Missing Link has a Complaints Policy and Procedure that service users can access if they feel that they have been discriminated against or treated unfairly. This includes all aspects of discrimination and harassment.
  2. Missing Link will treat seriously any complaints of discrimination on any of the stated grounds made by employees, volunteers, Management Committee members, clients or other third parties and will take action where appropriate.
  3. All complaints made by external parties will be investigated in accordance with Missing Link’s Complaints Procedure and the complainant will be informed of the outcome.
  4. In the event of an investigation concerning a complaint against an employee, Missing Link’s Grievance Policy and Procedures will be followed and any action necessary dealt with under Missing Link’s Disciplinary Procedure.
  5. Complaints will be monitored annually and any outcomes/action recorded.

# Policy review

* 1. This policy will be reviewed on an annual basis or earlier if required in light of changes in legislation.
  2. Associated polices will be updated accordingly.

This policy has been endorsed by Sarah O’Leary (an appropriate senior member of staff) and has the full support of the management / board.

Signed

Position Chief Executive

Date 1st February 2024

This statement should be read in conjunction with Missing Link’s:

* + - Dignity at Work and Anti-Harassment Policies
    - Safeguarding Children Policy
    - Safeguarding Adults Policy
    - Reporting Racist Incidents Policy
    - Confidentiality Policy
    - Data Protection and Information Governance Policy
    - Complaints Policy
    - Raising a concern Policy
    - Grievance Procedure
    - Disciplinary Procedure
    - Recruitment and Selection Policy
    - Referrals and Allocations Policy
    - Service User Consultation and Involvement Policy

Copies are available on request.

Appendix A

**Glossary**

**Protected Characteristics**

The protected characteristics as listed in the Equality Act 2010 are sex, sexual orientation, marriage or civil partnership, gender reassignment, race, religion or belief, age, disability, pregnancy and maternity.

# Disability

Under the Equality Act 2010, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

# Gender reassignment

A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex. The person does not have to be under medical supervision.

# Race

Race includes colour, nationality and ethnic or national origins. A racial group can be made up of two or more different racial groups (e.g. Black Britons).

# Religion or belief

Under the Equality Act 2010, religion includes any religion. It also includes lack of religion, in other words employees or jobseekers are protected if they do not follow a certain religion or have no religion at all. Additionally, a religion must have a clear structure and belief system. Belief means any religious or philosophical belief or a lack of such belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour.

# Sexual orientation

Including, but not limited to, bisexual, gay, heterosexual, and lesbian people.

# Direct discrimination

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have.

# Associative discrimination

This is discrimination against someone because they are linked or associated with another person who possesses a protected characteristic.

# Perceptive discrimination

This is discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

# Indirect discrimination

Indirect discrimination can occur when you have a condition, provision, criterion, rule, policy or even a practice in your company that applies to everyone but particularly disadvantages people who share a protected characteristic and which cannot be justified in relation to the job.

# Harassment

Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual*”.*

# Victimisation

Victimisation occurs when an employee is treated badly because they have made or supported a complaint about discrimination or harassment, or raised a grievance under the Equality Act; or because they are suspected of doing so.

# Positive action

Some people with protected characteristics are disadvantaged or under- represented in some areas of life, or have particular needs linked to their characteristic. They may need extra help or encouragement if they are to have the same chances as everyone else. The new positive action provisions held within the Equalities Act 2010 enable service providers to take proportionate steps to help people overcome their disadvantages or to meet their needs.