**Diversity & Inclusion Policy**

Diversity and Inclusion

THFC is committed to having both a diverse workforce and an inclusive organisation, where every employee can achieve their full potential. This policy aims to ensure all THFC employees feel their similarities and differences are respected and celebrated. THFC is committed to achieving a diverse workforce and promoting an inclusive culture.

This policy is reviewed and approved by the Board on an annual basis.

Equal Opportunities

As part of this diverse and inclusive culture, THFC is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, sexual orientation or gender identity. This Policy aims to remove unfair and discriminatory practices within THFC and to encourage full contribution from its diverse community. THFC is committed to actively opposing all forms of discrimination.

Objectives of this Policy

To ensure all THFC employees are treated with respect and feel they belong within THFC.

To prevent, reduce and stop all forms of unlawful discrimination in line with the Equality Act 2010.

To ensure that recruitment, promotion, training, development, assessment, benefits, pay, terms and conditions of employment, redundancy and dismissals are determined on the basis of capability, qualifications, experience, skills and productivity.

Designated Officer

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| Name: | Piers Williamson |
| Position: | CEO |
| Telephone Number | 0207 337 9920 |

We recognise that each of our employees is an individual and we respect and value these differences. We treat all our employee fairly and encourage them to bring their whole self to work, regardless of:

* Gender
* Sexual orientation
* Gender identity
* Race or ethnicity
* Religion or religious belief
* Marital and civil partnership status
* Age
* Physical and mental ability
* Caring responsibilities
* Political opinion

THFC recognises that being an inclusive organisation means recognising, respecting and valuing the similarities and differences of our employees, and creating a culture where all employees feel they belong.

THFC employees have a responsibility to promote this inclusive culture by behaving in a respectful way to all their colleagues. THFC employees are encouraged to challenge or report any inappropriate behaviour that does not support this inclusive culture.

As part of this diverse and inclusive culture, THFC is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. This Policy aims to remove unfair and discriminatory practices within THFC and to encourage full contribution from its diverse community. THFC is committed to actively opposing all forms of discrimination.

THFC also aims to provide a service that does not discriminate against its clients and customers in the means by which they can access the services and goods supplied by THFC. THFC believes that all employees and clients are entitled to be treated with respect and dignity.

Definition of Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

Discrimination may be direct or indirect and includes discrimination by perception and association.

Types of Discrimination

*Direct Discrimination*

This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

*Indirect Discrimination*

This is the application of a policy, criterion or practice which the employer applies to all employees but which is such that:

It disadvantages a group of people who share a protected characteristic when compared with people without it.

The employer cannot justify the need for the application of the policy on a neutral basis; and

The person to whom the employer is applying it suffers detriment from the application of the policy.

Example: A requirement that all employees must be 6ft tall if that requirement is not justified by the position would indirectly discriminate against employees with an oriental ethnic origin, as they are less likely to be able to fulfil this requirement.

*Harassment*

This occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

*Victimisation*

This occurs when a person is treated less favourably because they have brought or intend to bring proceedings, or they have given or intend to give evidence.

Unlawful Reasons for Discrimination

*Gender*

It is not acceptable to treat a person less favourably on the grounds of gender, marital status, civil partnership, pregnancy or maternity, gender reassignment or transgender status. This applies to men, women and those undergoing or intending to undergo gender reassignment.

Sexual harassment of men and women may be found to constitute discrimination due to gender.

Example: Asking a woman during an interview if she is planning to have any (more) children constitutes discrimination on the grounds of gender.

*Age*

It is not acceptable to treat a person less favourably because of their age. This applies to people of all ages. This does not apply to the calculation of redundancy payments.

*Disability*

It is not acceptable to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments will be made to give the disabled person as much access to any services and ability to be employed, trained, or promoted as a non-disabled person.

*Race*

It is not acceptable to treat a person less favourably because of their race, the colour of their skin, their nationality or their ethnic origin.

*Sexual Orientation*

It is not acceptable to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because he/she is homosexual, heterosexual or bisexual.

*Religion or Belief*

It is not acceptable to treat a person less favourably because of their religious beliefs or their religion or their lack of any religion or belief.

Positive Action in Recruitment

Under the Equality Act 2010, positive action in recruitment and promotion applies as of 6 April 2011. ‘Positive action’ means any steps that THFC takes to encourage people from groups with different needs or with a past record of disadvantage or low participation, to apply for positions within THFC.

If THFC chooses to utilise positive action in recruitment, this will not be used to treat people with a protected characteristic more favourably, it will be used only in tie-break situations, when there are two candidates of equal merit applying for the same position.

Reasonable Adjustments

THFC has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:

* Making adjustments to company premises; transferring a disabled employee to a role better suited to their disability;
* Relocating a disabled employee to a more suitable office;
* Giving a disabled employee time off work for medical treatment or rehabilitation;
* Providing training or mentoring for a disabled employee;
* Re-allocating some or all of a disabled employee’s duties;
* Supplying or modifying equipment, instruction and training manuals for disabled employees; or
* Any other adjustments that THFC considers reasonable and necessary provided such adjustments are within the financial means of THFC.

If an employee has a disability and feels that any such adjustments could be made by THFC, they should contact their manager.

Acting on Discriminatory Behaviour

In the event that an employee is the subject or perpetrator of, or witness to, discriminatory behaviour, please refer to the relevant section in this staff handbook.

Advice and Support on Discrimination

Employees may contact their employer or trade union representative if access to such an individual is possible.

Other contacts include:

**Equality and Human Rights Commission** (4 offices)

Arndale House 3 More London

The Arndale Centre Riverside Tooley Street

Manchester London

M4 3AQ SE1 2RG

3rd Floor, 3 Callaghan Square The Optima Building

Cardiff 58 Robertson Street

CF10 5BT Glasgow

G2 8DU

Telephone (England): 0845 604 6610

Telephone (Wales): 0845 604 8810

Telephone (Scotland): 0845 604 5510

Website: www.equalityhumanrights.com

**Citizens Advice Bureau**

Myddleton House

115-123 Pentonville Road

London

N1 9LZ

Website: www.citizensadvice.org.uk

**Community Legal Services Direct**

Telephone: 0845 345 4 345

Website: www.clsdirect.org.uk

**Access to counselling and support services**

THFC offers an Employee Assistance Programme (EAP) available to all employees. This is a confidential employee benefit designed to help employees deal with personal and professional problems that could be affecting their home life or work life, health and general wellbeing.

THFC’s EAP provides expert advice and compassionate guidance 24/7, covering a wide range of issues, offering not only reactive support when someone needs it but also proactive and preventative support to deliver the best possible outcomes.

Responsibility for the Implementation of this Policy

All employees, subcontractors and agents of THFC are required to act in a way that supports the diverse and inclusive culture and does not subject any other employees or clients to direct or indirect discrimination, harassment or victimisation on the grounds of their race, sex, pregnancy or maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

The co-operation of all employees is essential for the success of this policy. The Executive Team and managers are expected to follow this policy and ensure that all employees, subcontractors and agents do the same.

Employees may be held independently and individually liable for their discriminatory acts by THFC and in some circumstances an Employment Tribunal may order them to pay compensation to the person who has suffered as a result of discriminatory acts.

THFC takes responsibility for achieving the objectives of this policy, and endeavours to ensure compliance with relevant Legislation and Codes of Practice.

The Extent of the Policy

THFC seeks to apply this policy in the recruitment, selection, training, appraisal, development and promotion of all employees. THFC offers goods and services in a fashion that complies with the spirit of this policy, is legally compliant and reflective of good practice.

This policy does not form a part of any employment contract with any employee and its contents are not to be regarded by any person as implied, collateral or express terms to any contract made with THFC.

Embedding an inclusive culture

We recognise that to realise the benefits of diversity and inclusion, we will need to focus on four key objectives:

1. Taking positive action and building a culture that champions diversity and inclusion;
2. Building on our current position to further improve representation across the diversity categories;
3. Creating an inclusive culture, that values diversity, both internally and externally;
4. We want diversity and inclusion to be a natural part of what we do, firmly embedded in our culture.

We are seeking to enact meaningful change and embed an inclusive culture by reducing unconscious bias and ensuring all our practices are founded on a principle of equal opportunities. We do this by:

* Reviewing our recruitment processes annually and openly inviting diverse backgrounds to apply for roles and for skilled candidates to be shortlisted. If there are any discrepancies, they are addressed with immediate effect.
* Raising awareness of diversity and inclusion and unconscious bias, by organising relevant training for all staff, managers and internal recruiters where needed.
* Monitoring staff engagement with and experiences of equality, diversity, inclusion and fair treatment through periodic engagement mechanisms (e.g. staff survey).

Raising a concern

To raise a concern or complaint please follow the Grievance Procedure within this handbook. All issues will be taken seriously, no matter who they are from or who it involves. They will be considered and acted upon with a focus on independence, timeliness, and impartiality. We want to ensure that the appropriate support is in place for those who raise complaints and that individuals involved and the organisation takes forward any and all learnings from every complaint.

THFC reserves the right to amend and update this Policy at any time.

**Piers Williamson**

**Chief Executive**

**10 March 2022**