

## Equality Diversity and Inclusion Policy

### Policy Statement

OMG Education (OMG) acknowledges that everyone is different and that, as a business, we will always be opposed to any form of discrimination. Equality of opportunity is about recognising, respecting and valuing the differences of diversity that we each bring to work, learning, and volunteering. This commitment underpins and impacts every activity area and influences how the organisation works and what it does. OMG recognises that many people in our society experience discrimination or lack of opportunity for unfair, just or reasonable reasons.

These include race, religion, national and ethnic origin, political beliefs, gender, sexual orientation, age, disability, HIV status, marital status, responsibility for dependants, geographical origins, social class, income level, or criminal record. OMG is committed to a policy of equality of opportunity which respects each individual's identity, rights and values. OMG is positively committed to opposing all direct and indirect discrimination in the organisation.

### Access to this policy

This document will be made available to any learner, client, employee, visitor, or additional stakeholder requesting it. The policy will be available in either hard copy or electronic format.

A Glossary of Terms has been included at the end of the document to explain some of the terms used in this policy.

### Our Vision

OMG is committed to the principles of Equality and Diversity for its customers, employees, stakeholders and visitors. Our vision for equality and diversity is clear; we want to achieve excellence through inclusion. OMG values for this policy stance are based on integrity, inclusion, transparency and fairness of our service delivery to our learners and clients as well as the people we employ and interact with within the nature of conducting our work.

OMG embraces equality and diversity through its values, aims and objectives, which are reflected in the actions and targets as set out in the range of plans and strategies OMG has committed itself to:

1. Eliminate unlawful discrimination.
2. Promote equality of opportunity.
3. Promote equality of access; and
4. Promote good relations between diverse communities

### The Legal Framework

OMG acknowledges its responsibilities as set out in the Equality Act 2010. The Act protects people who have a 'protected characteristic'. The relevant characteristics are:

- Age
- Disability
- Gender Identity

- Marriage and Civil Partnership
- Pregnancy and maternity
- Race – this includes ethnic or national origins, colour and nationality
- Religion or belief
- Sex
- Sexual orientation.

The Equality Act was introduced on 1st October 2010. It brings together over a hundred separate pieces of legislation, providing a legal framework to protect the rights of individuals and advance equality of opportunity for all.

The nine main pieces of legislation that have been replaced are:

- Equal Pay Act 1970
- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995
- The Employment Equality (Religion or Belief) Regulations 2003
- The Employment Equality (Sexual Orientation) Regulations 2003
- The Employment Equality (Age) Regulations 2006
- The Equality Act 2006, Part 2
- The Equality Act (Sexual Orientation) Regulations 2007

OMG will ensure that policies and procedures are compliant with any forthcoming legislation, Codes of Practice and guidance published by national equalities bodies and Commissions.

Discrimination occurs when a person or group of people are treated on certain grounds less favourably than another. For example, this might occur based on a person's age, disability, gender, gender identity, marital status, race, colour, nationality, ethnic or national origin, religion or belief, culture, sexual orientation or other differences. It must be remembered that individuals can experience less favourable treatment for more than one reason.

There are instances when the law allows for people to be treated differently. This is when a particular requirement or condition is objectively justifiable, e.g., where the job holder provides individuals with personal services and those services can only be provided by a particular sex or the same racial group.

Discrimination can be direct, indirect, associative, perceptive, intentional or unintentional and can be caused by individuals, groups or institutions.

*Note: See the Glossary of Terms at the end of this policy for a more detailed explanation of different types of discrimination.*

The Equality Act 2010 imposes a duty on employers and service providers to make "reasonable adjustments" to accommodate people's disabilities. To promote diversity, we endorse the Social Model of disability, which addresses the disadvantages faced by those with disabilities of whatever kind in employment or access to our services and premises.

*Note: See the Glossary of Terms at the end of this policy for a more detailed definition of disability.*

Institutional racism is defined in the Stephen Lawrence Inquiry Report 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 or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping." At an Institutional level, prejudices become embedded in policies, practices, procedures and criteria for decision-making. These discriminate with the effect of excluding some people in favour of others. This could lead to unequal treatment and inequitable distribution of opportunities, power and resources, depriving some people of a better quality of life. This collective failure of an organisation to provide appropriate and professional service or employment conditions can also be because of a person's age, disability, gender, sexual orientation, religion and belief. At an individual level, a person may hold negative attitudes and use language that could result in inappropriate, discriminatory behaviour or outcomes which are unacceptable.

### **Achieving Equality**

OMG will integrate equality of opportunity and respect for diversity into all aspects of its operational activity.

To achieve our aims, we will:

- Positively promote equality of opportunity and respect for diversity within any leadership, management or senior management role.
- Promote a culture that will encourage the challenging of all forms of unfair discrimination, whether intentional, unintentional, institutional or otherwise.
- Establish clear targets for community improvements within areas serviced by OMG.
- Engage with and listen to the views of our local communities, learners, service users, and stakeholders to assist in developing our future equality agenda.
- Incorporate equality of opportunity into all policies, plans and strategies from the conception.
- Develop services that are appropriate and accessible to all members of the community.
- Provide appropriate training and development in equality and diversity issues for our employees and volunteers (based on need).
- Review, self-assess, audit and report progress annually on our equalities work.
- Work to develop procedures to respond to and address all forms of harassment and victimisation.
- Work with our partners in the statutory, voluntary and private sectors to ensure the best outcomes for people who live, work and visit the communities in which we operate.

### **Equality and Diversity in Service Provision**

OMG's customers, employees, additional stakeholders and visitors can expect the following:

- The design and delivery of appropriate, accessible and effective services to all community members.
- To have provided them with clear and accessible information about our provision in various appropriate formats that meet the needs of all community members.
- The use of effective systems for challenging, reviewing and monitoring our provision delivery to ensure that quality and equality are continuously evaluated and improved and that all community sections receive fair access and outcomes.
- That we ensure that all our employees and volunteers understand what equality in service provision means by providing specific training (based on need).
- That we engage with and listen to all sections of the community in identifying needs and communicating ideas on the way OMG delivers its provision.
- That we monitor and evaluate service uptake concerning age, disability, gender and race.

### **Equality and Diversity in Recruitment, Procurement and Contracting**

To ensure best practices and to promote our values OMG will aim to:

- Ensure that contractors, suppliers, volunteers and partners know our position on equality and are clear about their obligation to provide services free from discrimination, harassment or victimisation.
- Recognise and promote the application of national guidelines and advice in line with our contracting and sub-contracting procedures.
- Ensure that our recruitment, selection and tendering processes positively address and include equality considerations that align with the procedures mentioned above.
- Provide training for relevant staff in equalities issues for procurement.

### **Equality and Diversity at Work**

OMG is a local employer and, as such, recognises that a representative workforce provides greater sensitivity to the needs of our community. Therefore, we have a key role to play in tackling inequalities and discrimination in the workplace. To ensure that equality underpins all aspects of our employment policies, procedures and practices, we aim to:

- Ensure that our employment, training and development policies, procedures and practices comply with this policy and do not discriminate intentionally or unintentionally against any group or individual.
- Monitor our employment processes by age, disability, gender and racial group and take action to address any apparent inequalities.

- Recruit employees in a manner which is fair and open.
- Ensure employees are aware of their responsibility to apply this policy.
- Eliminate discrimination in the provision of training and development to ensure that all employees can realise their full potential and contribute to the development of OMG.
- Ensure that the content of all training and development activities reflects our commitment to equality of opportunity and diversity.
- Promote a culture of fairness and respect in all employment policies, procedures and practices.
- Take positive action to encourage under-represented groups to apply for posts or specific training.
- Ensure pay structures reward all employees fairly, with an equal pay policy in place.
- Recognise that employees have the right to work in a supportive, safe and harassment-free environment, and all complaints are dealt with robustly.
- Make reasonable adjustments, wherever possible, to enable the employment and redeployment of staff with disabilities.

## **Consultation**

This policy document outlines OMG's commitment to consulting with a wide range of stakeholders, including customers, employees, business partners, trustees and local community representatives.

OMG recognises that there are some groups of people we may not have engaged with over time and that their views may therefore be under-represented in any consultation exercises we have carried out. We recognise the value of gaining a variety of perspectives from our local communities, and we will:

- Provide information in accessible formats and consider whether we can offer support for those who need help to participate in a consultation we have organised.
- Provide practical advice, information and contacts for staff that are engaged in a consultation process; this will attempt to provide an inclusive element of all groups who should be consulted.
- Use existing networks and community/partner organisations where appropriate to seek advice, views and opinions;
- Be creative in the variety of consultation methods we use;
- Assess our success in reaching 'hard-to-reach groups by including this as a criterion in our evaluation of consultation.

We will undertake regular employee surveys to measure satisfaction levels concerning the working environment and the conditions we provide and to ensure that we continue developing and maintaining an anti-discriminatory culture across the organisation.

## **A shared responsibility**

Within OMG, all employees have a part to play in challenging discrimination and implementing this policy. Anyone who witnesses a discriminatory incident at work has a duty of care to others to challenge such behaviour and practice.

The Managing Director is responsible for providing leadership in implementing this policy. All employees are responsible for promoting equality and are accountable to the senior management for ensuring equality of opportunity and respect for diversity in all OMG provisions, services and employment.

All Managers are responsible for implementing the policy in their service areas, allocating specific resources to ensure the delivery of equality objectives concerning service provision and employment. They are responsible for ensuring that their employees are adequately informed, trained and supported to carry out their duties under this policy.

All managers are responsible for implementing equality in service provision and employment and for supporting employees to work together to achieve equality. Jamal Miah will be responsible for coordinating the development, implementation, review and evaluation.

All employees are responsible for ensuring that they play their part in implementing this policy. They will also be responsible for improving their awareness of the barriers to equality in service provision and employment, working towards the elimination of these barriers and performing their duties under this policy.

Any Contractors, Partners, Suppliers and Volunteers are to be made aware of our position on equality and be clear about their obligations to provide services that are free from discrimination, harassment and victimisation. Failure to abide by these requirements will be treated as a serious breach of trust and commitment.

Any breach of this policy will be dealt with through OMG disciplinary procedures. Serious offences such as direct discrimination, harassment or victimisation will be treated as misconduct or gross misconduct and may result in dismissal in extreme cases.

OMG is dedicated to providing training (on at least an annual basis) for all employees about removing discrimination and harassment and promoting equality and diversity in the workplace.

## **Monitoring and Measuring Progress**

OMG will monitor and evaluate the effectiveness of this policy through consultation with customers, employees and community representatives.

OMG Senior Management will review this policy annually to ensure it is appropriate and responsive to relevant legislation. Progress towards any set targets or goals will be monitored and reported each year to the Director.

## **How to provide feedback**

OMG welcomes feedback (comments, compliments and complaints) on how well we implement this policy in our services to the local community. For general comments and compliments, or if you believe that you

have been the subject of unlawful discrimination, harassment or victimisation by OMG, you should contact the centre manager first.

If you believe a manager has unlawfully discriminated against someone or failed to treat someone with respect, you should report it to the Director.

Suppose a staff member feels that they have been discriminated against, victimised or harassed. In that case, they should speak to their Line Manager in the first instance or, if not appropriate, then to other members of the Senior Management Team.

Any allegations of this nature will be taken very seriously, investigated and appropriate action taken.

## **Appendix 1: Glossary of Terms**

### **ACTION PLAN**

A practical and realistic plan, with an agreed timetable showing how the policy will be implemented and by whom.

### **AGE**

The Government wants to prohibit unfair practices based on inaccurate assumptions, to remove the barriers faced by people of all ages if they want to work or undertake vocational training.

### **ASSOCIATIVE DISCRIMINATION**

Also known as discrimination by association, this is direct discrimination against someone because they associate with another person with a protected characteristic. This applies to race, religion or belief, sexual orientation, age, disability, gender reassignment and sex.

### **COHESIVE COMMUNITIES**

A cohesive community is one which enjoys the following:

1. A sense of belonging for all members of the community;
2. The different backgrounds of people are valued and appreciated;
3. Equal access to the opportunities life presents;
4. Working towards developing relationships between people from diverse backgrounds in work, schools, and local neighbourhoods.

### **DIRECT DISCRIMINATION**

This is treating a person, without justification, less favourably than another, mainly because of one's feelings, assumptions or prejudices about that person's characteristics, attributes or circumstances. This can include certain forms of harassment or abuse.

### **DISABILITY**

The definition of a disability is broad: "A physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities." Under the Equality Act, "substantial" is taken to mean "more than minor or trivial" rather than "very large".

### **DIVERSITY**

Diversity means "variety". Valuing diversity means valuing people and recognising that everyone is unique/different but of equal worth.

## **EQUALITY ACT 2010**

The Equality Act 2010 provides a cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen the previous legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

Much of the Equality Act came into force in October 2010; however, other provisions in the Equality Act will come into force at different times to allow time for the people and organisations affected by the new laws to prepare for them. For the latest information about the Equality Act, visit the [Government Equalities Office](#) website.

## **EQUALITY IMPACT ASSESSMENT (EIA)**

An EIA is a tool for identifying the potential impact of a council's policies, services and functions on its residents and staff. It can help staff provide and deliver excellent services to residents by ensuring they meet the community's needs.

## **EQUALITY OF OPPORTUNITY**

This means treating people fairly without bias or discrimination and always within the law. Everyone should be entitled to the same opportunities regardless of race, gender, sexual orientation, religion/belief, disability, age or personal circumstances.

## **HARASSMENT**

Defined as: Unwanted conduct which has the purpose of violating another person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

## **INDIRECT DISCRIMINATION**

This is applying, without justification, a request or condition which, on the face of it, applies to everyone but which, in practice, forms a greater obstacle to a person or group of persons with particular characteristics, attributes or circumstances.

## **MONITORING**

The process of collecting, analysing and evaluating information to measure performance, progress or change.

## **PERCEPTIVE DISCRIMINATION**

Also known as discrimination by perception, this is direct discrimination against an individual because others think they possess a particular protected characteristic. This applies even if the person does not possess that characteristic.

## **PREJUDICE**

Means "pre-judgment", forming a view about a person in advance. For example, racial prejudice is having a negative opinion or attitude about an individual or group based solely on their race or skin colour.

## **PROCUREMENT**

The contractual or other arrangements OMG makes to obtain goods, works or services from an outside organisation.

## **RACISM**



All those ideas, beliefs, actions, customs, practices and policies have the effect of disadvantaging and/or discriminating against people because of their skin colour, culture or ethnic origin.

#### **SINGLE EQUALITIES SCHEME**

A timetabled and realistic plan setting out how OMG will meet its aims in this policy.

#### **SOCIAL EXCLUSION**

This term describes what happens to people who are deprived of good quality housing, suffer from unemployment, low incomes, poor health or live in areas of high-level crime.

#### **SOCIAL INCLUSION**

This is when all members of the community have equal access to health, social care and educational opportunities that many others take for granted.

#### **UNWITTING RACISM**

This can arise because of a lack of understanding, ignorance or mistaken beliefs. It can arise from well-intentioned but patronising words or actions. It can arise from unfamiliarity with the behaviour or cultural traditions of people or families from minority ethnic communities.

#### **VICTIMISATION**

Treating people less favourably because of action they have taken under or in connection with the new legislation – for example, making a formal complaint of discrimination or giving evidence in a tribunal case.

#### **WHISTLEBLOWING**

A procedure by which an employee of OMG can formally raise serious concerns about inappropriate conduct or activities within the organisation directly with Senior Managers.