

Diversity, Equity and Inclusion Policy and Procedures

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Commitment

Dallaglio RugbyWorks is committed to the principles of diversity, equity and inclusion, and recognises the importance of adhering to these principles at all times. All that we do will reflect this commitment.

Diversity, equity and inclusion together form a positive approach to recognise that people are different and can make and bring their own unique contribution, experience, knowledge and skills to the organisation and the wider community. Dallaglio RugbyWorks promotes dignity and respect for all, and an environment where individual differences and the contributions of all employees are recognised and valued. Dallaglio RugbyWorks will not unlawfully discriminate against any individuals including those with protected characteristics such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex, gender, and sexual orientation in line with the Equality Act 2010.

This policy is written in accordance with legal requirements, ACAS guidance and best practice.

Overview and Introduction

We recognise that the people who work for us – or who we may want to recruit to do so – and those who use our services are individuals with different needs which may impact on their ability to access many services in our community, including our own services.

In the case of service users this means that we may set up and deliver projects that will work with specific groups in order to increase their chances of accessing the services we provide. We will also work to ensure that all individuals who fit the criteria for our services truly have the opportunity to access and benefit from what Dallaglio RugbyWorks can offer, and this policy sets out how we aim to do this.

Why This Policy Exists

The Equalities Act 2010 sets out the legislation around equality, including what is required of employers in the UK. The aim of this policy is to ensure that Dallaglio RugbyWorks operates in line with this legislation and that no service user, job applicant, employee, secondee or volunteer (including Trustees) is unfairly or unlawfully discriminated against in their dealings with Dallaglio RugbyWorks.

Scope

This policy applies to all areas of Dallaglio RugbyWorks' work and to all staff, by which we mean all employees, volunteers - including trustees - seconded staff, agency staff, interns, students on work placement and anyone who is subcontracted to undertake specific duties. Wherever this policy refers to staff or employees it includes everyone mentioned here unless specifically stated otherwise.

The principles set out in this policy will also be reflected in all contracts and project plans. We will expect anyone we sub-contract or with whom we work in partnership to work in line with this policy or to demonstrate that they have their own appropriate equality policy and practices in place.

It is a condition of employment that all employees respect and act in accordance with this policy. Failure to do so may result in disciplinary procedures being instigated which could lead to dismissal.

All employees will be required to read this policy on joining the organisation.

Roles and Responsibilities

The Senior Leadership Team will set diversity objectives; identify a senior level champion for leading the diversity strategy; secure top-level ownership and sponsorship for diversity, equity and inclusion; and develop and cascade a diversity vision statement.

All staff are responsible for familiarising themselves and acting in accordance with this policy. Employees should inform their manager if they know or suspect that discrimination or harassment is occurring.

Managers will ensure that this policy is communicated to all staff and will provide advice and guidance to staff regarding their conduct along with sources of available support. Managers are required to exercise leadership in this field by encouraging inclusion, discouraging prejudice and modelling appropriate behaviour. They must also take speedy and appropriate action to deal with any breaches of the policy, or behaviour that could lead to a breach of the policy. Any identified breaches of the policy should be dealt with using the Disciplinary or Grievance policies. Managers are responsible for applying employment practices, policies and procedures fairly and consistently, and for highlighting and addressing any practices which could lead to discrimination.

Human Resources will ensure that this policy is implemented and operated in a reasonable and fair manner, provide advice and guidance to individual members of staff and line managers and oversee provision of any letters and documents required.

Audit

Dallaglio RugbyWorks will:

- undertake a full audit in relation to policies and procedures, practice of policy and perception of policy and process
- obtain workforce metrics and compare them with sector and best practice organisations, and
- produce a risk analysis report for board members to act as a catalyst for future activity across the business.

The audit will include a review of all the processes to establish Dallaglio RugbyWorks' position regarding compliance and best practice. This will be done by through participatory and meaningful engagement with staff and young people, including the Youth Animators, facilitating focus groups to explore staff and young people's perceptions, and undertaking interviews with key and stakeholders.

Communication and Consultation

We will:

- establish key lines of communication across the business through consultation with key stakeholders
- undertake an audit of existing communications channels so that compliance and inclusiveness are assured
- ensure that communication imagery and graphics are inclusive, and reflect and reinforce the words within the documentation;
- use trauma-informed, non-stigmatising and strengths-based language when talking about our services, young people, and communities
- distribute a top-level communications plan to senior management for team briefings, and develop "reporting back" communication lines to ensure feedback
- ensure that mainstream business communications reinforce the inclusive messages and become mainstreamed into day-to-day processes, and
- communicate and celebrate Dallaglio RugbyWorks' successes in diversity
- join appropriate organisations to network, exchange best practice and learning.

Policy Development

Dallaglio RugbyWorks will:

- benchmark existing policy statements from other organisations and advisory groups
- develop human resources and other policies (outlining vision, scope, responsibility, accountability and measurements), and

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- cascade new policies with Chief Executive endorsement through business briefings and discussions.

Zero Tolerance

Although treating anyone differently because they have one or more of the protected characteristics is illegal, the Act only specifies two types of discrimination that apply to all of the protected characteristics: direct discrimination and victimisation. Appendix 1 sets out which types of discrimination apply to which protected characteristics.

Dallaglio RugbyWorks has a zero-tolerance approach to any form of discrimination on the grounds of any of the protected characteristics, whether or not the Act applies the specific form of discrimination to a specific characteristic.

The sole exception to this is where a specific service may require us to recruit candidates of one or other sex in order to safeguard the users or staff of that specific service; for example, a service for young women with complex needs may require that we recruit only female workers to work with that particular group. Where this is the case, the service model for that service will explicitly set out why recruitment for workers in that service will be focused specifically on one sex over another and this will be reflected in the recruitment process.

Monitoring and Measurement

Dallaglio RugbyWorks will maintain records of gender, ethnic origin, age and disability for all employees and for internal and external job applicants. This information will be collected and stored in line with the Data Protection Act 2018 (GDPR) and will only be used to monitor compliance with the principles of diversity, inclusion and equality. The information will be analysed at regular intervals by Human Resources.

We will:

- capture all available workforce metrics from existing databases to benchmark against sector companies, demographics and best practice standards;
- agree the aspirational targets for the workforce composition over a five-year period with the Board of Trustees
- establish formal measurement tools to assess the climate in the Company (for example regular staff surveys, 360° feedback mechanisms and diversity perception audits);
- assess progress in achieving its diversity objectives;
- develop relationships with external benchmarking bodies to assess progress (with, for example, Business in the Community, the Prince's Responsible Business Network, Stonewall, Business Disability Forum, and the Equality and Human Rights Commission).

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We will monitor the following characteristics for the people using our services, including:

- Age
- Ethnicity
- Sex
- Disability
- Neurodiversity
- Caring responsibilities

Service Users

Dallaglio RugbyWorks will:

- strive to get feedback on our services from service users
- promote the inclusion of former service users within the staff team
- continue to monitor demographic information of service users so that we can build a representative staff team
- train employees in the relevant practices to ensure they can support young people effectively
- ensure interventions are engaging and gender sensitive to ensure that all excluded young people and girls feel they can take part; and
- carry out DBS checks on employees to protect young people as outlined in the Safeguarding Policy and the Recruitment, Vetting and DBS Policy

Related Policies and Procedures

The following policies and procedures may need to be consulted in conjunction with this policy, as applicable:

- Grievance Policy
- Disciplinary Policy
- Code of Conduct
- Procurement Policy
- Whistleblowing Policy
- Appeals Procedures (set out in each individual policy where these apply)
- Safeguarding Policy

Review

The policy will be reviewed on an ongoing basis to reflect changes in the law, demographics, internal business requirements, and where changes or clarifications are needed. Progress relating to the policy will be recorded annually and reviewed annually by the Board of Trustees.

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Dissemination

This policy will be available to all new staff, volunteers, including trustees, secondees and students on placement. For our new induction process, the policy will be signed off as having been read and understood alongside our online training. The policy will be made available to current and prospective partners, suppliers, funders and others on request.

Behaviours

Dallaglio RugbyWorks is committed to achieving an inclusive and diverse workforce and to providing equal opportunity and access for all. In applying this policy, we seek to create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

The organisation's employment practices, policies and procedures seek to ensure that no employee or potential employee receives less favourable treatment on the grounds of gender, race, colour, ethnic or national origin, sexual orientation, marital status, religion or belief, age, trade union membership, disability, offending background, domestic circumstances (such as caring responsibilities), social and employment status, HIV status, gender reassignment, political affiliation¹ or any other personal characteristic.

Dallaglio RugbyWorks seeks to actively promote best practice in diversity, equity and inclusion across the organisation in areas such as pay and benefits, terms and conditions of employment, dealing with grievances and disciplinary issues, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities. Both employer and employee can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination in the course of their employment, against fellow employees, service users, suppliers and the public.

Employees must conduct themselves in a manner which is in accordance with Dallaglio RugbyWorks' stated values, i.e.: High Energy, Play as a Team, Tell It Like It Is, and Future Focused.

Policy into Practice

Dallaglio RugbyWorks will: promote our diversity, equity and inclusion aims with our staff, partners and other stakeholders. Ensure that staff are aware of their responsibilities in

¹ The exception to this would be affiliation to a political party that is diametrically opposed to the values of Dallaglio RugbyWorks or to the aims and objectives of this policy

implementing this policy. Offer training for staff to enable them to understand and implement this policy:

- Expect compliance with, and commitment to, this policy and take action if any individual is found not to be complying.
- Take appropriate action to deal with discrimination, harassment and victimisation by or against a member of staff.
- Carry out recruitment, selection and promotion in accordance with this policy.
- Ensure that our commitment to equality is plainly communicated in all policies and procedures and is clear in our practices.
- Comply with all relevant legislation including The Equality Act 2010.

Training and Learning

Dallaglio RugbyWorks will:

- conduct a full training needs analysis relating to the understanding and management of diversity, equity and inclusion
- consult key stakeholders and players on the organisational learning requirements;
- evaluate suppliers' training and secure budget for training design and delivery;
- integrate diversity into mainstream training and development programmes;
- establish education programmes for all staff (including programmes that move from awareness to behavioural change); and
- integrate diversity competencies into development programmes and assessment and selection processes.

Recruitment and Employment

Recruitment:

Dallaglio RugbyWorks will:

- Operate fair and inclusive recruitment and employment practices to achieve our operational needs, including use of the 2 Tick scheme for disabled applicants.
- Work to achieve equality of opportunity in all areas of employment.
- Seek to maintain a diverse workforce that reflects the diversity of the communities we serve.

Terms and Conditions of Employment:

We will not apply unjustifiable requirements in our terms of employment or working practices. Care will be taken to ensure that Dallaglio RugbyWorks' policies and procedures do not include

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elements which will or could unfairly or adversely impact on individuals or certain groups of staff or service users.

Promotion, Training and Development:

Selection for promotion will only be based on ability or demonstrated potential to do the job. All employees will be encouraged to take advantage of available, relevant and suitable training and development opportunities.

Online courses will be available and internal courses will be developed to meet specific training needs in relation to diversity, equity and inclusion, and appropriate training events will be provided for all employees involved in selection for recruitment or delivering training.

The responsibilities of the employer and employee for diversity, inclusion and equality will be positively incorporated into employee training at all levels from induction courses to leadership workshops.

Working Environment:

All efforts will be made to make adjustments wherever reasonably practicable for disabled staff, applicants for posts or any staff member making a reasonable request.

Dallaglio RugbyWorks aims to have a working environment and culture where everyone feels comfortable and treated with dignity and respect.

Challenging Policy, Practice and Individuals

Dallaglio RugbyWorks is committed to respectful forms of challenge and healthy conflict resolution. We actively encourage staff to challenge each other when they are feeling uncomfortable and expect them to do so if they notice that this policy is being breached. We will provide information so that staff can access appropriate support to deal with diversity, equity and inclusion-related issues which they cannot resolve themselves.

Our Services

Dallaglio RugbyWorks is committed to equality of opportunity within our services. Where services specifically exclude specific groups of people (e.g., services solely for girls and non-binary young people), we will clearly set out the reasons why this is so.

Access to Services:

We will, wherever possible, make reasonable adjustments to how we deliver services according to individual circumstances. We aim to ensure that no individual or group applying to use our

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services will be treated less favourably than any other person or group of persons for any reason that cannot be justified.

Access to Information:

Where possible – given limited financial resources – information will be made available in suitable formats, such as large print or recorded, where needed to meet a service user's needs. Where possible, we will use an interpreter service to work with people who do not have English as their first language.

Procurement: Contractors, Consultants, Agents and Partners

Dallaglio RugbyWorks is committed to providing equality of opportunity for contractors, consultants and agents, and will apply fair, open and consistent criteria in the selection of contractors and consultants.

We will only seek to work with partners who share our commitment to equality, diversity, and inclusion. We will also work with other community organisations where possible to help us understand the issues of relevance to local communities and groups within those communities and ensure that they are fully included in our work in their area.

Further information about procurement is set out in our Procurement Policy.

Complaints

We will ensure that individual employees who believe they have received treatment contrary to the principles of this policy can have their grievances dealt with quickly and confidentially in accordance with the Grievance Policy.

We will ensure that any service user, contractor, volunteer etc. making a complaint due to any incident which occurs contrary to this policy will have such complaints dealt with quickly and confidentially in accordance with our procedures.

Equality Impact Assessments

In order to support the organisation to achieve the aims of this policy and in line with sector good practice, Dallaglio RugbyWorks will explore the introduction of Equality Impact Assessments (EIAs) where applicable in relation to HR and organisational policies whenever there is a new policy or a change to an existing policy, and in relation to the development of new services and service models.

Any proposed changes to policies, procedures and services will be discussed with team members and our Youth Animators to ensure the impact on any group is taken in to account.

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Appendix 1: Protected characteristics and types of discrimination

Protected Characteristics:

The Equalities Act 2010 identifies 9 protected characteristics:

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

Types of Discrimination:

The Act also identifies 7 types of discrimination:

1. Direct discrimination – treating one person less favourably than another person because of they have a protected characteristic
2. Discrimination by association – treating one person less favourably than another because they associate with a person who has a protected characteristic
3. Discrimination by perception – treating someone less favourably than others because those others think that person has a protected characteristic – it applies even if the person does not in fact have the perceived protected characteristic
4. Indirect discrimination – this can occur if an employer has practices, rules or policies that apply to everyone but that create a disadvantage for people with a protected characteristic
5. Harassment – unwanted conduct specifically related to a 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
6. Harassment by a third party – when an employee experiences harassment from someone who is not employed by Dallaglio RugbyWorks, which may include service users, funders or

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suppliers; this applies if Dallaglio RugbyWorks is aware of the harassment but takes no measures to stop it from happening

7. Victimization – when an employee is treated badly because they have made or supported a legitimate complaint or raised a legitimate grievance under the Act.

Legitimate Aim:

Indirect discrimination may be justified in some cases where the employer can show that it is reasonable and proportionate in achieving the organisation's aims, although this will not include an aim of cost reduction – in other words, the organisation cannot discriminate against anyone with a protected characteristic because not to do so would be too costly, or because to do so would save money. The organisation will need to demonstrate that the indirect discrimination cannot be avoided without negatively impacting on its ability to manage its business. Appendix 2 includes an example of legitimate indirect discrimination.

Appendix 2 – Guidance for Managers on dealing with issues around equality, diversity and inclusion

Dallaglio RugbyWorks is corporately liable for acts of bullying, harassment or discrimination by its employees, but individual managers may also be held personally liable in the event of any legal proceedings being brought.

All Dallaglio RugbyWorks managers are expected to encourage and foster an environment for staff that is free from all forms of unlawful discrimination, bullying and harassment, and to lead by example.

Managers are expected to ensure that staff in their teams are aware of the behaviours expected from them under this policy. Managers are expected to act swiftly if unacceptable behaviour occurs, and to take a zero-tolerance approach to such behaviour.

If a staff member raises a complaint under this policy:

- Find a confidential and quiet place to talk.
- Listen carefully and ensure you understand the full facts.
- Consult with the People Manager and, if applicable, your own line-manager, about what to do next – this may include conducting a full investigation into the complaint and/or invoking the Disciplinary Policy and Procedures.
- Ensure that the staff member raising the complaint is fully supported and knows where and how to access additional support if needed
- While the matter is being investigated and as far as possible protect the staff member(s) against whom the complaint has been made and do not share details of the complaint with anyone not directly involved in the investigation

Reasonable Adjustments

Reasonable adjustments are changes an employer makes to remove or reduce a disadvantage related to someone's disability. For example:

- making changes to the workplace
- changing someone's working arrangements
- finding a different way to do something
- providing equipment, services or support

Reasonable adjustments are specific to an individual person. They can cover any area of work. Employers have a legal duty to make reasonable adjustments to ensure disabled employees are not at a disadvantage.

Examples of reasonable adjustments include:

- making changes to the workplace, e.g., changing the lighting above someone's desk or workstation, or holding a job interview in a room that's accessible for someone who uses a wheelchair
- Providing equipment or support, e.g., specialist equipment (chairs, desks, keyboards), information in alternative formats such as braille or audio, extra training, supervision or assistance
- Changing someone's working arrangements, e.g., changing working patterns
- Finding a different way to do something, e.g., finding a different way to train someone if they find classroom-based training difficult

Reasonable adjustments are specific to an individual person. They can cover any area of work.