



Equality and Diversity Policy

In accordance with Principle 6 of the CLC Code of Conduct, Threemo will promote equality of access and service.

Our commitment

We are committed to:

- recognising diversity;
- preventing and tackling unlawful discrimination;
- promoting equality of opportunity for all our clients and staff and providing an equally high standard of service to all clients, irrespective of their age, disability, marital status, race, religion or belief, sex (including people who have had gender reassignment), or sexual orientation;
- making reasonable adjustments so a person with a disability is not placed at a substantial disadvantage to a person without a disability;
- ensuring all stakeholders and employees comply with the commitments of this policy.

We will comply with Principle 6 of the CLC Code of Conduct which requires us to promote equality and diversity and with the duties of the Equality Act 2010.

We will neither enable nor tolerate any of the following:

Direct discrimination

When a person is treated less favourably than another person due to their age, disability, marital status, race, religion or belief, sex, or sexual orientation.

Indirect discrimination

When a requirement or condition has a disproportionately adverse effect on a particular equalities group and said requirement/condition cannot be justified.

Victimisation

When a person is treated less favourably than other persons because they have made allegations of discrimination.

Harassment

When a person feels that the behaviour of another has violated their dignity, or created an intimidating, hostile, degrading, humiliating or offensive environment for them.



It is against the law to discriminate against anyone because of:

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

These are called 'protected characteristics'.

You are protected from discrimination:

- at work
- in education
- as a consumer
- when using public services
- when buying or renting property
- as a member or guest of a private club or association

You are also protected from discrimination if:

- you are associated with someone who has a protected characteristic, for example a family member or friend
- you have complained about discrimination or supported someone else's claim

Clients

- We will ensure that no individual client, or a client group, is discriminated against in accessing our services and functions or in the quality of service provided;
- Instructions will not be refused on the basis of unlawful discrimination;
- Our complaints handling process is responsive to client's individual needs (particularly those that are vulnerable or have disabilities);
- We will be alert to those clients who may be vulnerable. Please note being vulnerable is not the same as lacking capacity and if employees have concerns that a client does not have capacity, they must inform the Director of People and Compliance in writing, immediately before progressing the case. We recognise a client may be vulnerable because of a range of characteristics, including but not limited to:



- a. basic skills: literacy and numeracy, complexity and confusion, difficulty of accessing and understanding large amounts of information;
 - b. disability or other impairment;
 - c. mental health issues;
 - d. distress or sudden change in circumstances e.g. bereavement, divorce, illness or loss of employment;
 - e. low income;
 - f. age;
 - g. caring responsibilities;
 - h. limited knowledge of, or limited skills in, use of English;
 - i. balance of power, lack of competition and or choice;
 - j. inexperience or lack of knowledge of a particular subject.
- We will assess client vulnerability on a case by case basis.
 - We will ensure we receive confirmation of instructions directly from the client. Where the client wishes to communicate through an intermediary we must:
 - a. obtain detailed instructions;
 - b. be satisfied that the client is not subject to duress or undue influence; and
 - c. be satisfied that the client is entering into the transaction knowingly.
 - If we cannot verify the above the client may be deemed to be a vulnerable person.
 - If an employee considers a client to be discriminated against, victimised or harassed, they must seek immediate written guidance from the Director of People and Compliance. A thorough investigation will be conducted by the Director of People and Compliance and if appropriate, disciplinary proceedings will be actioned.
 - If an employee considers a client to be vulnerable or potentially vulnerable, they must seek immediate written guidance from the Director of People and Compliance. The Director of People and Compliance will assess and implement the appropriate course of action for example whether the client requires:
 - increased levels of communication;
 - direct contact to confirm instructions are understood;
 - text to be enlarged;
 - enhanced instructions for accessing the online hub;
 - information about organisations which may be able to assist them with any difficulties they face such as ACAS, National Debtline, Citizens Advice.

Employees



- We will ensure that all partners, employees and applicants have equal employment opportunities. Our recruitment, appointment, appointment terms and conditions, promotion, training and benefits opportunities will not be discriminatory.
- We will ensure all employees receive regular training to ensure no person within the business suffers discrimination, victimisation nor harassment.

Policy Implementation & Evaluation

- Our Director of People and Compliance is responsible for the implementation of this policy and ensuring all employees are aware of their duties under it, providing training and information as appropriate.
- They will monitor the extent of compliance with this policy across the organisation regularly and at least annually. Appropriate data will be collected to inform this review.
- Allegations of discrimination will be investigated under our grievance procedures. We will take such allegations very seriously and where an employee or stakeholder is found not to have complied with the policy we will take disciplinary action against them.
- We will provide regular training and at least annually to ensure staff are aware of their responsibilities under this Policy.
- This policy will be updated as legislative and regulatory requirements are revised, in light of lessons learned by the business and in view of any good practice identified.