



## Equality, Diversity & Inclusion Policy

In accordance with Principle 6 of the CLC Code of Conduct, Threemo will promote equality of access and service. Threemo is committed to encouraging equality, diversity and inclusion and eliminating unlawful discrimination. We will provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time and our clients.

### Our commitment

We are committed to:

- recognising diversity;
- ensuring that service delivery and employment arrangements, provide equality of opportunity and experience for individuals or groups with the protected characteristics.
- preventing, opposing and tackling unlawful discrimination / victimisation / harassment;
- 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, gender reassignment, marital or civil partnership status, pregnancy or maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex 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.

Threemo and its employees will not take unfair advantage of anyone, including vulnerable people, regardless of whether they are a Client of the business.

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 'protected characteristics':

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

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

We are mindful of the Human Rights Act which incorporated the European Convention on Human Rights into English Law. The basic human rights protected by this legislation include:

- the right to liberty;
- the right to a fair trial;
- the right to respect for private and family life;
- freedom of thought, conscience and religion, and freedom to express your beliefs;
- freedom of expression;
- freedom of assembly and association; and
- the right not to be discriminated against in respect of these rights and freedoms.

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 not ask job applicants questions related to health or disability prior to offering a position nor will we discriminate against someone because they are perceived to have, or are associated with someone who has, a protected characteristic.
- We encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense.
- We will make decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- We will not discriminate, harass or victimise any person in their employment arrangements, offers, terms and opportunities for promotion, transfer or training (or for any other benefit, facility or service).
- We review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- 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.
- We will provide training for managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination. We will ensure all employees receive regular training to ensure no person within the business suffers discrimination, victimisation nor harassment.
- We will take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the



organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

- We will monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy. Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.
- All staff can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.
- We will oppose and avoid all forms of unlawful discrimination. This includes in:
  - pay and benefits;
  - terms and conditions of employment;
  - dealing with grievances and discipline;
  - dismissal;
  - redundancy;
  - leave for parents;
  - requests for flexible working;
- selection for employment, promotion, training or other development opportunities.

#### 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.