

<b>POLICY TITLE:</b>	<b>Equality, Diversity and Inclusion</b>
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<b>Responsible signatory:</b>	Karen Langton, Group HR Director
<b>Outcome:</b>	<p>This policy:</p> <ul style="list-style-type: none"> <li>• Aims to ensure that anyone who comes into contact with Priory Group services is treated equally and fairly.</li> <li>• Aims to ensure that respect for dignity is maintained at all times.</li> <li>• Provides an Equality Impact Assessment.</li> </ul>
<b>Cross Reference:</b>	HR04 <a href="#">General Employment Policies</a> HR04.2 <a href="#">Disciplinary Procedure</a> HR04.3 <a href="#">Grievance</a> HR04.10 <a href="#">Anti-Bullying and Harassment</a> LE03 <a href="#">Data Protection</a> OP03 <a href="#">Complaints</a> OP29 <a href="#">Service User and Carer Involvement</a> PUR01 <a href="#">Purchasing Principles</a>
<b>EQUALITY AND DIVERSITY STATEMENT</b>	
<p>Priory Group is committed to the fair treatment of all in line with the Equality Act 2010. An equality impact assessment has been completed on this policy to ensure that it can be implemented consistently regardless of any protected characteristics and all will be treated with dignity and respect.</p>	

In order to ensure that this policy is relevant and up to date, comments and suggestions for additions or amendments are sought from users of this document. To contribute towards the process of review, email [LegalandComplianceHelpdesk@priorygroup.com](mailto:LegalandComplianceHelpdesk@priorygroup.com)

# EQUALITY, DIVERSITY AND INCLUSION

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## 1 INTRODUCTION

1.1 The aim of this policy is to ensure that Priory Group colleagues put diversity and inclusion at the heart of everything that we do and to highlight the commitment that Priory Group makes to promoting equality and preventing discrimination at work. We want to create an inclusive environment that allows people to reach their full potential. This policy aims to inform colleagues of how equality and diversity is part of carrying out our core business and the activities related to this.

## 2 DEFINITIONS

2.1 Equality is not about treating all people the same, the below definitions have been provided in order to clarify common terms and understanding.

2.2 **Direct Discrimination** – Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic, perception of a protected characteristic or association to someone with a protected characteristic. The nine protected characteristics are:

- (a) Age
- (b) Disability
- (c) Gender reassignment
- (d) Marriage/civil partnership
- (e) Pregnancy/maternity/paternity
- (f) Race
- (g) Religion and belief
- (h) Sex
- (i) Sexual orientation.

2.3 **Indirect Discrimination** – Indirect discrimination can happen when you have a rule, policy or even a practice that applies to everyone but results in creating a disadvantage to individuals who share one or more of the nine protected characteristics.

2.4 **Harassment** – Harassment is unwanted conduct affecting the dignity of any individual, which may or may not relate to a protected characteristic. Harassment may be an isolated incident or a persistent pattern of behaviour. The key with harassment is that the conduct, actions or comments are viewed as unwanted and violates individual dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

2.5 **Victimisation** – Victimisation is the when an individual is treated less favourably, badly or suffers a detriment because they have made or supported a complaint or raised a grievance relating to discrimination or the Equality Act 2010, or because they are suspected of doing so.

### **3 GOVERNANCE, ROLES AND RESPONSIBILITY**

- 3.1 Priory Group has a statutory responsibility to have due regard for the Equality Act 2010 and the Human Rights Act 1998. It is therefore essential the Priory Group achieve a culture where unlawful discrimination is not tolerated. Priory Group is committed to ensuring that equality, diversity and inclusivity is the responsibility of all colleagues and so make the following commitment.
- 3.2 The Priory Group Operating Board/Group Director of HR will ensure that the effective implementation and management of this policy.
- 3.3 This policy applies to all Priory Group colleagues including permanent colleagues, bank workers and workers engaged through or by an employment agency, and all candidates going through a recruitment process.
- 3.4 Where contractors, sub-contractors or third parties are providing services to or on behalf of Priory Group these contractors and third parties will be responsible for adhering this policy. If any issues become apparent with regards to equality, diversity and inclusion in relation to any contractor, sub-contractor or third party, Priory Group will take these incidents very seriously and dealt with in the appropriate manner.
- 3.5 All of the above mentioned have a responsibility to:
- (a) Act in accordance with this policy and Priory Group Values
  - (b) Act fairly and compassionately
  - (c) Treat all people as individuals and take into account their needs
  - (d) Respect privacy and dignity at all times
  - (e) Ensure that individual conduct does not discriminate, harass, victimise or intimidate others or encourage others to do so
  - (f) Take account for individual behaviour and its impact on others
  - (g) Undertake relevant equality and diversity training, including the Priory Group academy module
  - (h) Inform management of any behaviours, activities and actions that undermine equality, diversity and inclusion
  - (i) Promote the equality, diversity and inclusion agenda to help ensure this policy is followed and had maximum positive impact.
- 3.6 Priory Group leadership and people managers have responsibility to adhere to this policy and bring it to the attention of colleagues within their work area in order to establish and maintain an inclusive environment. Managers have a duty to:
- (a) Lead by example, setting the standards of acceptable behaviour and treating people with dignity and respect
  - (b) Promote and ensure an inclusive environment where unlawful discrimination is not tolerated
  - (c) Ensure that all allegations of discriminatory behaviour or practices are correctly investigated and that appropriate actions are taken in accordance with Priory Group policy
  - (d) Ensure that all colleagues are offered equal opportunity to access training, learning and development opportunities, promotion and support within the workplace
  - (e) Consult with relevant HR team for support, advice and guidance for any matters relating to equality, diversity and inclusion.

### **4 POLICY STATEMENT**

- 4.1 Priory Group are committed to the achievement of equal opportunities. It is unlawful to discriminate either directly or indirectly in the recruitment process or at any time during the employment lifecycle because of any of the nine protected characteristics as defined by the

Equality Act 2010 and listed in paragraph 2.2 above. Priory Group also recognises that the Equality Act 2010 makes it unlawful to discriminate directly or indirectly, harass or victimise customers because of a protected characteristic or disability.

- 4.1.1 As such Priory Group will not tolerate:
- (a) Discrimination both direct and indirect as defined by law
  - (b) Discrimination, harassment or victimisation against an individual because they are associated with another individual who has a protected characteristic or perceived to be associated with an individual with a protected characteristic
  - (c) Discrimination, harassment or victimisation of any Priory Group colleagues, service users, visitors or third parties.
- 4.2 Priory Group is committed to being proactive in all matters relating to equality, diversity and inclusion and will value the difference brought to the organisation by a diverse population of colleagues and service users. As such Priory Group are committed to:
- (a) Priory Group services will be accessible and sensitive to the needs of our diverse communities and we will not unfairly discriminate, nor tolerate the unfair discrimination on the basis of a protected characteristic. Priory Group will also not tolerate any practice of unlawful discrimination that result in the provision of a lower standard of service
  - (b) Priory Group will be responsive and adaptive to the individual needs of services users. Services will not be offered based on assumptions, stereotypes or prejudices of any equality groups, instead Priory Group colleagues will deliver services based on information gained and consulting with the service users, family, friends and third parties
  - (c) Priory Group's commitment to equality, diversity and inclusion is not limited to minimum standards as set by the Equality Act 2010. Priory Group is committed to achieving best practice in the area of equality, diversity and inclusion. All individuals who seek to be employed by Priory Group is entitled to equality of opportunity, to be treated with dignity and respect and treatment that is fair irrespective of all nine protected characteristics and all characteristics noted in the quick reference summary
  - (d) Creating an environment in which we recognise and value individual difference and contributions as well as promoting dignity and respect for all.
  - (e) Training, development and progression opportunities are equally available to all colleagues
  - (f) Breaches of this policy will be regarded as misconduct and as such will be dealt with appropriately and could lead to disciplinary proceedings
  - (g) If an individual makes an unfounded allegation of discrimination for malicious reasons, Priory Group will investigate these concerns and act appropriately which could lead to disciplinary proceedings.
- 4.3 **Recruitment** – Priory Group is committed to ensuring that we observe a recruitment process that means the best person for the job is offered employment and that any discrimination is likely to prevent that from happening. Priory Group recognises the equal opportunities policy can assist with the elimination of discrimination and ensure fairness within recruitment by:
- (a) Advertising all vacancies in appropriate ways to ensure the widest possible reach from all sections of the community
  - (b) Regularly reviewing recruitment procedures to ensure that they are fair and consistent & that candidates are selected based on merit and ability to do the job
  - (c) Where appropriate, providing equipment and facilities to enable people with a disability to obtain employment and receive support through their employment which allows them to continue working for Priory Group
  - (d) Provide all colleagues with recruitment and selection responsibilities additional equality, diversity and inclusion as well as additional training in the application of this policy and ensuring that they are aware of its content and provisions.

## 5 **POLICY IMPLEMENTATION, MONITORING AND ASSURANCE**

- 5.1 Priory Group has set out the principles and values for equality and fairness in employment which forms part of the Priory Groups commitment to creating a culture and environment of equality, diversity and inclusivity across all of the group's activities. To achieve the implementation of this policy the Priory Group will:
- (a) Undertake equality monitoring for starters, leavers, grievance and disciplinary hearings
  - (b) Consult widely across the group to see how our services and practices can be improved and regularly assess the impact of current policies and practices
    - i. Collect data on access to services/therapies and activities
    - ii. Conduct satisfaction surveys at consistent, regular intervals
    - iii. Evaluate new approaches/therapies
    - iv. Collate data from Clinician Reported Outcome Measures and Patient-Reported Experience Outcome Measures
  - (c) Promote equality and diversity training to all colleagues and ensuring that new colleagues receive as part of the induction, an introduction to Priory Groups D&I strategy and ambition and their role in achieving this
  - (d) Establish a network of equality and diversity champions with the aim of promoting and raising awareness
  - (e) Set equality objectives at least every three years, ensuring an action plan and annual review in place to ensure Priory Group achieves objectives
  - (f) Publish an annual equality, diversity and inclusion report, which also includes workforce data
  - (g) Establish a diversity and inclusion working group which will support the D&I policy to embed an equal, positive and inclusive environment across the group by:
    - i. Supporting Priory Group with setting and achieving equality, diversity and inclusion objectives
    - ii. Promote and advise on the D&I agenda to help ensure that this policy is followed
    - iii. Advise the business on requirements and performance against legislation
    - iv. Establish and maintain relationships with key stakeholders who have a role in ensuring Priory Group meets D&I objectives
    - v. Work with the L&D team to ensure that colleagues are able to access high quality and appropriate training to support the promotion of equality, diversity and inclusion being embedded into culture of Priory Group
    - vi. Support with obtaining feedback from the business and using this to drive improvements throughout the D&I agenda
  - (h) Priory Group is committed to give all colleagues a voice and respond positively to any feedback or constructive criticism in relation to equality, diversity and inclusion. Priory Group suggests that such feedback should come through the Your Say Forum
  - (i) Celebrate diversity and colleagues from different backgrounds through our communication channels.
- 5.2 For sites in Wales where Welsh is widely spoken, the Legal & Compliance Helpdesk can provide information on how to obtain translated policies.

## 6 REFERENCES

- 6.1 Data Protection Act 2018  
Disability Discrimination (Northern Ireland) Order 2006  
Employment Equality (Age) Regulations (Northern Ireland) 2006  
Employment Equality (Sexual Orientation) Regulation (Northern Ireland) 2003  
Equality Act 2010  
The Equality Act (Sexual Orientation) Regulations (Northern Ireland) 2006  
Equality (Disability, etc.) (Northern Ireland) Order 2000  
Equality Pay Act (Northern Ireland) 1970 (as amended)  
Fair Employment and Treatment (Northern Ireland) Order 1998  
Northern Ireland Act 1998  
Race Relations (Northern Ireland) Order 1997  
Sex Discrimination (Northern Ireland) Order 1976 (as amended)

Special Educational Needs and Disability (Northern Ireland) Order 2005  
Government Equalities Office

**Associated Forms:**

**OP Form: 07** [Full Policy Equality Impact Assessment](#)

## Quick Reference Summary

For quick reference the below is a summary of expectations of all Priory Group colleagues as well as the actions required by this policy. This summary does not eliminate the need to be aware of or follow this policy in its entirety.

1. Understand our equality objectives:
  - Empower, engage and support colleagues
  - Provide inclusive leadership at all levels
  - Ensure that our recruitment and selection process is fair and consistent throughout
  - Deliver better health outcomes, improved patient access and outstanding service levels
  - Have a representative and supportive workforce
2. Treat all colleagues, stakeholder, service users and visitors with dignity and respect at all times
3. Work towards the common goal of providing a positive, safe and inclusive environment that allows our colleagues to thrive
4. Place a high value on diversity and fairness across all business related activities
5. Be a champion for equality, diversity and inclusion supporting the overcoming of obstacles and challenging issues relating to diversity, equality and inclusion when they arise
6. Encourage the participation in group equality, diversity and inclusion events and promotions
7. Diversity is all about acceptance and respect. It means understanding that each of our colleagues is unique and recognising individual differences. We treat our colleagues as individuals, allowing them to be themselves regardless of:
  - Gender or Gender Reassignment
  - Sex or sexual orientation
  - Pregnancy or Maternity
  - Gender Identity
  - Race or Ethnicity
  - Religion or religious beliefs
  - Culture or background
  - Marital or civil partnership status
  - Age
  - Educational background
  - Physical or mental disability
  - Caring responsibility
  - Social Economical Status
  - Physical appearance
  - Any other unjustifiable factors
8. Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups both in employment and services.

This policy is endorsed by the Priory Group Operating Board and fully supported by the Senior Management Teams.