

Contents

1. Purpose	1
2. Scope	1
3. Vision, Values & Aim	2
Future priorities	2
4. Equality Statement.....	2
5. Diversity Statement.....	3
6. Corporate Commitment	3
7. Leadership & Responsibilities.....	4
8. Communication and Consultation	4
9. Forms of Discrimination.....	4
10. Harassment	5
11. Gender Equality.....	5
12. Disability Equality	6
13. Race Equality	8
14. Religion or Belief	8
15. Age.....	8
16. Recruitment.....	9
17. Disciplinary and Grievance Procedures.....	9
18. Guidance to Staff and Managers	10
19. Monitor, Review and Measurement	11
20. Further Information	12
21. Related documents.....	12
Version Information.....	13

1. Purpose

The Equality and Diversity policy sets out APM’s approach to promoting Equality and Diversity. While the policy meets the legislative requirements, APM recognises the importance of ensuring that policies and services are effective in tackling discrimination and in promoting equality and good relations between people of different backgrounds and equality of access and opportunities for all. This policy has been developed to demonstrate our commitment to equality of opportunity to all and celebrates diversity, but also to evidence commitment to continuously improve in this area.

2. Scope

This policy applies equally to everyone within the company, service providers and customers. The promotion of Equality and Diversity concerns all of us and is the responsibility of all employees. We

are all equal when it comes to recognising and promoting equality issues and recognising and celebrating diversity, therefore the implementation of this policy is the responsibility of all members of staff and parties.

3. Vision, Values & Aim

APM's vision is to be a company that is valued by all its stakeholders, which achieves exceptional results in all different aspects of its business. Key to achieving this, APM is committed to providing an excellent welfare to work service, contributing to the wider regeneration and sustainability of local communities.

We understand that in order to provide the commitment necessary to realise this vision, we must exemplify the principles of promoting equality and valuing diversity in all our activities, as a service provider and as an employer. These ambitions can only be achieved through people. APM's employees will reflect the culture, values and ambitions that APM will aim to achieve.

APM's priority will be to tackle all forms of discrimination and exclusion across the main protected characteristics, recognising that any one person may be disadvantaged on more than one of these grounds. We also recognise that there may be other groups who may be vulnerable to discrimination.

Future priorities

Whilst APM is proud of its achievements in the area of Equality and Diversity, it acknowledges that there is more to be done to promote equality and will use the policy to help drive this work forward.

APM is committed to working towards being outstanding in the area of Equality and Diversity and will work to exceed any legal or statutory requirements. In order to achieve these future aims, the HR & Training Manager and designated HR Adviser will work with the Equal Opportunities representative and Heads of Contracts to plan and drive the Equality and Diversity agenda, cascading this throughout the business. This policy will show how equality and diversity will be promoted in every area of APM business and life, such that all employees are able to fully realise their potential and contribute to the achievement of our ambitions.

4. Equality Statement

APM seeks to employ a workforce which reflects the diversity of the wider community. It does so because it values the individual contribution of people irrespective of sex, age, disability, sexual orientation, race, religion or belief, gender, gender reassignment, maternity, or because someone is married or in a civil partnership, or any other personal characteristics.

APM will treat all employees with dignity and respect and will provide a working environment free from unlawful discrimination, victimisation or harassment on the grounds of any of the protected characteristics or other personal characteristics. The protected characteristics are:

- Age
- Disability
- Sex
- Gender reassignment
- Pregnancy & maternity
- Race
- Sexual orientation

- Religion or belief
- Married or in a civil partnership

APM will not tolerate acts that breach the Equality and Diversity policy and all instances of such behaviour, or alleged behaviour, will be taken seriously, be fully investigated and may be subject to the Company's disciplinary procedures. Additionally any person found to be inciting, encouraging or condoning discriminatory actions or behaviour may be subject to disciplinary action.

5. Diversity Statement

APM values innovation and feels that diversity within the team and client base brings positive benefits that will improve and strengthen the business.

The adoption of a Diversity Policy goes further than simply complying with the letter of the law. It aims to get the best from people by treating them fairly and with respect, and providing a safe and rewarding working environment. There are sound operational as well as ethical reasons for having a policy which supports and encourages staff to develop and demonstrate their full potential, including:

- Attracting and retaining employees from the wider community
- Selecting the best person for the role
- Improving individual and corporate performance
- Creating a healthy and constructive working atmosphere and organisational culture
- Enhancing staff morale
- Demonstrating to clients and the community that the Company is a fair and diverse organisation, representative of the local community.

6. Corporate Commitment

The Board and Senior Management are committed to developing and maintaining policies and working practices designed to promote equality of opportunity and to address the elimination of discrimination of any form, in particular discrimination in relation to 'protected characteristics'.

APM will ensure that discrimination in any form is challenged and addressed in all its activities. It will, through systematic reviews ensure that its policies, procedures and practices address any potential or actual discrimination or disadvantage and regular monitoring and evaluation of their effectiveness will be undertaken.

APM will actively challenge discrimination through reviewing its processes, attitudes and behaviour supported with appropriate staff training programmes. APM's grievance procedure will make it clear that instances of discrimination and/or harassment should be raised with the HR department in the first instance to reflect APM's intolerance of such behaviour.

APM will monitor and evaluate the effectiveness of the Equality and Diversity policy with its employees, customers and associated partners.

Equality for staff will be supported by policies and practices which foster:

- equitable recruitment and promotion procedures for all staff
- a staff composition which reflects closely the communities we serve
- a non-sexist, non-racist and disability supportive working environment

- a monitoring and feedback system capable of highlighting areas for improvement
- considering and acting upon feedback from staff when reasonably practical to do so

7. Leadership & Responsibilities

Equality and Diversity is championed by the HR Director (Juliet Mortiss), who liaises with external equality forums and committees ensuring APM exchanges best practice, concerns and ideas on achieving equality and diversity in the workplace. The HR Director will work with the allocated Senior HR Adviser (Jo Patel) and the HR & Training & Manager (Melanie Barratt) on Equality and Diversity plans related to employees.

8. Communication and Consultation

General awareness training on equality and diversity is a mandatory requirement for all new employees and comprises an integral part of induction for new employees. Specific training initiatives will be included in the Equality and Diversity Action Plan.

APM employees and temporary workers will be required to complete mandatory on line training as part of their induction upon joining APM.

Equality and diversity objectives are an integral part of the Mutual Development Review process and will be regularly reviewed by line managers in conjunction with staff members. An annual refresher must also be completed.

APM will seek to involve and consult staff on the Equality and Diversity policy, action points and any other equality and diversity initiatives as appropriate. APM has a number of methods of consulting with and involving staff including:

- Employee opinion surveys
- Director visits
- Business Updates
- Company briefings/conferences and feedback sessions
- Cultural events
- Intranet information bulletins and information
- Interactive quality management system
- Mutual Development Review process
- Give as You Earn scheme
- Employee Value of the Month

9. Forms of Discrimination

The following are the kinds of discrimination which are against the Company's policy:

Direct discrimination: where a person is less favourably treated than another person because of a protected characteristic they have or are thought to have. An example is if someone is refused entry onto a learning programme on the grounds that he or she is black, disabled, homosexual, transgender, of a particular religion or belief or she is a woman

Associative discrimination: this is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

Perceptive discrimination: this is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

Indirect discrimination: where a requirement or condition which cannot be justified is applied equally to all groups but has a disproportionately adverse effect on one particular group. Some examples are:

- where an age limit for new recruits may exclude many women of that age group because they are unable to apply for the job as a result of family commitments, or
- the restricting of recruitment to areas where there are few ethnic minorities

Victimisation: where an individual is treated less favourably because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

10. Harassment

Harassment may be defined as unwanted conduct related to a relevant 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.

The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient. Please refer to our Bullying and Harassment policy for more information.

We will treat all our Employees with dignity and respect and will provide a working environment free from bullying or harassment on any grounds.

We will not tolerate acts that breach this policy and all instances of such behaviour, or alleged behaviour, will be taken seriously, be fully investigated and may be subject to our disciplinary procedures. Additionally, any person found to be inciting, encouraging or condoning such behaviour may be subject to disciplinary action.

APM will not tolerate acts which breach this policy including third parties such as customers and clients. Staff who feel they require guidance and support should contact their HR Adviser.

Employees are also protected from harassment because of perception and association.

11. Gender Equality

We will work with our partners to eliminate sexual harassment, support victims and take action against perpetrators.

Definitions:

- **Sexual Discrimination:** Occurs when someone is treated unfairly or less favourable than others in the same circumstances, on the basis of their gender.
- **Direct Discrimination:** Direct sexual discrimination occurs when a person is treated less favourably than others, in comparable circumstances, on the basis of their gender. For example- An assumption that women are more suited (or not suited) to certain types of work, or are more (or less) available for certain jobs than their male counterparts.

- **Indirect Discrimination:** Indirect sexual discrimination occurs when a condition or requirement is applied which adversely affects or favours one particular group more than another- For example “must have two years’ unbroken service” as a requirement would discriminate unfairly against women, due to women having maternity leave. Indirect discrimination can also occur where sexual harassment is used to create a hostile, abusive or offensive working environment.
- **Sexual Harassment:** “unwanted conduct of a sexual nature, or other conduct based in sex, affecting the dignity of men and women at work. This can include unwelcome physical, verbal and non verbal conduct” (European Commission)
- **Sexual Victimisation:** Occurs when a person victimises another person for bringing a claim or giving evidence in connection with a claim of discrimination or harassment.

APM believes that the organisation will benefit from engaging employees at all levels of responsibility and across all areas of work regardless of their sexual orientation. APM recognises the right of every person to be treated in accordance with these values. APM employees of all sexual orientations have a statutory right to fair treatment under s12 Equality Act 2010. The Act sets out a framework for eliminating employment or occupational inequalities based on sexual orientation, i.e. to ensure there will be no discrimination against employees, either directly or indirectly, on the grounds of sexual orientation in access to employment, training, promotion or dismissal, in the provision of work-place benefits, or the provision of references.

It is APM’s aim to create an inclusive company where people are enabled to meet their full potential and are treated as individuals. This includes recognising and supporting a person’s self-identity as male or female. APM is committed to ensuring that transgender people are treated with respect and that it does not discriminate unlawfully. This commitment is an important aspect of our overall commitment to providing equal opportunities in employment and to ensure that no current or prospective members of staff are subject to discrimination or victimisation as a result of the gender in which they present themselves.

12. Disability Equality

We recognise that 17.5% of individuals of working age are disabled or have a health condition. We are committed to being a Disability Confident employer that recruits and retains skilled disabled people, helping to positively change attitudes, behaviours and cultures, not just in our immediate business but in our networks, supply chains and the communities we work within.

We will ensure that the working environment is accessible and meets the needs of disabled individuals, taking into consideration particular needs as required.

We will ensure that we work with our partners to eliminate harassment of disabled individuals, support victims and take action against perpetrators.

We will ensure that information we provide is accessible to disabled employees. We will show a positive and enabling attitude to employees and job applicants with mental health conditions.

We will ensure that people who have experienced mental health conditions will not be discriminated against and that any disclosure of a mental health condition will assist and enable APM to provide the right level of support or adjustment.

We will provide non-judgemental and proactive support to individual staff who experience mental health conditions.

We will ensure all employees have information and training regarding disability and equality in the workplace

We will be fully compliant with our legal obligations as defined by the Equality Act 2010 and will also work alongside the guiding principles set by Disability Confident and the Mindful Employer. By doing so, we will be sharing best practice advice, guidance and resources to ensure that the organisation is continuously supporting its employees whilst also valuing them and their contribution to the business.

APM also have accreditation with the double tick award which ensures we are operating a best practice approach in this area. APM also work alongside the Access to Work and Fit for Work Schemes when required, should an employee require additional in-work support.

Definitions:

- S6 Equality Act 2010 defines a disabled person as someone with ‘A physical or mental impairment, which has a substantial and long term adverse effect on his or her ability to carry out normal day to day activities’. The definition is complex and it is important not to think too narrowly when considering whether a person is disabled or not. For example, people diagnosed with hidden disabilities such as epilepsy (even if their seizures are controlled, or they do not consider themselves to be ‘disabled’) and asthma or diabetes, if these have an effect on your day-to-day activities, developmental such as dyslexia and dyspraxia, learning difficulties and the progressive conditions such as motor neurone disease, forms of dementia and lupus (SLE). HIV infection, multiple sclerosis and cancer are also included within the definition and deemed to be a disability whether or not the condition has yet begun to have any effect on their ability to carry out day-to-day activities.
- Mental impairments covers a wide range of impairments relating to mental functioning, including learning disabilities and mental illness. However where an impairment concerns mental health, there is no longer a requirement to show that an impairment resulting from, or consisting of, a mental illness results from a clinically well-recognised illness, an individual need establish only that he or she has a mental impairment. Mental health conditions with long-term effect symptoms such as anxiety and depression, panic attacks, phobias; eating disorders; bipolar affective disorders; obsessive compulsive disorders; personality disorders; post-traumatic stress disorder, and some self-harming behaviour and mental illnesses, such as depression and schizophrenia.
- A person’s impairment amounts to a disability only if it affects their ability to carry out day to day activities.
- Staff who have a disability and consider that they may fall within the definition may wish to record this with APM and contact their HR Adviser.

Reasonable Adjustments:

- APM has a statutory duty to make reasonable adjustments and conduct health and safety risk assessments to avoid discrimination against disabled employees or prospective employees. Adjustments are a means of levelling the playing field to help disabled people contribute fully to the work force and enable that person to perform the job.
- Adjustments apply to all aspects and stages of employment and needs are always considered during: recruitment, selection, training and induction, transfers, promotion, opportunities for

training and career development, terms and conditions, employee benefits, retention, redundancy and dismissal.

- Types of adjustments will be discussed with the HR Adviser and, in conjunction with advice from a medical professional and other professional advisory bodies may include: alter premises, allow absences during working hours for rehabilitation assessment or treatment, supply additional training, acquire special equipment or modify existing equipment, modify instructions or reference manuals (this list is not exhaustive).

13. Race Equality

We will ensure that we work with all partners to eliminate racial harassment and racially motivated crime, support victims and take action against perpetrators.

APM will take steps to ensure that applications are attracted from all races and will ensure that there are equal opportunities in all stages of the recruitment process. Where appropriate, staff responsible for recruitment will receive training in equal opportunities, and guidance will be available to all staff. Promotion within the Company is based solely on merit.

APM have centres in many diverse areas of the United Kingdom and where ever possible we actively promote applications from clients from our local centres for jobs at APM.

Where we have catering facilities or events we will consider and aim to accommodate specific dietary requirements such as halal and vegetarian options for staff and clients.

14. Religion or Belief

APM welcomes all people regardless of their religions, philosophical beliefs and faiths and is strongly committed to promoting equality of opportunity in all its activities. Members of any religion, followers of any faith or belief and those without religious belief will be treated with equal dignity, respect and fairness.

APM is committed to protecting and promoting the rights of every member of the community to freedom of thought, conscience and religion, freedom of expression and freedom of association. These rights apply to people with or without formal religious affiliation, of all faiths and none, and provide for the principle of respecting other people's freedom to express their beliefs and convictions. However, any expression of belief has to take account of the rights and reasonable sensitivities of others.

Some religions require their followers to pray at specific times during the day. Staff may therefore request access to an appropriate quiet place to undertake their religious observance. Many religions or beliefs have special festival or spiritual observance days. An employee may request holiday in order to celebrate festivals or attend ceremonies. APM are sympathetic and will consider such a request where it is reasonable and practical for the employee to be away from work, and they have sufficient holiday entitlement in hand.

If it is practical and safe to do so, staff may welcome the opportunity to wear clothing consistent with their religion. Staff should contact their HR Adviser for guidance.

15. Age

Age discrimination in employment is unlawful. The UK legislation protects people of all ages in employment. Direct and indirect discrimination, victimisation and harassment are covered in all aspects of employment law including unfair dismissal and redundancy provisions.

APM recognises the contributions that people of all ages can bring, and welcomes and believes that all employees should, wherever possible, be permitted to continue working for as long as they wish to do so. Staff and managers can contact their HR Adviser for further information on the process.

16. Recruitment

The Company applies selection processes for both internal and external applicants which ensure the appointment of the highest quality staff.

As part of our commitment, APM will aim to:

- Ensure all appointments are fair and free from discrimination;
- Ensure that the operation of the Recruitment and Selection policy processes delivers fair and evidenced equality of treatment for all applicants.
- Improve retention rates as the right people are recruited for the right roles

The Company's selection criteria are designed to give applicants every opportunity to demonstrate their skills and abilities in a variety of relevant activities and to learn as much as they can about our Company and the role they are applying for. Activities may include: criteria based interviews, presentations and written exercises.

A person specification should link to the job description and outline the skills, experience and knowledge a person needs.

It is our policy to advertise vacancies in publications that are relevant to the nature and level of the job.

In line with our policy APM positively encourages applications from suitably qualified and eligible candidates regardless of sex, gender, race, disability, age, sexual orientation, or religion or belief, gender reassignment, maternity or because someone is married or in a civil partnership. At the interview or selection stage questions are asked, and where appropriate tests set, to check for the skills and competences needed for the post. Interviewers will not ask personal questions which may be perceived to be intrusive and imply potential discrimination. Where applicants volunteer personal information, those selecting will not to be influenced by such information.

The Company will take steps to ensure that applications are attracted from all sexes, races and from disabled people, and will ensure that there are equal opportunities in all stages of the recruitment process. Where appropriate, staff responsible for recruitment will receive training in equal opportunities and guidance will be available to all staff. Promotion within the Company is based solely on merit and without regard to race, sex, disability, sexual orientation, religion or belief

The HR & Organisational Development department will monitor recruitment and selection practices through the collection of equal opportunities monitoring data, which will be reviewed and used to inform improvements and changes in processes where required.

17. Disciplinary and Grievance Procedures

Acts of discrimination or harassment by employees of the Company may result in disciplinary action. The Company will treat seriously and consider resolutions when any employee has a grievance as a result of discrimination or harassment

It may be difficult for individuals experiencing discrimination or harassment to bring the matter formally into the open. Support and guidance will therefore be made available, in confidence, to people wishing to pursue this avenue through the HR Adviser without obligation to progress the

matter to a final end. Formal complaints may be made in writing initially to their HR Adviser. All investigations will be carried out in the strictest confidence and all people involved in the investigation will be expected to respect this confidentiality. Only once the facts have been established will a course of action be recommended. The HR & Organisational Development department will retain all information collated from investigations.

Should any person feel that an investigation has been managed in an inappropriate or unfair manner they may appeal to the HR & Training Manager.

Please refer to the Disciplinary and Grievance policies for further information.

18. Guidance to Staff and Managers

It is very important that any concerns relating to harassment and discrimination are identified and resolved as quickly as possible to avoid affecting employee morale, performance and attendance and to avoid impact upon APM's reputation.

Manager's role

If you are a line manager, you have particular responsibility to ensure that you are aware of any concerns and take steps to prevent harassment and discrimination from taking place.

These include:

- Setting a good example by your own behaviour and attitudes towards your staff and clients
- Making sure that staff know about APM's Equality and Diversity policy and that any kind of harassment or discrimination is not acceptable.
- Keeping a look out for changes in behaviour
- Challenging inappropriate behaviour, taking prompt action wherever there is evidence of bullying or harassing behaviour, whether or not anyone has complained.
- Ensuring office culture remains appropriate and in line with company values
- Always take issues seriously where required
- Investigate all allegations with consistency and an open mind
- Listen carefully without bias to what employees have to say
- Making sure that staff know they can approach you if they have a problem.
- Do not jump to premature conclusions about the validity of a particular complaint
- Always do a follow up after any issue or complaint to ensure that the matter has been properly resolved
- Discuss promptly to your HR Adviser any complaint of bullying or harassment
- Ensure you are familiar with all HR policies and procedures
- Ensure you lead your team by observing the APM Code of Conduct at all times

Employee's role

We all have a responsibility to help create and maintain a work environment which celebrates diversity and promotes equality. Staff can help do this by:

- Being aware of how your own behaviour may affect others and changing it, if necessary – you can still cause offence directly and indirectly even if you are ‘only joking’
- Treating your colleagues with dignity and respect
- Making it clear to others when you find their behaviour unacceptable unless it should be obvious in advance that this would be the case
- Taking steps to stop harassment or bullying and giving support
- Making it clear that you find harassment and bullying unacceptable
- Reporting equality and diversity issues and harassment or bullying to your manager or HR Adviser and supporting the Company in the investigation of complaints
- If a complaint relating to equality and diversity or harassment or bullying is made, not prejudging or victimising the complainant or alleged harasser.
- Staff who feel they require support and guidance should contact their line manager and HR Adviser

19. Monitor, Review and Measurement

This policy will be monitored by the Company to judge its effectiveness. In particular, the HR & Organisational Development department will monitor and annually review the composition of the workforce and of applicants for jobs in relation to:

- ethnic origin
- employees with a disability
- adjustments and support provided
- gender ratio of management team
- gender ratio of workforce
- average hours worked
- proportion of flexible working granted
- proportion of staff returning to work following a period of maternity leave
- average length of service, ethnic composition of disciplinary and grievances.

These metrics will be captured annually in order to benchmark against best sector companies, demographics and best practice standards.

Information will be gathered in a variety of ways and will be subject to review. Methods may include; employee opinion surveys, exit interviews and welcome surveys. The approach to equality and diversity will be reviewed in accordance with the results shown by the monitoring. Best practice and benchmarking tools are utilised to assess the progress and position of the company. The HR & Organisational Development department and Senior Management team will work to implement changes when identified and required.

APM will agree the aspirational targets for the workforce composition over a 3 year period which will form part of the Equality and Diversity action plan.

20. Further Information

For advice, information and copies of relevant external documents e.g. statutory codes of practice, useful websites include:

- ACAS <http://www.acas.org.uk>
- Age Positive (Department of Work and Pensions) <https://www.gov.uk/government/collections/age-positive> <http://www.agepositive.gov.uk>
- [Disability Confident Scheme](https://www.gov.uk/government/collections/disability-confident-campaign) <https://www.gov.uk/government/collections/disability-confident-campaign>
- [Disability Rights UK](http://www.disabilityrightsuk.org/) <http://www.disabilityrightsuk.org/>
- Equality Advisory and Support Service (EASS) <https://www.equalityadvisoryservice.com/>
- Equality and Human Rights Commission <https://www.equalityhumanrights.com/en>
- Fit for Work <http://fitforwork.org/>
- [Mindful Employer](http://www.mindfulemployer.net/) <http://www.mindfulemployer.net/>
- [Royal Association for Deaf People](http://www.royaldeaf.org.uk/) <http://www.royaldeaf.org.uk/>
- Stonewall <http://www.stonewall.org.uk>
- [Voice Ability](http://www.voiceability.org/) <http://www.voiceability.org/>

21. Related documents

For further information please refer to the following APM policies (this list is not exhaustive):

- Disciplinary & Grievance
- Work Life Balance
- Criminal Records Policy & associated safeguarding policies
- Bullying & Harassment
- Code of Conduct
- Recruitment & Selection

Version Information

Policy Title	Equality and Diversity Policy	
Policy Version Number	HVR-242	
Latest Version Date	3 rd April 2018	
Next Review Date	April 2019	
Owner	Human Resources	
Version History	Version Date	Change Request No.
	12/12/17	9007
	24/11/17	9079
	28/9/17	8984
	2/8/16	8339
	28/7/16	8288
	10/11/15	7931
	8/1/15	7316
	11/12/14	7281
	14/2/14	6644
	10/5/13	6101
	6/3/13	5999
	20/8/12	5578
	4/4/11	4584
	3/12/10	4409
	26/10/10	4345
	18/2/10	3761
18/12/9	3651	