

## **CFO Equality Policy 2015-2020**

### **Promoting Equality & Diversity Ideals within CFO Delivery**

#### **Purpose**

The purpose of an equality policy is to provide a statement which acts as a public commitment to promoting equality in line with the Public Sector Equality Duty (Equality Act 2010). The CFO Equality policy shall be a publically accessible document on the CFO website and be updated and released annually via the CFO Webpage. The policy will be annually reviewed to ensure equality remains a central aspect throughout the entirety of the CFO3 programme.

CFO are an agency of Her Majesty's Prison and Probation Service (HMPPS) and therefore the priorities detailed within the (formerly NOMS) 'Equality Strategy' underpin the CFO organisation and act as a driving force for employees and project implementation and delivery. The HMPPS policy and implementation plan is applicable for the staff working within CFO, however an additional policy is required to ensure equality and diversity ideals are a central aspect within the management of the CFO Prime Providers and their Sub-Contractors. The policy will help to ensure equality and diversity ideals are implemented during project delivery to CFO Participants, as well as publically promoting the importance of equality within the public sector organisation. The equality policy and implementation plan will largely contribute in providing a quality service to Participants.

For CFO, working with ex-offenders, a group in society generally experiencing multiple disadvantages and not accessing main stream services, ensuring equality and equal access for all is at the heart of its business. CFO recognises the need to embed its commitment to diversity in all activities including commissioning and contracting. Each CFO Provider is required to demonstrate how they will support equality and diversity during the programme. The CFO Engagement Manager will be responsible for gathering copies of Equality policies from each prime Provider and ensuring annual updates are completed, published and accessible. The CFO Engagement Manager will champion cross cutting themes throughout the CFO programme.

## **Equality Statement**

As CFO is a public sector organisation it has a duty to;

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity
- Foster good relations between persons who share a relevant protected characteristic and those who do not share it

The Public Sector Equality Duty (PSED) is a duty on public bodies and others carrying out public functions. It ensures that public bodies consider the needs of individuals in their day-to-day work – when developing policy, delivering services, and making changes that affect their employees.

## **Scope**

The CFO Equality and Diversity policy applies to prime Providers, sub-contractors and CFO employees. Equality and Diversity ideals are the responsibility of all partners and each should demonstrate a continued commitment throughout the CFO3 programme. Participant's engaging with the CFO3 programme shall be educated on the importance of equality and diversity and encouraged to display positive behaviour.

## **Legislation**

CFO strive to adhere to all relevant UK legislation, this policy is derived from the principles within the following documents:

- The Equality Act 2010
- Rehabilitation of Offenders Act 1974
- The Human Rights Act 1998
- Codes of practice issued by Equality & Human Rights Commission
- The MOJ Inclusion Diversity Strategy 2017-2020
- Civil Service Equality & Diversity Policy 2017
- The National Offender Management System: Equality Strategy 2015-2017



### **Roles & Responsibilities - CFO as a Managing Authority**

Equality for CFO Providers will include:

- The CFO3 contracts include a clause (15.1) stating 'each prime Provider will comply with the Equality Act (2010)', Providers will be required to evidence Equality Policies and demonstrate an ongoing commitment to Equality throughout the CFO programme. Providers will also be expected to contribute to the HMPPS CFO Implementation plan to evidence how each aspect will be put into practice.
- It is referenced in Schedule G (within the contract) the importance of the Equality Act (2010) and how 'The Provider shall be expected to deliver services that are sensitive to the specific requirements of each of the above groups (BAME, older prisoners, women, etc.)'. Prime Providers will be required to evidence how the organisation addresses protected characteristics and strive to ensure equality is implemented throughout project delivery.
- The CFO Engagement Manager will request annual policy updates to reflect any changes/development within the prime organisations.
- Providers shall be expected to evidence how internal staff are trained to understand and implement equality and diversity within working practices and behaviours.
- Providers will be expected to evidence a commitment to anti-bullying and anti-harassment campaigns for internal staff.
- Providers will hold central copies of all Sub-Contractors equality policies and produce upon request (Sub-Contractor matrix attached to policy).
- Monthly CFO Provider statistics will monitor how many participants engaged with the programme and whether Providers achieved targets for the hard-to-help groups, which reflect protected characteristics (men, women, disabled, age category etc.). Prime Providers are expected to meet monthly CFO targets & the CFO will address any under performance and under-representation of protected characteristics.
- All Providers shall monitor internal staff characteristics and address under representation of protected characteristics.
- Providers will provide evidence of how accessibility for participants with disabilities will be taken into account in the project.
- Providers are required to evidence how older offenders (50+) are encouraged to take engage with the programme and detail any specialist provision.
- Providers will evidence how women are encouraged to take part in the programme and how delivery is gender specific.
- The equality policy shall be included on all prime Providers websites and staff, participants and stakeholders shall be encouraged to access.
- Providers will evidence ways in which delivery assess' participants needs and can be adapted to the individual (marketing material, learning difficulties, language barriers etc.)
- Providers will encourage participants to develop a further understanding of equality and diversity ideals and apply learned behaviours within the community.



***CFO as an employer*** - Equality within the workplace for internal CFO staff will include:

- Staff responsible for creating job descriptions and person specifications will include aspects of equality & diversity policies and be aware of discrimination and diversity within recruitment processes. All Job Descriptions are graded and approved by the 'Job Evaluation Team' to ensure consistency, remove bias and include all relevant sections (including equality & diversity).
- All employees will be recruited via open and fair competition & disabled applicants will be offered the guaranteed interview scheme.
- Suitable adjustments will be available for disabled staff members where required
- Protected characteristics and under-representation will be monitored and addressed centrally by MOJ Shared Services.
- Line managers will ensure staff complete mandatory 'equality and diversity essentials' training on Civil Service Learning portal and training is completed on an annual basis.
- New employees will be informed of HMPPS & CFO Equality Policies on their first day and the policy shall be referenced in the employees induction pack. Staff will be encouraged to familiarise themselves with the policies and understand the principles of equality and diversity within the workplace.
- New and existing staff will be informed of policies applicable to working for HMPPS CFO (flexible work/life balance, grievance procedures, occupational health and safety, pay/pensions/benefits and counselling support) and shown how to access 'My Services' on the intranet to access more information. This will be referenced in the staff induction and staff handbook.
- Existing staff members will receive a 'Staff Information Pack' once a year which details information & policies relevant to CFO (office information, health & safety, HR & IT information). The equality policy shall be referenced within the 'staff information pack' and any relevant updates shall be included.
- The CFO will actively challenge any concerns regarding bullying, harassment, or victimisation and ensure all concerns develop through the appropriate HR channels. The relevant policy can be found on My Services for staff to raise a grievance and is also referenced in the staff handbook).
- All SPDR reviews and markings will be discussed by SMT to ensure markings are fair and free from any indirect or direct discrimination.
- Staff members are encouraged to complete 'personal development' courses on CSL and discuss career progression within their SPDR's. Personal development will be discussed within employees SPDR's and an action plan will be created.
- All staff are required to complete the mandatory 'Annual Civil Service Survey' which includes questions with an equality and diversity theme, results will be analysed by SMT and an action plan put in place to address low scoring questions/problematic areas.
- The Equality policy will be promoted to all staff members and prime Providers via a CFO bulletin, annual staff Information Pack and uploading onto the CFO website.
- All staff to behave in an appropriate manner and raise any related concerns with their line manager.

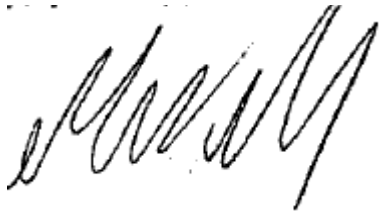


### Review

The CFO Engagement Manager will be responsible for the creation and management of this document and will act as an Equality champion. The final version of the document will be reviewed by the Operational Performance Managers, HR Manager and the Senior Management Team and any improvements or amendments shall be included. An annual review shall be scheduled to make any necessary amendments and policy updates.

The policy and implementation plan shall be disseminated to all internal CFO staff and prime Providers upon completion and uploaded onto the CFO3 website.

The policy is endorsed by the head of HMPPS CFO, Mark Nickson and will be reviewed on an annual basis.



Mark Nickson

Head of CFO

16/10/2018



Version	Scheduled Date for Review	Reviewed by;	Summary of Changes
Version 1.0	11.04.2016	Kate North	<ol style="list-style-type: none"> <li>1. Change from NOMS to HMPPS (please note the official NOMS equality strategy remains as NOMS as opposed to HMPPS )</li> <li>2. Review of equality documentation to ensure any policy changes are updated.</li> </ol>
Version 1.1	05.05.2017	Kate Dugdale	<ol style="list-style-type: none"> <li>1. Policy endorsed by Head of CFO</li> <li>2. All aspects of the implementation plan are assigned to relevant members of staff evidencing responsibility for each area of Equality</li> <li>3. CFO Engagement Manager named as an Equality Champion.</li> <li>4. Sub-Contractors policies to be gathered by Prime Providers in order for copies to be available upon request. Sub-Contractor list to be included as an attachment to the HMPPS Policy.</li> <li>5. Information added to ensure staff have equality objectives in personal appraisals.</li> <li>6. Added information regarding how participants will be informed of anti-harassment policy</li> <li>7. Annual updated policy reviewed by SMT &amp; Head of HMPPS CFO. Policy uploaded to CFO website and Providers informed.</li> </ol>
Version 1.2	15.10.2018	Kate Dugdale	Current issue