

EQUALITY, DIVERSITY & INCLUSION POLICY

August 2025

The Foundation believes that Equality, Diversity and Inclusion (EDI) are essential aspects of how we fulfil our purpose. We believe that through having diversity of people involved in the Foundation we benefit from more creative thought, strengthened insight and improved problem solving which supports us to deliver greater impact with our community. We want to ensure everyone regardless of their background and characteristics should be able to access opportunities to fulfil their potential. As a funder, inequalities are at the root cause of many of the issues our community face and much of the support we provide to fulfil our charitable objectives. By embedding EDI across our funder activity, we will be able to deliver greater impact against our charitable objectives.

We are committed to fairness and inclusion for everyone, maintaining an inclusive culture, and building a positive productive working environment, free from any form of discrimination. We are an equal opportunities employer and are committed to treating all individuals, including job applicants equally regardless of cultural, socioeconomic or cognitive background.

We are taking a holistic approach to EDI covering our role as an employer, as a service provider, as a purchaser of services and as a funder. This includes our governance and volunteers. We recognise that this policy is a work in progress, and we will continue to develop and improve it, learning from experience and through our wider engagement. [Comment: Enhance commitment to digital, language, and cultural accessibility in service delivery.]

1) What is the purpose of this policy?

The Foundation has created this Equality, Diversity & Inclusion Policy to help create an environment in which all individuals respect the rights of everyone and where colleagues treat each other fairly and with the utmost respect. Here at the Foundation, we will ensure that everyone can make the best use of their skills free from discrimination or harassment. Any behaviour that undermines this is unacceptable and will not be tolerated.

This policy provides a framework within which everyone at the Foundation can work in order to promote diversity, inclusion and equal opportunities for all employees and job applicants regardless of age, disability, gender, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (the **Protected Characteristics -see 4) Understanding key terms**).

2) Does this policy apply to you?

This policy applies to all our employees and prospective employees, consultants, contractors, volunteers including Trustees and Governors, interns/work experience students, casual workers and agency workers. The principles of anti-discrimination also apply to the way in which other individuals (including visitors, clients, customers, tenants and suppliers) are treated. This policy applies to all aspects of employment including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

3) Who is responsible for this policy?

The Chief Executive has ultimate responsibility for this policy. Along with the rest of the Leadership Team, we recognise the importance of our role as leaders in championing and modelling positive behaviour and acting.

The HR Business Partner has responsibility for the effective operation of this policy in employment terms and for ensuring compliance with the law.

Our EDI Allies play an important role in helping us to develop, monitor and evaluate this policy and related guidance and practice.

Managers have a specific responsibility to ensure the fair implementation and consistent application of this policy. They must champion and implement this policy and ensure that all our people understand the standards of behaviour expected of them and act when behaviour falls below its requirements.

Everyone at the Foundation has a duty to act in accordance with this policy and treat those around them consistently and fairly, with dignity at all times, and not to discriminate against, harass or victimise others regardless of their cultural, socioeconomic or cognitive background. The Foundation will ensure all our people have access to training and support to enable them to do this.

4) Understanding key terms

The Equality Act 2010 (**EqA 2010**) protects individuals from prejudice on the grounds of one or more of the Protected Characteristics. We have compiled an explanation of the key terms and associated rights below.

Age: people of all ages are protected from discrimination on the grounds of their age under the **EqA 2010**, whether the discrimination is based on their youth and inexperience or older age.

Disability: a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. There is a duty on employers to make reasonable adjustments to assist in overcoming any barriers of the impairment. Individuals are also protected from discrimination arising from something connected with their disability where it could be reasonably expected that the employer would know that the person has a disability. It is unlawful in most circumstances to request information about the health of job candidates prior to making a job offer. Employees who are disabled or become disabled are encouraged to inform the HR Team so that we can assess how best to provide support.

Gender reassignment: Transgender people who propose to, start or complete a process to change their gender regardless of whether this involves medical procedures are protected under the **EqA 2010**. An employee who is absent due to such procedures cannot be treated less favourably than if the absence was due to sickness, injury or some other reason. For more information on LHF's commitment to support people through any such process, please see our Trans Inclusion Policy.

Marriage or civil partnership: the **EqA 2010** protects employees who are married or in civil partnerships from discrimination on account of this status. The status of being single is not specifically protected under law.

Pregnancy and maternity: employees and job applicants are protected against discrimination on the grounds of pregnancy and maternity during the period of pregnancy and any statutory maternity leave. Please see our Maternity Policy for more information on rights associated with pregnancy and maternity.

Race: individuals are protected against discrimination on the grounds of colour, nationality and ethnic or national origins.

Religion or belief: individuals are protected against discrimination on the grounds of their religion or lack of religion, and belief or lack of belief. A religion can be any faith that has a clear structure and belief system. A belief can be a religious or philosophical belief that affects a substantial aspect of human life and behaviour. Political beliefs are not protected.

Gender: protects anyone against discrimination on the grounds of their gender. The **EqA 2010** implements the principle of equal treatment for different genders as regards access to employment, vocational training and promotion, and working conditions.

Sexual orientation: the **EqA 2010** protects people of all sexual orientations towards persons of the same sex, persons of the opposite sex and persons of either sex. It therefore includes bisexual, gay, heterosexual, lesbian, queer and questioning people.

In addition, the following forms of discrimination are prohibited under this policy and are unlawful:

Direct discrimination	Direct discrimination means treating someone less favourably because of one or more Protected Characteristic (set out above). For example, if someone is not offered a promotion because they're a woman and the job goes to a less qualified man this would be direct discrimination.
Indirect discrimination	Indirect discrimination is a provision, criterion or practice that applies to everyone but adversely affects people with a Protected Characteristic more than others and is not justified. For example, if a job advert for a salesperson says applicants must have spent 10 years working in retail, the business could be discriminating indirectly based on age. This is because the advert excludes young people who may still have the skills and qualifications needed. Some acts of direct or indirect discrimination can be justified if it is 'a proportionate means of achieving a legitimate aim'.
Harassment	This includes sexual harassment and other unwanted conduct related to a Protected Characteristic , which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
Victimisation	This means treating someone less favourably because they have asserted their right not to be discriminated against, or not to be bullied or harassed, or their right to blow the whistle on suspected wrongdoing. For example, if an individual has complained or supported another in complaining about discrimination or harassment and are not considered for promotion as a result, this would be victimisation.
Disability discrimination	This includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate barriers caused by a disability.

5) How does the Foundation promote equality, diversity and inclusion?

Everyone at the Foundation has a specific duty to act in accordance with this policy and treat colleagues and every person who they encounter respect, fairness and consistency at all times, including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events and work-related virtual events.

5.1 As a purchaser of goods and services

The Foundation purchases a significant range of goods and services. Our staff and service users must be assured that they will not be discriminated against in carrying out their roles by any of our contractors or suppliers. We recognise we can raise awareness of EDI and influence the behaviour of our suppliers by asking them to demonstrate to us their commitment and action on EDI. However, we do not wish to impose additional compliance burdens on the many small and local businesses we trade with who may not have the resources or skills to have comprehensive EDI policies and action plans in place. We will therefore develop this policy and guidance further to ensure that our aspirations and requirements are proportionate to the organisations and the value of services that we are purchasing. In practice this will mean we will have additional EDI requirements for our larger procured contracts and services.

5.2 As a funder and commissioner

The Foundation partly fulfils its charitable objectives through commissioning and funding organisations to deliver services and activities. Much of our funding is used to tackle inequalities whether they are health inequalities, poverty or service access issues amongst many others. We want to ensure that these organisations have a demonstrable commitment to EDI both in terms of employment as well as in ensuring access to services. This commitment will need to be reflected in their service monitoring and outcome reports to the Foundation.

Some of the services we fund may be specifically targeted at people with protected characteristics to overcome wider barriers to access and participation and are therefore not accessible for all. We will develop funding policy and guidance to ensure that our EDI objectives and requirements reflect this context and are relevant and proportionate to the organisations and the nature of services being funded.

5.3 As a service provider

The Foundation provides a wide range of services for the local community, and we recognise that we have a duty to ensure these services are accessible to all. We will ensure that EDI issues are addressed and as appropriate targeted in our service delivery and development plans. We will develop a model and commit to undertake equalities audits in each of our service areas that will include access and facilities as well as wider issues such as programming of activities and events and service policies.

5.4 How we communicate

We recognise that how we communicate both internally and externally influences people's perceptions of the Foundation and our commitment to EDI. This extends to the use of language and the images and photography we portray. We will ensure that we actively promote EDI through all our

communications activity. We will develop guidance and use appropriate audit tools and action plans to support us to do this.

6) How will the Foundation support equality, diversity and inclusion in its recruitment and promotion?

We will take all reasonable steps to ensure our application process is free of discrimination and that there are equal opportunities at all stages of the selection process. Job design and role requirements including qualifications, recruitment process, promotion and other selection exercises will be conducted based on merit, against objective criteria that avoid discrimination. Staff involved in recruitment will receive appropriate EDI recruitment training as well as being supported with practice guidance.

Job applicants will not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, we will not ask job applicants about their plans to start a family, and we will not ask about a job applicant's health or disability before a job offer is made, except in very limited circumstances allowed by law.

Training needs will be identified through regular appraisals. Staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made against objective criteria and based on merit. Where there are two candidates of equal merit, we will include consideration of EDI in our decision-making particularly where there are under-represented groups in this team/role.

7) How does the Foundation support disabled individuals?

We will take all reasonable steps to ensure we support staff or volunteers who are disabled or become disabled. We strongly encourage them to tell their manager and/or the HR Team about their condition so that we can support them. Managers and/or HR Team will identify and discuss any reasonable adjustments that will help overcome or minimise any barriers. Where appropriate, we may seek professional medical advice and assistance by referring them to Occupational Health so that we can understand how best to provide support and try to accommodate individual's needs and adjustments. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a significant disadvantage. Where necessary, we will take all reasonable steps to improve access.

8) Equality Impact Assessment – Strategy Leads

The Foundation is committed to promoting equality in all its activities. As part of this commitment, we will conduct Equality Impact Assessments on new policies and where significant changes are made to existing policies and practices. An Equality Impact Assessment (EIA) is a systematic and evidence-based process which verifies that our policies and practices are equality proof and not discriminatory.

All new or reviewed policies are required to go through this process to ensure that we are not discriminating against any group, to identify any gaps and to highlight areas of good practice where we are promoting equality of opportunity.

This EIA is not about political correctness – it is about ensuring that policies and practices at the Foundation are fair and inclusive in meeting the legitimate needs of the diverse groups that make up our community.

8.1 What evidence is required when conducting an EIA?

The EIA process is an evidence-based approach. How the evidence is obtained will vary and it is important to choose a method that is proportionate and appropriate. Examples include data gathering, consultation, research or anecdotal evidence.

8.2 Benefits of an EIA

The benefits of undertaking an EIA include:

- Enable us to identify and address issues that have an impact on the implementation of our EDI policy
- Recruiting and retaining the best staff: by completing EIAs for Recruitment, Selection, Promotions, Reward and Recognition Policies we will ensure that these policies support the recruitment and retention of the best people judged purely on their abilities and merit.
- Refuting ill-founded claims of discrimination: EIAs and the monitoring inherent in producing them are an evidence-based approach which helps counter claims where discrimination is alleged.
- Protecting the Foundation from vicarious liability: this is a legal term referring to instances when the employer is liable for the negligent actions of the employee, even though the employer was not directly responsible for discriminatory behaviour.

8.3 Support, Guidance & Responsibility

A collaborative approach is required to successfully conduct EIAs. Outlined below are the roles and responsibilities of those involved:

8.3.1 The HR Team will coordinate an EIA schedule for reviewing People Policies

8.3.2 The Chief Executive, HR and Strategy Leaders group will be responsible for developing and updating as appropriate the EIA guidance and process

8.3.4 The relevant policy owner will be responsible for conducting an EIA

8.3.5 The CEO has responsibility for overseeing the implementation of EIA on behalf of the Foundation.

8.4 How to conduct an Equality Impact Assessment

We will develop an EIA tool and guidance to ensure that EIA are carried out systematically and consistently.

9) How should you raise a concern in relation to a breach of this policy?

If you believe that you have suffered discrimination, you are encouraged to raise the matter as early as possible through our Grievance Resolution Procedure, with reference to our Anti-Harassment and Bullying Policy if appropriate. If you are subject to or witness discrimination in the workplace, you are encouraged to raise the matter with your manager and/or the HR Team, as appropriate. You may also wish to contact the EDI Allies for support and guidance. The information brought to our attention will be treated sensitively and with due respect for the privacy of any individuals

involved. There must be no victimisation or retaliation against anyone who complains about discrimination.

Making a false allegation of discrimination deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

10) How will the Foundation deal with breaches of this policy?

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Policy. Acts of discrimination may amount to gross misconduct resulting in dismissal.

11) Confidentiality and record keeping

Information about a complaint raised by you or a complaint against you may be placed on your employee file in accordance with our Grievance Resolution Procedure or Disciplinary Policy along with a record of the outcome and of any notes or other documents compiled during the process. We may process personal data and/or sensitive personal data relating to you and/or your employment with us. The terms ‘process’, ‘personal data’ and ‘sensitive personal data’ will have the meaning given to them under the Data Protection legislation (as explained in our Data Protection Policy).

12) Status, monitoring and review of this policy

This policy is non-contractual and may be subject to change from time to time.

Title of Policy:	Equality, Diversity & Inclusion Policy
Issue:	2.0 (2025 review)
Effective from:	January 2026
For review:	August 2027
Lead Officer:	Chief Executive Officer
Scope:	Employees Agency workers Officers Consultants Contractors Volunteers Interns / work experience students Casual workers