



EQUAL OPPORTUNITIES, EQUALITY AND DIVERSITY POLICY

1. General statement

- 1.1 Mind in Croydon is committed to achieving equal opportunities in employment and the services it provides. No user of Mind in Croydon's services, employee, trustee, volunteer (throughout this document, the term volunteer will include trustees) or job applicant should receive less favourable treatment based on the protected characteristics as outlined in the Equalities Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 1.2 As an employer and provider of a service to the community, Mind in Croydon accepts the responsibility to promote equal opportunities and challenge discrimination wherever it occurs. This document sets out the main consequences of this commitment and the action to be taken in order to achieve equal opportunities.
- 1.3 It is the responsibility of all staff, volunteers and service users to ensure that no other service user, volunteer, trustee or employee receives less favourable treatment than any other on the grounds stated in Para. 1.1 of this policy.
- 1.4 Mind in Croydon recognises that some clients and users of its services may, because of their past or present distress or illness, say or do things which would otherwise be unacceptable and incompatible with Mind's Equal Opportunities Policy. Mind will do all it can to challenge such behaviour. In cases where intervention is possible an approach will be adopted which aims to alter attitudes and behaviour while maintaining support for the distressed client. A record will be kept of such situations.
- 1.5 Mind in Croydon recognises its obligations under the Equality Act 2010 with regard to employment and the reasonable adjustments it must make to ensure that people with protected characteristics are not discriminated against in recruitment or in the workplace. Mind in Croydon keeps all its policies under review to ensure that they do not discriminate against people.

2. Responsibility

- 2.1 The Board of Mind in Croydon has overall responsibility for the effective operation of this policy. However, all employees, volunteers and service users have a duty as part of their involvement with Mind in Croydon to do everything they can to ensure that the policy works in practice.
- 2.2 Mind in Croydon will bring to the attention of all employees, job applicants, volunteers and service users the existence of this policy, and will provide such training as is necessary to ensure that the policy is effective and that everyone is aware of it. Reference to the policy should be included in

contract documents with outside agencies.

- 2.3 Those responsible for recruiting volunteers to work in Mind in Croydon projects are responsible for ensuring that they are aware of Mind's Equal Opportunities Policy and adhere to it while working as Mind volunteers.

3. Positive action

- 3.1 Mind in Croydon believes that passive support for equal opportunities is not enough and that positive steps, within the law, shall be taken. Mind in Croydon is committed to:
 - i) Recognising and developing potential which has not been used before because of past discrimination and disadvantage.
 - ii) Encouraging access and applications from under-represented groups.
- 3.2 Every effort will be made to ensure that the services offered by Mind in Croydon reflect the composition of the community it serves, and we will publish details of service user statistics by gender, age and ethnicity.

4. Dealing with complaints

- 4.1 If any service user, volunteer or employee feels that they have been, or are being discriminated against, in any way, they are entitled to pursue the matter with either:
 - i) Their line manager in the case of staff
 - ii) The equal opportunities officer
 - iii) The manager/key worker of the project where the alleged discrimination occurred.
- 4.2 All instances or complaints of discriminatory behaviour will be treated seriously.
- 4.3 Complaints or allegations of an unfounded or malicious nature will also be treated as serious and may involve using the disciplinary procedure.

5. Recruitment

- 5.1 In most circumstances, job vacancies will be advertised internally to encourage service users and volunteers to apply.
- 5.2 Mind in Croydon will ensure that job descriptions, person specifications and application forms reflect only the requirements of the job and do not imply sex or other stereotyping.
- 5.3 All advertisements will state that Mind in Croydon is seeking to be an effective equal opportunities employer. A copy of Mind in Croydon's Equal Opportunities Statement will form part of all application packs.
- 5.4 Mind in Croydon will take such positive steps, within the law, to redress imbalances in its work force.
- 5.5 Where Mind in Croydon proposes to use temporary staff, it will, where possible, employ people with mental health problems or other disabilities in the hope that they may then be found long-term jobs in Mind in Croydon.

- 5.6 Application packs/ads will make it clear that life experience as well as formal qualifications and work experience is valid.
- 5.7 In the interests of operating an effective Equal Opportunities Policy, Mind in Croydon will monitor certain information about job applicants. All such information will be treated as confidential and will be clearly separated from all processes concerned with the selection of staff.
- 5.8 Positive Disclosure and Barring (DBS) Disclosures and Recruitment of Ex-Offenders
- i) As an organisation using the Disclosure & Barring Service (DBS) to assess applicants' suitability for positions of trust, Mind in Croydon complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other information revealed. We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience. A DBS check is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a DBS check is required, application contain a statement that a DBS check will be requested in the event of the individual being offered the position.
 - ii) Where a DBS check is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent to a designated person within Mind in Croydon and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.
 - iii) We ensure that all those in Mind in Croydon who are involved in the recruitment process have been suitably trained in Equality and Diversity and can identify and assess the relevance and circumstances of offences. At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment. All applicants are made aware of this policy so that they know if they are subject of a DBS Check they are aware of the existence of the DBS Code of Practice and we will make a copy available on request. We undertake to discuss any matter revealed in a DBS check with the person seeking the position before withdrawing a conditional offer of employment.
 - iv) In the event of an individual becoming an employee of Mind in Croydon, any failure to disclose such convictions could result in dismissal. Any information given will be kept completely confidential in line with the Data Protection Act and will be processed fairly and lawfully and only disclosed in appropriate circumstances. The information we may hold on individuals will be accurate, relevant, kept securely and not held longer than is necessary.

- v) Having a criminal record will not necessarily bar individuals from working with us. This will depend on the nature of the position and the circumstances and background of any offences.

6. Training opportunities

- 6.1 Subject to the requirements of doing their job, employees will be encouraged to go on courses relevant to their present job or personal development.
- 6.2 Training courses will be non-residential and in working hours whenever possible.
- 6.3 It is the responsibility of every individual volunteer and staff member to complete mandatory equal opportunities training that is provided.

7. Working conditions

7.1 Pregnancy

Mind in Croydon recognises that pregnant women may need changes to their work conditions and will consider sympathetically any requests for such changes.

7.2 Antenatal Care

Time off with pay will be given to both full and part-time pregnant employees to attend antenatal classes, including medical checks and relaxation/childbirth classes. Similar provision will be made for partners sharing responsibility for childcare to attend antenatal classes where necessary.

7.3 Flexible Hours and Job Sharing

Working hours and arrangements will, whenever possible, be flexible for both full and part-time employees. Requests for job sharing or part-time working to meet employees' needs for shorter hours will be sympathetically considered, subject to operational requirements.

7.4 Accessible Buildings

Mind in Croydon will endeavour to ensure, as far as is practicable, that all its premises are fully accessible. When considering new premises, every effort will be made to ensure such premises are fully accessible.

8. Use of language

8.1 Staff, volunteers and service users will avoid and challenge the use of language which, in any way, belittles;

- i) disabled groups and/or individuals with special needs
- ii) any race, culture or religion
- iii) a person's sexual orientation
- iv) women and/or men/trans people
- v) a person's age

8.2 Where the language used has a personal impact on others, and it has been made clear to the person concerned that their use of such language is unwelcome and/or offensive, disciplinary action may be taken if they persist with it.

- 8.3 All materials used or developed by Mind in Croydon will be judged in the light of the promotion of equal opportunities, and those considered to be discriminatory will not be used.

9. Sexual harassment

- 9.1 No member of staff, volunteer or service user should be subject to sexual harassment.
- 9.2 This is interpreted as unwanted behaviour of a sexual nature including:
- i) verbal sexual abuse
 - ii) physical contact
 - iii) repeated remarks which an individual finds offensive
- 9.3 If it has been made clear to the person concerned that their behaviour is unwelcome and they persist with it, then the service user, volunteer or employee who is the recipient of the behaviour will be entitled to make a formal complaint.

10. Equal opportunities officer/monitoring of policy

- 10.1 The reason for having an Equal Opportunities Officer is to advise, inform and consult with management, staff and service users in order to progress and improve equal opportunities within Mind in Croydon.
- 10.2 The person appointed to this role should be committed to progressing equal opportunities within Mind in Croydon in a positive manner.
- 10.3 The Equal Opportunities Officer will:
- i) ***Monitor and report on Mind in Croydon's equal opportunities progress, development and practice and make an annual report to the Board of Mind in Croydon. This will be considered along with data relating to local demographics in Croydon and any gaps in Mind in Croydon's service provision to identified communities and issues arising from these reviews will be pursued and addressed with relevant Service Managers/Senior Managers.***
 - ii) Ensure staff, service users' and volunteers' awareness and understanding of equal opportunities issues and practice within Mind in Croydon via training and development.
 - iii) Advise and consult with Mind in Croydon's Board and Finance and Risk and General Purposes Committees on equal opportunities to recommend and discuss courses of action.
 - iv) Know or have access to appropriate information, legislation, policy, etc. for the purposes of carrying out their role.
 - v) Identify and advise on any Mind in Croydon equal opportunities training needs and provision.
- 10.4
- i) If the Equal Opportunities officer is a member of staff Mind in Croydon will allow adequate time off from their normal contracted duties to attend meetings and training events and perform this specific role. This time off will be negotiated with the Equal Opportunities Officer's line manager.
 - ii) If the Equal Opportunities Officer is a trustee Mind in Croydon will encourage and pay the necessary expenses for them to attend meetings and training courses relevant to the role.

- 10.5 It is not intended that the Equal Opportunities Officer should represent particular views, opinions or interests of individuals or groups, nor have the authority within this role to discipline either staff or service users or raise a grievance on behalf of a particular individual or group.
- 10.6 The Equal Opportunities Officer will be available in an advisory capacity in the case of a grievance involving equal opportunities issues.
- 10.7 Mind in Croydon has a Network on Employee Equality and Diversity – NEED. The NEED meets on a regular basis to exchange views, have open conversations and provide positive action on promoting diversity. Membership consists of employees and Trustees and is driven by employee action and suggestions for improvement.
- 10.8 The current Equal Opportunities Officer is:
Eula Kerr *who is contactable at:*
Mind in Croydon
26 Pampisford Road
Purley
Surrey CR8 2NE

11. Equality impact assessment

- 11.1 An equality impact assessment (EIA) is an evidence-based approach designed to help MIC ensure that policies, practices, events and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation. This covers both strategic and operational activities. MIC's work covers the range of functions, activities and decisions for example strategic decision-making, arranging strategy & funding, services, training courses and employment policies. The completion of an EIA will help to ensure that MIC understands the potential effects of the area of work by assessing the impacts on different groups both external and internal, any adverse impacts are identified, and actions identified to remove or mitigate them and decisions are transparent and based on evidence with clear reasoning.
- 11.2 The person/s doing the EIA should have a detailed understanding of the policy or practice being assessed and be in a position to ensure changes can be made when needed. The ownership and responsibility for EIA lies at Director of Service level, however, managers and staff play a key role in the assessment process as they will be involved in implementing the necessary actions identified and integrating equalities into planning. Completed EIA's will be submitted monthly to Senior Management Meetings and will form an agenda item at Board Meetings / FR&GP.
- 11.3 **Equality Impact assessment Template** can be found at **Appendix A** of this document. Guidance on completing an equality impact assessment can be found at **Appendix B: Equality Impact Assessment Guidance**.

Reviewed and Updated by the Board of Mind in Croydon – Nov 2023

Appendix A

Mind in Croydon - Equality Impact Assessment Template

Before carrying out an Equalities Impact Assessment (EqIA), you should familiarise yourself with the guidance notes (see Appendix).

An EqIA should be carried out whenever you are starting (and regularly reviewing) any major activity (e.g., a new strategy, programme, service or campaign).

A. Name and the nature of the programme/ activity

B. Reason for Equality Impact Assessment

Please delete as applicable:

- Proposed new programme/ activity
- Proposed change to an existing programme/ activity
- Undertaking a review of an existing programme/ activity
- Other (please state):

C. Person responsible for the programme/ activity

Name:

Job title:

Department:

D. equality and diversity considerations

Describe the ways in which the groups below may be impacted by your activity. The impact may be negative or positive. There are some example questions below to aid your thinking (delete any that are not relevant):

If you are unsure about how to find out about the needs of the groups noted below, you may wish to speak to someone from the Equality Improvement Team(equality@mind.org.uk) who can provide information, access to the equalities leaders steering.

- Age (e.g., are their ways older or younger people may find it difficult to engage in your project or process?)
- Disability (do you need to consider large print or easy read of any surveys /questionnaires?)
- Race (including ethnicity and nationality) (does your project take into account the needs of people from different groups, if not do you need to make any adjustments?)
- Religion or belief (do people from faith groups experience any specific disadvantage in relation to your research project)
- Sex
- Sexual orientation (is your language inclusive of LGB groups?)
- Trans and non-binary – is your language inclusive of trans and non-binary people?
- People experiencing multiple needs such as homelessness, mental health

- problems, being involved in the criminal justice system or substance misuse.
- Social deprivation- e.g., people who may be prohibited from attending your event due to the cost of travel
 - Pregnancy and maternity

E. Evidencing Impact

Please answer each of the following questions:

1. Is there any information available about the people who will be involved in or affected by your programme/ activity? (E.g., demographic info, scoping of need etc)
2. Are there any gaps in evidence/ insufficient information to properly assess the impact of your programme/ activity, and how will this be addressed? E.g., further research or working with a voluntary sector organisation?
3. Does your programme/ activity disproportionately affect any one group named above?
4. Will this programme/ activity lead to discrimination (direct or indirect), harassment, victimisation, or less favourable treatment of people with protected characteristics?
5. Does your programme/ activity contribute to advancing equality of opportunity?¹
6. Is there an opportunity for your programme/ activity to foster good relations between groups?
7. Do you need to make any reasonable adjustments to your programme/ activity to avoid discrimination or advance equality of opportunity? This may include adjusting interview questions, so they are more accessible or making changes to the way events are managed.
8. How is the programme/ activity's communication made accessible to all groups?
9. How are you engaging people with a wide range of protected characteristics in the development, review and/or monitoring of the programme/ activity?

F. EqIA Outcome

Select one of the four options below to indicate how the development or review of the programme/ activity will be progressed and state the rationale for the decision.

Option 1: No change required – the assessment is that the programme/ activity is/will be robust.

Option 2: Adjust the programme/ activity – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.

Option 3: Continue the programme/ activity despite the potential for adverse impact with mitigation in place.

Option 4: Stop the programme/ activity as there are adverse effects which cannot be prevented/mitigated.

G. Action and Monitoring

Please specify the actions required to implement the findings of this EqIA and how the programme/ activity's equality impact will be monitored in the future. It may be helpful to complete the table.

Activity in each quarter				What steps will you take to measure this activity is taking place	What will successful completion look like?	Date of completion? Please note this by quarters			
Q1	Q2	Q3	Q4			Q1	Q2	Q3	Q4

H. Review

Date of next review:

H. Sign-off

EqIA undertaken by (name and job title):

Date:

Appendix B

Equality Impact Assessment Guidance

Introduction

This guidance is intended to help you undertake an Equality Impact Assessment (EqIA). An EqIA should be carried out whenever you are starting (and regularly reviewing) any major activity (e.g., a new strategy, programme, or campaign). For the purposes of this template, this is summarised as your 'programme/ activity'.

EqIA is part of the Mind's general equality duty under the Equality Act 2010. The Equality Act 2010 specifies the following 'protected characteristics': age, disability, race (including ethnicity and nationality), religion or belief, sex, sexual orientation, gender reassignment, pregnancy and maternity, and marriage or civil partnership.

Mind has a general equality duty to have due regard to the needs to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between people who share a relevant protected characteristic and people who do not share it.

This guidance is designed to lead you through the EqIA process through asking pertinent questions and giving examples. The law does not dictate a particular form for EqIA, but we have provided a template for you use if required. The requirement is to actively consider how a programme/ activity will meet the general equality duty and take any necessary action. Wherever practicable, EqIA should be built into standard processes and tailored to the nature of the policies or practices involved.

Answers should be recorded in the EqIA form and can be expanded and supplemented as required. Answers may be as long or short as is necessary and relevant, bearing in mind that the effort involved in EqIA should be proportionate to the relevance of the programme/ activity to equality.

Assessing for Equality Impact

Before assessing the programme/ activity, ensure that you have a clear understanding of the purpose of the programme/ activity, the context, the intended beneficiaries, and the results aimed for.

- Bear in mind that the extent of EqIA should be proportionate to the relevance of the programme/ activity to equality. It may not be practicable or necessary to answer every question or address every potential scenario.
- Focus mainly on aspects of the programme/ activity that are most relevant to the question, to ensure most attention is given to the most important areas.
- Relate answers to consideration of the available evidence and address any gaps or disparities revealed, where feasible without disproportionate effort. For new policies, assess potential impact.
- Describe any action identified to address any issues highlighted.
- Where there is potential for adverse impact, but the programme/ activity will still be applied, indicate the rationale for that decision.

Initial/partial EqIA: in some circumstances - particularly for new policies/practices – there may be limited information on which to base EqIA. In these cases, the EqIA should be

carried out to the extent possible and should identify arrangements for monitoring/ investigation of equality impact and for fuller EqIA in future.

Wholly positive impact: Some policies/practices may be viewed as having only positive equality impact. For these, consideration should still be given to ensure that no adverse impact is overlooked and to ensure that full advantage is taken of the positive impact, e.g., through effective communication. However, the effort involved in carrying out EqIA should not be excessive.

Undertaking an Equality Impact Assessment

Sections A, B, and C

Indicate the current status of the programme/ activity or the stage of development/review. Also note any general comments here regarding the relevance and significance of the programme/ activity to equality. Which aspects of the programme/ activity are particularly relevant (which should be the main focus for EqIA)? On what aspects of equality does the programme/ activity particularly impact?

Section D

Indicate which equality group/s is the programme/ activity relevant and why? Policies/practices applying to substantial groups of service users or staff will be relevant to all equality groups, which should be noted.

The protected characteristics under the Equality Act are:

- Age
- Disability
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership²

You must consider each of these protected characteristics. As part of this, consider diversity within, as well as between groups (e.g., different disabilities, different racial groups). Consider the implications of combinations of protected characteristics e.g., issues of relevance to women may vary once race, religion and age are taken into consideration. Also consider the impact on those with caring/family responsibilities (which tends to impact more on women).

Section E

1. What evidence is available about the needs of relevant equality groups? E.g., information/feedback from equality groups or other stakeholders, involvement or research with equality groups or individuals, equality monitoring data, service monitoring data, information for other similar policies/practices, staff surveys,

research reports, demographic information, audit, inspection or management reports and recommendations.

2. Where are the gaps in evidence? If there is insufficient information to properly assess the programme/ activity, how will this be addressed? If information cannot be gathered now, consider building monitoring into the plans for implementation/review of the programme/ activity. Note: the resources put into collecting evidence should be proportionate to the relevance of the programme/ activity to equality.
3. Is there evidence (or an expectation) of higher or lower uptake by any equality group(s)? If so, give details of the differences and the reasons for these (if known)? Is any equality group excluded from participating in or accessing the service or functions? If so, why? Does the programme/ activity create any barriers for any group? For example, because of the time when the service is delivered or because of restricted income.
4. Might the application of this programme/ activity lead to discrimination, harassment or victimisation? Might it result in less favourable treatment for particular equality groups or give rise to indirect discrimination?
5. Does the programme/ activity contribute to advancing equality of opportunity?³ Will it help to:
 - remove or minimise disadvantage?
 - meet the needs of different equality groups?
 - encourage increased participation of particular groups?
 - take account of disabled people's impairments?
6. Is there an opportunity in applying this programme/ activity to foster good relations between people in any protected group and those who are not?⁴ Will it help to tackle prejudice and/or promote understanding?
7. Are reasonable adjustments built in where they may be needed? Is there evidence (or an expectation) that people from different equality groups have different needs or experiences in relation to the programme/ activity? If so, what are they?
8. Is the communication of the programme/ activity accessible to all groups? Are you using channels that are accessible to everybody? How could you make sure that your messages reach the widest range of people?
9. How are relevant equality groups or communities involved in the development, review, and/or monitoring of the programme/ activity?

Section F

There is a legal obligation to take account of the results of the EqIA in the development of a new or revised programme/ activity. This requires considering taking action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and exploiting any potential for positive impact. Clearly any unlawful discrimination must be eliminated.

Having considered all of the sections of the EqIA form you must come to a conclusion about how the development/review of the programme/ activity should be progressed. The reasons for the outcome and option chosen should be noted:

- **Option 1:** No change required – the assessment is that the programme/ activity is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review.
- **Option 2:** Adjust the programme/ activity – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations. This may involve removing or changing the aspect of the programme/ activity that creates any negative or unwanted impact. It may also involve introducing additional measures to reduce or mitigate any potential negative impact.
- **Option 3:** Continue the programme/ activity – this means adopting/continuing with the programme/ activity despite the potential for adverse impact. Set out the rationale for this decision, including how the decision is compatible with our legal obligation. Where there is discrimination, but it is considered not to be unlawful – the objective justification must be recorded.
- **Option 4:** Stop the programme/ activity – if there would otherwise be unlawful discrimination or adverse effects that are not justified and cannot be prevented/mitigated.

Section G, H, and I

- Specify the actions required to implement the findings of this EqIA.
- State how the programme/ activity will be monitored in relation to its equality impact (or note where this is specified above).
- When will the programme/ activity next be reviewed?