



## **GREENER EALING'S**

### **EQUALITY AND DIVERSITY POLICY**

#### **INTRODUCTION**

Greener Ealing Ltd (GEL) is a Local Authority Trading Company which has been set up to deliver high-quality sustainable waste, recycling, street cleaning, grounds maintenance and associated services in a socially responsible and environmentally friendly way, on behalf of the London Borough of Ealing, its residents and other service users.

GEL recognises and values the diversity of all people and communities in the borough and in our workforce and is committed to meeting the needs of all our customers and our employees. For these reasons, our commitment to equality and diversity is central to the way we work to promoting an environment of respect, understanding and encouraging diversity and eliminating discrimination by providing equality of opportunities for all.

The objectives that GEL will be aiming to achieve:

- To ensure that unlawful discrimination, harassment and victimisation does not take place in its workforce.
- To advance equality of opportunity between people who share a protected characteristic and those who do not.
- To foster good relations between people who share a protected characteristic and those that do not.
- To ensure we have robust and accurate evidence base of equality information relating to our workforce
- To ensure equality related evidence is used to determine appropriate support for our customers where needed.

#### **PURPOSE**

The purpose of this Equality and Diversity Policy is to ensure that we have clearly outlined to our customers, employees and partners:

- What we understand by Equality and Diversity.
- The standards that GEL seeks to achieve.
- Mechanisms for demonstrating progress and achievements.
- Mechanisms for feedback, learning and involvement.

#### **VALUING DIVERSITY**

GEL believes that valuing diversity means actively recognising the strengths, talents and needs of every individual and the community in which we serve. This requires our nurturing the potential and maximising opportunities for all our employees and supporting our customers as appropriate as well as making our organisation accessible to all.



We respect everyone's right to be treated fairly and do not tolerate discrimination in any form. Respect for our residents and our colleagues is important to us. This means:

- Valuing people and diversity.
- Being open and communicating well.
- Working in partnership with others.
- Showing leadership and taking personal responsibility.
- Acting with integrity and honesty.
- Achieving excellent results in everything we do.
- Demonstrating GEL's values and behaviours.

### **THE LEGAL FRAMEWORK**

In formulating this Policy, GEL recognises and values the important role played by supporting legislation and associated Codes of Practice, in defining discrimination and mechanisms to prevent and stop inappropriate practices. GEL is committed to meeting its statutory responsibilities as determined by legislation (listed below) as presenting opportunities for realising its vision and values. The relevant legislation includes:

- The Human Rights Act 1998
- The Equality Act 2010

**The Equality Act 2010 encompasses** the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual Orientation

**Public Sector Equality Duty** (Section 149 of the Equality Act 2010) applies to public bodies and others carrying out public functions, which is applicable to GEL. It supports good decision making by ensuring public bodies consider how different people will be affected by their activities, helping them to deliver policies and services which are efficient and effective; accessible to all; and which meet different people's needs.

The Equality Duty is supported by specific duties which are applicable to GEL. The specific duties require GEL to:

- publish relevant, proportionate information demonstrating its compliance with the Equality Duty at least annually; and
- set itself and publish specific, measurable equality objectives, at least every four years.

Detailed guidance on how GEL will comply with the specific duties is included at Appendix A. The specific, measurable equality objectives were approved by the Board in February 2021 and are appended at Appendix B. These objectives are in addition to the general aims set out below.

## **EMPLOYMENT AND RECRUITMENT OF STAFF**

In general GEL aims to:

- Nurture and build a diverse and representative workforce, which at all levels broadly, represents the community it serves, enabling it to better meet the service needs of our customers.
- Treat all employees and applicants for employment fairly and ensure they are not discriminated against because of any protected characteristic or social background.
- Regularly review its recruitment and selection procedure to ensure fair access to all jobs. People will be selected on merit, based only on their skills, abilities, experience and qualifications to carry out the duties and responsibilities of the post for which they have applied.
- Be a 'Positive about Disability' employer and regularly review our commitment. Guarantee to interview any candidate with a disability who on the basis of their application appears able to meet the requirements of the job.
- Ensure that all employees are valued and treated with dignity and respect. Where harassment, victimisation or bullying is found in the workplace this will be confronted and dealt with through the Disciplinary Procedure.
- Provide fair access to training and development opportunities.
- Have due regard to equal pay legislation.
- Support employees who wish to use a mode of dress dictated by ethnic/cultural background and religious beliefs. However, where corporate clothing is used or provided or where the wearing of any apparel may conflict with health and safety regulations or this policy, GEL may impose restrictions.
- Consider and reasonably adapt organisational requirements or existing practices where they are contrary to employees' cultural and religious needs/or where these can be reasonably adjusted to meet the needs of employees with disability.
- Actions will include ensuring that a Workforce Strategy addresses specific areas for development around workforce equality outcomes and awareness.
- Provide a range of equality and diversity training and development to support staff deliver GEL's equality and diversity commitments.
- To ensure that equality and diversity matters are considered as part of any changes to current service delivery or the development of any new services all such reports must include a formal consideration of Equalities and Diversity implications.

## **EMPLOYEES' ROLE AND RESPONSIBILITIES**

The contribution of GEL's workforce is critical to achieving the aims of this policy:

- GEL's code of conduct sets out expected standards of behaviour for its workforce. Any deliberate act of discrimination or serious breach of the Equality & Diversity Policy by employees will be considered as an act of gross misconduct and may result in disciplinary action up to and including dismissal.
- Every employee has a responsibility to challenge and report inappropriate behaviour.
- Each employee is responsible for ensuring their actions and decisions comply with the requirements of equality legislation.
- Each employee must complete Equality and diversity training which forms a mandatory part of the GEL's induction programme.

### **Dignity at Work**

Every employee has the right to be treated with dignity whilst at work. GEL does not tolerate harassment or bullying. An employee who believes that their dignity at work has been breached has the right to make a complaint under GEL's Dignity at Work Policy. This includes the reporting of racist and gender related incidents. GEL takes such complaints seriously and will carry out an investigation.

### **SERVICE DELIVERY**

GEL provides direct services to customers and is committed to fair and equitable access to the service. GEL will ensure that its service is carried out in a way that complies with statutory requirements, minimises adverse impact on any section of the community and meets the needs of all local people (as appropriately as possible).

In general, GEL aims to:

- Ensure equal access, fair treatment and appropriate provision to its customers regardless of any protected characteristic, social background or any other reason not connected to entitlement and availability.
- Provide and publicise clear information on how dissatisfied customers can complain about the services they have received and respond efficiently to complaints received.
- Ensure that wherever practicable, all services and buildings are accessible.
- Respond to harassment claims in accordance with its Dignity at Work Policy.

### **MONITORING**

The Board will monitor progress against our agreed specific objectives at least twice per year and publish relevant, proportionate information demonstrating its compliance with the Equality Duty in its annual report.

As part of this monitoring we will review our workforce monitoring data to ensure it is as up to date and comprehensive as possible, by raising awareness through publicity to encourage all employees to make sure information recorded on our HR system is full and accurate.

This will be aided by:

- Monitoring Recruitment and Selection, training and other personnel procedures, and measuring change in the composition of the workforce. Collecting and analysing information to check that GEL's employment policies and practices are fair and prevent discrimination.
- Reporting the results of employment monitoring on an annual basis.

### **WHO HAS RESPONSIBILITY?**

- The Board is responsible for coordinating a strategic approach to the management of equality and diversity and will nominate a lead officer.
- The Managing Director is responsible for ensuring that this policy is carried out and that all equality and diversity issues are mainstreamed within the business plan and delivery of the services.
- Managers are responsible for ensuring that arrangements are in place to ensure effective day-to-day delivery of services and management of employees with due regard to GEL's equality and diversity objectives.
- All employees have a responsibility to carry out their duties in accordance with this Equality and Diversity Policy, related policies and statutory requirements.
- The Board will promote, support and uphold this policy in all their dealings with employees, partners and our external customers.

### **Related Policies**

The following policies are related to and should be read in conjunction with this policy:

- Dignity at Work Policy
- Code of Conduct
- Grievance Procedure
- Disciplinary Procedure
- Whistleblowing

### **Review**

All related policies, procedures and practices will be subject to review in order to assess their impact on achieving and contributing equality and diversity objectives.

## **APPENDIX A – How GEL will deliver the Specific Duties of the Public Sector Equality Duty**

Further guidance to public bodies on how to fulfil the Public Equality Duty, specific duties are available in the government guidance: Equalities Act 2019: Specific Duties to Support the Equality Duty What do I need to know? Quick start guide for Public Sector Organisations.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/85049/specific-duties.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/85049/specific-duties.pdf)

### **The Two Specific Duties**

#### **1. Publishing Information**

Public bodies subject to the specific duties must publish information to show their compliance with the Equality Duty. This means that the information they publish must show that they had due regard to the need to:

- **Eliminate unlawful discrimination**, harassment and victimisation and any other conduct prohibited by the Act;
- **Advance equality of opportunity** between people who share a protected characteristic and people who do not share it;
- **Foster good relations** between people who share a protected characteristic and people who do not share it.

Public bodies must publish information to show that they **consciously thought** about the above three aims of the Equality Duty as part of the process of decision-making.

The information published must include:

- Information relating to employees who share protected characteristics (for public bodies with 150 or more employees); and
- Information relating to people who are affected by the public body's policies and practices who share protected characteristics (for example, service users).

This information must be published at least **annually**. GEL will include appropriate information within its **Annual Report and Accounts** and information will be available clearly on the website.

It is up to each public body to decide for itself what information it publishes to show its compliance with the Equality Duty. This will vary greatly, depending on the size of the body; the range of functions it performs; and the extent to which those functions could affect equality.

***Information about employees:***

The Equality Duty requires public bodies to consider how their activities as employers affect people who share different protected characteristics. The specific duties require public bodies with 150 or more employees to publish information to show they did this.

This could include information they considered relating to:

- the make-up of the overall workforce;
- the gender pay gap and pay equality issues more generally for the public body;
- recruitment and retention rates for staff with different protected characteristics;
- applications for flexible working and their outcomes for different protected characteristics;
- applications for learning and development opportunities and their outcomes for staff with different protected characteristics;
- grievances and disciplinary issues for staff with different protected characteristics.

Published information could also include details of policies and programmes that have been put in place to address equality concerns within the workforce, and information from staff surveys.

*NB The specific duties do not require public bodies to ask every member of staff about such issues as their age, sexual orientation, or religious beliefs. It will be for individual public bodies to decide whether such information is necessary for them to demonstrate their compliance with the Equality Duty.*

#### ***Information about policies and services:***

The Equality Duty requires public bodies to consider how the decisions that they make, and the services they deliver, affect people who share different protected characteristics. The specific duties require public bodies to publish information to show they did this.

This could include information they considered relating to:

- the number of people with different protected characteristics who access and use services in different ways;
- customer satisfaction levels and informal feedback from service users with different protected characteristics and results of consultations;
- complaints about discrimination and complaints from people with different protected characteristics;
- service outcomes for people with different protected characteristics.

Published information could also include details of policies and programmes that have been put in place to address equality concerns in service delivery.

*NB The specific duties do not require public bodies to ask service users about such issues as their age, sexual orientation, or religious beliefs. They should never do this if such information is available from other sources*

#### ***Publishing the Information***

The information will need to show that the public body has properly considered how its activities – both as an employer and a service provider – affect people with different protected characteristics. It may include details of any analysis the public body has done on the equality information it holds – such as when it was considering a new policy or programme.

## **2. Setting Equalities Objectives**

The specific duties require public bodies to prepare and publish one or more specific and measurable equality objectives which will help them to further the three aims of the Equality Duty. All public bodies subject to the specific duties must publish objectives at least **every four years**.

It is for each public body to decide what equality objectives it should set and how many there should be. Objectives which are **stretching**, and focus on the biggest equality challenges facing the public body, will have the greatest impact in furthering the aims of the Equality Duty.

When deciding what equality objectives to set, a public body should take into account evidence of equality issues across all its functions; consider issues affecting people sharing each of the protected characteristics; and think about each of the three aims of the Equality Duty.

The number of objectives set should be proportionate to the public body's size; the extent to which its functions affect equality; and the evidence that such objectives are needed. A large government department may decide to set a number of objectives; a small rural school may decide to set only one or two.

In setting its objectives, a public body may find it helpful to think about:

- What evidence it could use to inform the objectives, from both internal and external sources;
- What types of equality issues are raised by its staff and customers;
- Where the evidence indicates that equality performance is poor;
- What objectives could be set to stretch the organisation to perform better on equality issues in key areas;
- Whether there is scope to bench mark equality information and objectives against similar public bodies;
- The people and organisations it would be useful to talk to in the process of setting objectives;
- Whether to set short term, medium term or long term objectives in different areas;
- How progress against the objectives will be measured.

***GEL's agreed Objectives are appended at Appendix B.***

### **3. Accessibility of Information and Objectives**

Public bodies must ensure that the information they publish and the equality objectives they set are accessible to the public, free of charge. In addition to publishing them electronically on their website, they should consider making them available in other formats. They should also consider whether the information is provided in a way which makes it easy for the public to understand and use, to enable public accountability.

**APPENDIX B –  
Specific, measurable quality objectives**

Approved by Board February 2021:

i. To get an accurate base line of equalities information

We will work with supervisors and employees to get accurate base line information on our workforce profile, which is crucial to achieving our equalities objectives 2 and 3.

ii. To increase the numbers of female HGV drivers employed on the contract.

iii. To increase the numbers of females generally across the workforce.