



# Diversity, Equality and Inclusion Policy

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## 1 Scope of Policy

This policy applies to anyone working for us. MannionDaniels is committed to eliminating unlawful discrimination, and to encouraging diversity amongst our workforce. Our aim on inclusion is that each employee feels respected and comfortable in themselves in the workplace. We believe that this creates a more productive environment where everyone can give their best at work and thrive.

This policy outlines our commitment throughout the employment lifecycle to diversity, equality and inclusion and sets out how MannionDaniels' puts this commitment into practice.

## 2 Purpose

We believe that a culture of equality, diversity and inclusion not only benefits our organization, but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

The purpose of this policy is to provide equality, inclusion and fairness for all in our employment. When we're making decisions, the [Equality Act 2010](#) gives us a duty to take into account the need to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between different parts of the community

MannionDaniels is committed to promoting a working environment based on dignity, trust and respect and one that is free from discrimination, harassment, bullying or victimization.

We ensure that our recruitment, promotion and retention procedures do not treat people less favourably because of their:

- disability;
- gender, gender identity or gender reassignment status;
- marital status;
- race, racial group, ethnic or national origin, or nationality;
- religion or belief
- sexual orientation;
- age;
- civil partnership status;
- pregnancy or maternity;
- paternity;
- part-time status; or
- fixed-term status .

Our aims are to

- create an environment in which individual differences and the contributions of all our staff are recognised and valued
- ensure every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated
- make staffing decisions based on merit alone
- provide training, development and progression opportunities to all staff
- promote good management practice through our business code of ethics and review all our employment practices and procedures regularly to ensure fairness and to take account

of changes in the law

- ensure our working practices comply with the Equalities Act 2010.

### 3 General Principles

All MannionDaniels employees will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

We also recognise that in the field of international development and specifically grant-making, there are inherently unequal power relations. We strive to keep staff aware to these unequal power relations and to not perpetuate them, instead promoting more inclusion and supportive environments for all to thrive. This includes staff reflecting on unconscious biases they may hold, and the external environment we find ourselves in within different circumstances. These reflections are part of the DEI and safeguarding trainings we do, and also part of internal discussions within MannionDaniels staff.

In order to adhere to our commitments, we will:

- make opportunities for training, development and progression available to all staff, who will be helped and encouraged to develop their full potential
- ensure all employees adhere to our code of ethics and support the company to provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination
- take all complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, or the public very seriously
- deal with any misconduct under the company grievance and/or disciplinary procedures and take appropriate action. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice
- carry out ad hoc monitoring to include information regarding the composition of our workforce, to assess how this policy is working in practice, and taking action to address any issues.

We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others. And the more areas of difference a person brings, the more this effect can be compounded. In this way, the experiences of a black woman with a disability may be very different to the experiences of a black woman without a disability and also very different from the experiences of a white woman. This way of looking at diversity and inclusion is known as "intersectionality".

We expect you to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues or third parties must be free from any form of discrimination, harassment, victimisation or bullying.

If anyone is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary procedure.

The Staff Handbook (available to all staff) outlines how grievances should be reported and dealt with by line managers. In the case of DEI-specific grievances, staff and all related parties can also approach the DEI Lead directly on: [safeguarding@mannondaniels.com](mailto:safeguarding@mannondaniels.com). Staff can also report anonymously through the whistleblowing site:

The DEI Lead commits to responding to the grievance within 24 hours, and conducting a thorough investigation of all grievances. All DEI cases will be reported and monitored.

## 4 Discrimination

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- Disability
- Sex
- Gender reassignment
- Marital or civil partnership status
- Race
- Religion or belief
- Sexual orientation
- Age, and
- Pregnancy or maternity

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception.

There are also two specific types of discrimination that apply only to disability: "discrimination arising from a disability" and "failing to make reasonable adjustments".

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interest and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- Steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals;
- Recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients; and
- Using different standards for different groups of employees to judge performance.

### Different types of discrimination under the Equality Act 2010

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities

could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.

- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
  - dismissing or failing to pay a bonus to someone because of their disability-related absence; or
  - disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.
- **Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:
  - allocating some of the disabled person's duties to a colleague;
  - changing their working hours or place of work;
  - adjusting procedures for assessing job candidates; and
  - modifying disciplinary and grievance procedures.

### Harassment and sexual harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

You should refer to our [Anti-harassment and anti-bullying policy](#) for further information on our procedure for reporting harassment.

### Victimisation

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

### Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see [Harassment](#)).

You should refer to our [Anti-harassment and anti-bullying policy](#) for further information on our procedure for reporting bullying.

### **Equality of opportunity**

#### **Recruitment**

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible.

Anyone making a decision about recruitment must not discriminate in any way and must have attended appropriate diversity and inclusion training.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.

#### **Career development**

Any decision you make relating to a person's promotion or career development must be free from discrimination.

We ensure that selection criteria and processes for recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact on a certain group.

#### **Disability inclusion**

##### **Recruiting people with a disability**

The recruitment team will consider disability in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible.

We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process.

If you are involved in the interview process, you must not ask job applicants about their health or disability except with prior approval from the HR Manager. Such approval is given only in exceptional circumstances and where there are specific legal grounds for doing so.

##### **Talking about disability**

We understand that some people find it hard to discuss their disabilities and that disability can be invisible.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

We do not tolerate ableist language in our organisation. Ableist language is language that is negative, inappropriate or offensive towards people with a disability and may take the form of jokes or "banter". If you adopt such language, we will take action against you including (for those to whom it applies) under our [Disciplinary procedure](#).

## **Reasonable adjustments**

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please inform your line manager or a member of the HR team to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and your medical adviser to help us get the right support in place.

## **Support**

If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, please contact our employee assistance programme for free, confidential advice. To access this, please go to your Perkbox account and enter EAP in the search box.

## **Training**

If you are involved with making decisions about a person's employment, you must attend appropriate equality, diversity and inclusion training.

All new starters must attend equality, diversity and inclusion training as part of their onboarding programme.

Every current employee must complete regular equality, diversity and inclusion training on at least an annual basis via our online learning platform.

## **5 Review of policy**

This policy will be reviewed by the HR Manager and DEI Lead on an annual basis or sooner if significant changes in legislation occur owing to the review of related procedures and policies. All employees will be notified of any revisions to policy.

## **6 Policy implementation**

The DEI policy is fully endorsed and supported by MannionDaniels' Leadership. They, and specifically the DEI Lead Rolla Khadduri, are responsible for handling and reporting any grievances, and that all staff are fully inducted and trained on the contents of the policy. The Leadership team regularly reviews relevant DEI metrics and a DEI register, with the aim of responding to any grievances and also maintaining and growing our inclusion culture and valuing diversity.

All staff should understand that they, as well as the company, can be held individually liable for acts of bullying, harassment, victimization and unlawful discrimination, during the course of their employment, against fellow employees, customers, suppliers and the public.

The DEI policy should be read in conjunction with other policies, including: Business Code of Ethics; Modern Slavery Policy; Safeguarding Policy. These policies define our expectations as an organisation of professional code of conduct and how we protection against bullying, harassment and exploitation.