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Policy Author (s)	People Team
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Policy Amendment History

Version No.	Date	Amendment Details	Approved By
1	NOV 2019	Initial Version	JD
2	MAY 2023	Revised	Union & ExCo
3	APRIL 2026	Added references to new legislation and updated accountabilities.	People Team and Union

Document Data Classification Internal Use

Document Audience

This policy applies to all employees of UKCEH on permanent, fixed and short-term contracts as well as individuals who are on secondment to UKCEH, and non-employees such as students, fellows, visitors, contractors and other persons carrying out work on UKCEH premises and/or on behalf of UKCEH.

This document reflects UKCEH's commitment to EEDI by ensuring that all Policies, Procedures, and SOPs are reviewed and considered for their impact on the nine protected characteristics. Consistent third-person terminology is used throughout.

1. Purpose

- 1.1 At UKCEH, it is important that everyone feels supported and can contribute meaningfully to the organisation's culture, to achieve the organisation's EEDI goals and aspirations.
- 1.2 This policy establishes an effective, accountable, and transparent framework for embedding EEDI best practices into every part of UKCEH. This policy:
 - Outlines the organisation's commitment to EEDI throughout the employment lifecycle and sets out how UKCEH puts this commitment into practice.
 - Explains the behaviour the organisation expects of all employees and students in support of this commitment; and
 - Sets out the key steps UKCEH take to make the organisational culture as inclusive as possible, including the organisation diversity and inclusion framework and how UKCEH ensures the equality of opportunity throughout the employment lifecycle.

2. Scope

- 2.1 This policy applies to all employees of UKCEH on permanent, fixed and short-term contracts as well as individuals who are on secondment to UKCEH, and non-employees such as students, fellows, visitors, contractors and other persons carrying out work on UKCEH premises and/or on behalf of UKCEH.
- 2.2 This policy accompanies the Anti-Harassment & Bullying Policy and any other EEDI policies adopted by UKCEH, for example the Transgender Equality Policy and supporting guidance such as Supporting Neurodiversity in the Workplace guidance.
- 2.3 All policies or procedures should be reviewed through the Equality Impact Assessment process.

3. Policy Statement

EEDI Terminology

- 3.1 **Equality:** At its core, equality means fairness: ensuring that individuals, or groups of individuals, are not treated less favourably because of their protected characteristics. Equality also means equality of opportunity: ensuring that those who may be disadvantaged can get the tools they need to access the same, fair opportunities as their peers.
- 3.2 **Equity:** Equity recognises that each person has different circumstances and allocates the exact resources and opportunities needed to reach an equal outcome.

- 3.3 **Diversity:** Diversity is recognising, respecting and celebrating each other's differences. A diverse environment is one with a wide range of backgrounds and mindsets, which allows for an empowered culture of creativity and innovation.
- 3.4 **Inclusion:** Inclusion means creating an environment where everyone feels welcome and valued. An inclusive environment can only be created once individuals are more aware of their unconscious biases and have learned how to manage them.
- 3.5 **Intersectionality:** Intersectionality describes the combination and accumulation of unique experiences people can have due to identifying with more than one protected characteristic. The intersection of these characteristics could be where people encounter compounding forms of discrimination or prejudices.

EEDI Expectations of Engagement

- 3.6 UKCEH expects all employees to take personal responsibility for observing, upholding, promoting, and applying this policy.
- 3.7 UKCEH expects all colleagues to treat everyone (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust, and respect. This may mean allowing for different views and viewpoints and ensuring/creating space for others to contribute. Any dealings employees have with colleagues, or third parties must be free from any form of discrimination, harassment, victimisation, or bullying.
- 3.8 If any member of the organisation is found to have committed, authorised, or condoned an act of discrimination, harassment, victimisation, or bullying, UKCEH will take appropriate action against them, which may include disciplinary measures under the organisation Disciplinary Procedure where applicable. The organisation will also take corrective and or preventative actions such as providing additional training to support individuals in this area. Please be aware that employees can be held personally liable for acts of discrimination and harassment.

Discrimination

- 3.9 Discrimination is not always obvious and can be subtle and/or unconscious. This stems from a person's general assumptions about the abilities, interests 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.
- 3.10 The Equality Act of 2010 prohibits discrimination due to protected characteristics. The protected characteristics are disability, sex, gender reassignment, marriage or civil partnership, race, religion or belief, sexual orientation, age, pregnancy and maternity.

3.11 The Equality Act 2010 protects individuals from several forms of discrimination:

- **Direct Discrimination:** Treating someone less favourable because they possess a particular protected characteristic compared with someone who does not have that characteristic.
- **Indirect Discrimination:** Where a policy, procedure or way of working that applies to everyone puts people with a particular characteristic at a disadvantage compared with people who do not have that characteristic, unless there is good reason to justify it.
- **Discrimination by Association:** Treating someone less favourable because they are associated with someone who has a protected characteristic.
- **Discrimination by Perception:** Treating someone less favourably because they are perceived to have a protected characteristic even if they do not.

3.12 There are also two specific types of discrimination that apply only to disability: “discrimination arising from disability” and “failure 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.

Harassment and Sexual Harassment

3.13 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. Please refer to the Anti-Harassment and Bullying Policy for further information.

3.14 Sexual harassment is conduct of a sexual nature that has the same purpose or effect as outlined above in 3.12.

3.15 In accordance with the 2024 amendments to the Equality Act 2010 on Worker Protection, UKCEH is committed to proactively preventing sexual harassment by taking reasonable and robust measures to safeguard employees.

3.16 Employers are required to take reasonable steps to prevent sexual harassment, including the introduction of comprehensive training programs, clear reporting mechanisms, and regular updates to workplace policies.

3.17 Training modules and guidelines are available to support all employees, including managers and supervisors, to fully understand their responsibilities under the legislation and UKCEH broader workplace safety commitment.

- 3.18 UKCEH encourages all colleagues to actively participate in the training programmes provided and familiarise themselves with the updated guidelines to ensure compliance with the Worker Protection Act and contribute to maintaining a safe and respectful workplace.

Victimisation

- 3.19 Victimisation is when someone treats 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.

Equal Opportunities

Equality Impact

- 3.20 As an Equal Opportunities employer, UKCEH will consider the requirement for an equality impact assessment (EIA) when developing new policies or considering changes to existing ones. In this way UKCEH seeks to review how particular groups or individuals may be affected and will address implications in line with the assessment.
- 3.21 Equality Impact Assessments are centrally stored and often reviewed by the People team.

Recruitment

- 3.22 Steps taken to ensure an inclusive recruitment process include but are not limited to:
- gender decoding job adverts
 - inclusive language checks
 - advertisements on a range of platforms for broader engagement
 - balanced panels where possible
- 3.23 Promoting jobs using inclusive photography; emphasising flexible working and hybrid working in all job ads where appropriate. In addition, 1-2-1 guidance for hiring managers is provided to ensure fair and inclusive processes.
- 3.24 To further define the organisation's commitment to inclusion and diversity at UKCEH, UKCEH are proud to be a Disability Confident Employer. This ensures that all candidates who meet the essential requirements for the role and declare they have a disability on application are invited to interview. As part of being a Disability Confident Employer, UKCEH also regularly review the organisation's recruitment practices for equitability and accessibility. Disability Confident Employer status is renewed under self-assessment annually.
- 3.25 UKCEH will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process. These may include

ensuring easy access to the premises for an interview, providing an alternative to a telephone interview for a deaf candidate or allowing more time for a test to be undertaken. Online interviews are offered to candidates with hearing impairments to enable people's faces to be clearer, switch on closed captions and control volume levels for variable voice levels.

- 3.26 If employees participate in the interview process for a vacancy, employees must not ask job applicants about their health or disability.

Career Development

- 3.27 Any decision made relating to a person's promotion or career development must be free from discrimination and favouritism. UKCEH ensures 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. Panel chairs will be required to consider the diversity of their panels. All promotion panels will be expected to have gender diversity as a minimum. All panels will have an independent panel member. A member of the People team, (or other experienced interviewer), will also support with all promotion panels.

Disability

Discussing Disability in the Workplace

- 3.28 UKCEH do not tolerate exclusive language in UKCEH related to any characteristic. Ableist language is language that is negative, inappropriate, or offensive towards people with a protected characteristic and may take the form of jokes or "banter". If employees adopt such language UKCEH will take action against employees, including for those to whom it applies, under the organisation's disciplinary procedure.

Reasonable Adjustments and Accessibility

- 3.29 If an employee has a disability, the employee does not have to tell UKCEH. However, UKCEH would encourage employees to inform the organisation know so that UKCEH can support employees, for example by making reasonable adjustments to site premises, to aspects of the employee's role or to the organisation's working practices.
- 3.30 If an employee experiences difficulties at work because of employees the individual's disability, the employee should first discuss potential reasonable adjustments with their line manager that may alleviate or minimise such difficulties. UKCEH may need to discuss employee's needs with, and the employee may wish to engage with the organisation's medical advisor and/or Occupational Health to help UKCEH get the right support in place.

- 3.31 If employee's experience accessibility issues due to the employee's disability, for example aspects of the organisation premises or because employees do not have adaptive equipment to help employees perform employee's role, please contact the People Team.
- 3.32 If employees have a disability, or care for someone with a disability, and need emotional help or support or help with practical issues, please contact the organisation Employee Assistance Programme for free confidential advice. Details on how to access this service are on The Hub. In addition, the organisation's Welfare Officers are also available to provide confidential support.
- 3.33 For colleagues who are returning from long term disability related absence, with the employee's permission, UKCEH may work with Occupational Health to support a return to work. The People Team will support to facilitate this.

Training

- 3.34 If employees are involved with making decisions about a person's employment, employees must attend appropriate EEDI training. All new starters must attend EEDI training as part of their onboarding.
- 3.35 UKCEH expects all employees to proactively support the organisation's EEDI initiatives by attending events and workshops organised by the People Development Team to educate themselves on the challenges faced by others and how to help support colleagues in the workplace.
- 3.36 Compliance EEDI training occurs for employees, students and visitors every 48 months via iHASCO (online training platform). Additional training such as unconscious bias, active bystander and inclusive language training is offered yearly and is optional however recommended for line managers and leaders.

4. Governance

Leadership, Roles, and Accountability for EEDI

- 4.1 Overall accountability for EEDI progress at UKCEH sits with the trustee board and executive board. The Chief Executive, Stu Wainwright and Gill Turner Lay (Director for People and Operations) are strategically responsible for EEDI, and the People team are responsible for delivering EEDI on an operational basis.
- 4.2 Zoe Shorter (Talent Manager) is the named EEDI lead at UKCEH for any concerns or queries. In Zoe's absence Jennie Bishop (Head of People) can be contacted.
- 4.3 The organisation's governance structure includes:

- each executive member being an ExCo Champion for a specific EEDI theme, and an intersectionality champion to ensure all elements of lived experience is considered beyond what is highlighted as the primary driver for initiatives across each year.
- the EEDI Working Group who action change within the organisation, collect and disseminate feedback, and progress the EEDI action plans each year
- Staff Network Groups that are set up by employees for employees, which may be for support or advocacy of a particular topic

Compliance, Monitoring, and Review

- 4.4 Employees have the option to complete an EEDI suggestions and confidential concerns form accessible via the intranet to address any issues or suggest reasonable changes, ensuring that EEDI works effectively for all of us.
- 4.5 UKCEH record and analyse diversity and inclusion data (in compliance with the organisation's data protection obligations) on an ongoing basis to assess the impact of this policy and the organisation's equality, equity, diversity and inclusion strategy and annual Action Plan.
- 4.6 UKCEH regularly advertises the ability for colleagues to update and complete their demographic data on Workday if they wish to declare their characteristics. The data in unprocessed formats remains confidentially within the People Team and once processed to statistics or useful analysis, where individual identification is mitigated against, used to initiate EEDI changes and priorities for embedding an inclusive workplace environment.
- 4.7 Gender pay gap reporting is completed annually as per government requirements and is published publicly.
- 4.8 This policy complies with legislation and is underpinned by statutory obligations in the following areas, Employment Rights Act, Equality Act, Public Interest Disclosure Act.
- 4.9 This policy is subject to consultation with the Trade Union.
- 4.10 This policy will be reviewed to incorporate legislation changes.

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