

	EQUALITY, DIVERSITY AND INCLUSION POLICY
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POSITION:	CEO
APPROVED BY:	Board of Trustees
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VERSION	Description	Approved By	Date Approved
1	This policy replaces the charity's previous Equal Opportunities Policy	Board of Trustees	16/12/24

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PURPOSE:

To establish a consistent approach to Equalities, Diversity and Inclusion across the organisation.

Following consultation with key stakeholders, this policy sets out the organisation’s commitment to promoting, supporting and embedding Equality, Diversity and Inclusion (EDI) across the organisation.

NEW EUROPEANS UK’s commitment is embraced by our governing Board and informs all of our activities and their impact on our service users, employees, volunteers, contractors and other stakeholders.

This policy will be communicated to all key stakeholders and made available upon request.

RELATED POLICIES AND PROCEDURES:

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| <ul style="list-style-type: none">• Children and Young People Safeguarding Policy• Safeguarding Adults Policy• Code of conduct for staff and volunteers | <ul style="list-style-type: none">• Modern Slavery Statement• Service User Involvement Policy• Recruitment and Selection Policy• Transgender Equality Statement |
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RELATED STRATEGIES & PLANS:

- | | |
|---|--|
| <ul style="list-style-type: none">▪ Strategic Plan 2025 – 2027▪ Equality, Diversity and Inclusion Plan 2024-2025 | <ul style="list-style-type: none">▪ Marketing and Communications Plan▪ Quality Improvement Plan 2024-2025▪ Service User Involvement Plan 2024-2025 |
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WHO THIS POLICY APPLIES TO:

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|---|--|
| <ul style="list-style-type: none">▪ Service Users▪ Staff▪ Employment and volunteer applicants | <ul style="list-style-type: none">▪ Volunteers▪ Board of Trustees▪ Sessional workers▪ Contracted professionals e.g play therapists consultants and counsellors. |
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POLICY IMPLEMENTATION

APPENDIX I: Transgender Equality Statement
APPENDIX II: Equality, Diversity and Inclusion Plan 2024-2025

1. INTRODUCTION

NEW EUROPEANS UK recognises that equality is not simply about treating everyone the same and that equity and making appropriate adjustments to ensure equal opportunities for all are key.

We are aware that Equalities, Diversity and Inclusion (ED&I) won't be something that gets dealt with by a policy or ED&I plan alone.

We acknowledge that ED&I is a way of thinking and behaving that must be embedded in everything we do, the way we think about ourselves and in our work.

As we develop our actions to achieve best practice in ED&I, we will prioritise addressing disability and racial inequality. We know there is a great deal to do.

This ED&I policy, and associated action plan, will be a living piece of work with everyone involved in our work at NEW EUROPEANS UK, including external colleagues. Our staff, volunteers and service users will be encouraged to keep suggesting new ideas and guiding the nature and pace of this policy's implementation and its future development. Everyone has an important contribution to make.

This policy and ED&I Plan 2024-2025 have been developed in consultation with our service users, volunteers, trustees and staff team.

As a result, this policy and plan aims to reflect their needs and priorities.

2. DEFINITIONS

According to the Chartered Institute of Personnel Development (CIPD) guide to building inclusive workplaces:

Diversity refers to demographic differences of a group – often at team or organisational level. Often, diversity references protected characteristics in UK law: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Equality means equal rights and opportunities are afforded to all. The 2010 Equality Act in the UK protects those with protected characteristics from direct and indirect discrimination in the workplace.

Equity recognises that treating everyone equally has shortcomings when the playing field is not level. An equity approach emphasises that people should not always be treated the same, but that they are treated according to their own situation.

Inclusion is often defined as the extent to which everyone at work, regardless of their background, identity or circumstance, feels valued, accepted and supported to succeed at work.

3. POLICY STATEMENT

NEW EUROPEANS UK's work on equity, equality, diversity and inclusion is about ensuring we have an organisation culture that enables everyone to feel part of what we do and that our work and services recognise, adapt and respond to people's individual background, experiences and needs.

At NEW EUROPEANS UK we aim to:

- value the voices and experiences of our service users and key stakeholders.
- have a diverse team of people working with us (which includes staff, volunteers, service users, associates and contractors) that is representative of the communities we serve.
- go beyond compliance with the Equality Act 2010, recognising and addressing the structural inequalities which limit equality of opportunity for many.
- recognise that a particular characteristic will never be all of someone's identity and experience and will be connected to multiple other parts of their identity and life.
- take a whole person approach to our work that acknowledges the needs and experiences of individuals.
- promote ED&I as a way of thinking and behaving which must be embedded into everything we do and the way we think about ourselves and our work.
- be an inclusive employer and service provider, aiming to provide equality and fairness for everyone we employ and work with.
- work collaboratively with colleagues, service users, external agencies and other stakeholders to address all forms of inequality and discrimination.
- practice high standards of equality, diversity, equity and inclusion ethics.
- be accountable and transparent as an organisation and in our work.

4. POLICY AIMS

To support our commitment to equality, diversity, equity and inclusion, this policy aims to:

- prevent discrimination, eliminate prejudice, promote inclusion and celebrate diversity within the organisation.
- ensure that EDI is embedded in everything we do.

- help us deliver our charity’s vision, mission and aims.
- help us to uphold our values and principles.
- ensure we comply with our legal and regulatory responsibilities; as set out principally in the Equality Act 2010 and Human Rights Act 1998.
- ensure this policy covers all aspects of equality including race, religion or belief, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, sexual orientation, disability and age (as specified by the Equality Act 2010 and its ‘Specific Duties’ clauses.)
- ensure this policy applies to everyone who receives a service from us, forms part of our governance, is employed or contracted by us or who volunteers for us.
- be fair in our dealings with everyone – board members, staff members, service users, volunteers and organisation partners – with whom we have relationships and taking into account the diverse nature of their culture and backgrounds.
- ensure that anyone who works on our behalf demonstrates commitment to ED&I.
- ensure we develop as an open, fair and inclusive organisation.

5. OUR COMMITMENT

NEW EUROPEANS UK is committed to:

- complying with all legal and regulatory requirements, and any subsequent legislation, which apply to the Equality Act’s protected characteristics.
- promoting equality through all of our activities as an employer, partner, influencer and service provider
- actively encouraging and engaging our service users, volunteers and staff in shaping our organisation and services.
- ensuring our Board of Trustees and staff team are accountable for the embedding of our ED&I approach and for monitoring our actions and performance on ED&I.
- ensuring that everyone we work with complies with this policy as well as our policy on bullying and harassment and promoting community cohesion in our neighbourhoods.
- taking all reasonable steps to ensure our partners, suppliers and organisations connected to us are actively committed to ED&I principles.

6. POLICY IN PRACTICE

To meet our policy commitments and achieve our policy aims, we will work to the following best practices:

6.1 Adopt clear strategies

We will:

- devise an organisation-wide ED&I action plan and review it each year, reporting the outcomes to the Board of Trustees.
- put in place appropriate resources to deliver our ED&I aims and objectives.
- consider legal status as an additional ground for ED&I considerations to ensure we would not deny a person service on the grounds of their legal status in the UK.

6.2 Use information and analysis to drive strategy and action

We will:

- collect, review, and measure appropriate data on a regular basis to monitor our ED&I performance, including governance, recruitment, our workforce, service users, local demographic data, complaints data and service satisfaction.
- summarise and report on the ED&I data gathered, within a demographic context where relevant, and report to the Board of Trustees with appropriate recommendations to enhance ED&I at NEW EUROPEANS UK.
- provide a full explanation of why information is collected and what we use it for, treating sensitive personal data confidentially and only for the purposes of promoting and ensuring equality and fairness and improving service outcomes.
- take appropriate steps and actions to address any ED&I issues identified by the above reporting.

6.3 Embed best practice

We will:

- ensure that NEW EUROPEANS UK trustees, staff and volunteers receive mandatory up-to-date training in ED&I as part of their induction.

- ensure NEW EUROPEANS UK trustees, staff and volunteers receive ED&I refresher training when required.
- support trustees, staff and volunteers to enable them to champion ED&I and meet this policy's objectives.
- make sure employees and volunteers have the skills and knowledge to understand how to address prejudice and unconscious bias.
- support individual commitment to and ownership of our ED&I objectives by ensuring that appraisal conversations include ED&I performance.
- make sure that ED&I informs every aspect of our approach to service provision and meeting the support needs of our service users.
- make sure that through our procurement processes we appoint partners, professional associates and suppliers with a robust and compliant approach to ED&I.
- actively encourage people from protected groups to participate in our activities and services, where their participation is disproportionately low.

6.4 Have in place reasonable and accessible procedures and approaches to support EDI

- Make a clear commitment to customers on how we meet service requirements.
- Support effective communication by providing a range of contact methods, shaped to customers' requirements, including effective use of digital services.
- Ensure that no current or potential customer is discriminated against by letting or selling a property on less favourable terms due to a protected characteristic.
- Ensure that all human resources and recruitment procedures reflect the principles in this policy including equality of opportunity; this includes flexible working arrangements to help maximise the potential of all current and potential employees, and relevant procedures for board and committee members.
- Have up to date and recognised procedures for the management of incidences of domestic abuse, hate crime and other forms of abuse and discrimination.
- Involve service users and customers in shaping and scrutinising our services.
- Have procedures in place to ensure our properties comply with our legal obligations to meet requirements arising from disability and other protected characteristics including Aids and Adaptations procedures for customers.

- Recognise that disability includes mental health and that not all disabilities are visible.
- Ensure that our workplace is both compliant with legislation and welcoming to those with particular requirements regarding accessibility and that this extends to use of other venues and conduct of meetings.
- Recognise that some vulnerable groups of people may need particular support and address this by having robust procedures in relation to Safeguarding/Adult Support and Protection, Child Protection and Modern Slavery.

7. POLICY REVIEW

To enable the effective implementation, monitoring and review of this policy, NEW EUROPEANS UK has set up a specific EDI Group consisting of senior managers, Board members, staff, volunteers and service users (the Leadership Group)

The Equality & Diversity Best Practice Group meets quarterly (or more frequently as required).

The Leadership Group reports to the Board on a bi-monthly basis and these reports feed into operational, strategic and quality improvement plans.

All managers and staff report on EDI issues, policy implementation and performance indicators at monthly staff team meetings.

This policy will be reviewed by the Board of Trustees on a regular basis and at the latest every three years.

Other key stakeholders will be invited and involved in the policy review consultation process.

8. POLICY LINKS TO LEGISLATION

The following legislation is relevant to this Equality, Diversity and Inclusion Policy:

- Anti-social Behaviour, Crime and Policing Act 2014
- Equalities Act 2010
- Human Rights Act 1998.

- Housing Act 1985
- Housing Associations Act 1985
- Housing Act 1988
- Local Government and Housing Act 1989
- Housing Act 1996
- Homelessness Act 2002
- Housing Act 2004
- Housing (Wales) Measure 2011
- Housing (Wales) Act 2014
- Renting Homes (Wales) Act 2016
- Abolition of the Right to Buy and Associated Rights (Wales) Act 2018
- Regulation of Registered Social Landlords (Wales) Act 2018
- Renting Homes (Fees etc.) (Wales) Act 2019
- Welsh Language Act 20

9. POLICY LINKS TO NATIONAL QUALITY STANDARDS & CODES OF PRACTICE

BS 76005 Code of Practice: Valuing People through Diversity - The British Standards Institution (2017)

APPENDIX I

TRANSGENDER EQUALITY STATEMENT

NEW EUROPEANS UK is committed to equality of opportunity and values and respects the diversity of all its employees, volunteers and service users.

We understand and respect that there can be differences between assigned sex and gender identity and expression and we value the unique contribution of all staff and customers, including individuals who identify outside of the gender binary.

We have a zero tolerance approach to discrimination, victimisation or harassment on the basis of a person's gender identity.

We aim to provide a welcoming and supportive environment for people to be who they are, irrespective of their gender identity. We will also seek to provide a supportive environment for people who are considering, undergoing or who have undergone transition, as provided for under the Equality Act 2010.

Transgender is an umbrella term and there are many different identities that fall under this term, including trans men, trans women, inter-sex people, people who cross-dress on an occasional basis and other people who may identify as neither male nor female (non-binary). A non-binary person is somebody whose gender identity does not fit into the gender binary of male or female. A non-binary person may consider themselves to be neither male nor female, or both, or sometime male and sometimes female. They will sometimes prefer to refer to themselves using non-gendered pronouns, such as "they" or "ze".

A "gender fluid" person is someone who fluctuates between more than one gender or between having a gender and not having one. A person may identify as a male, female, neutral, non-binary, or a combination of identities, depending on the day. It is not related to a person's sexual orientation.

People have the right to self-identify and many people reject the whole idea of binary tick-boxes and describe themselves in non-binary, or more wide-ranging terms such as pan-gender, poly-gender, third gender and gender queer.

Through our related policies and procedures, NEW EUROPEANS UK will strive to support all transgender people who either work for us or who receive a service from us, ensuring that our staff are well trained and supportive. We will seek to ensure that explicitly gendered language is not used in a policy if it is not needed and will provide guidance for our staff on how to use trans friendly pronouns.

NEW EUROPEANS UK will treat anybody's gender identity with dignity and respect, regardless of the law. Although "gender reassignment" is one of the nine protected characteristics as provided for under the Equality Act 2010, we aim to go above and beyond the protection of people undergoing gender reassignment. We have extended our commitment by supporting and protecting transgender employees and customers from harassment, discrimination and victimisation which has occurred or is occurring due to their gender identity. This will include people who do not live full time in their preferred gender, those who do not intend to undergo gender

reassignment and intersex people (born with a wide range of natural variations in sex characteristics that do not fit the typical definition of male or female.)

APPENDIX II

Equality, Diversity and Inclusion Plan

Improving equity, equality, diversity and inclusion at NEW EUROPEANS UK

1. Purpose and vision

The purpose of this equity, diversity and inclusion (EDI) strategy is to set out NEW EUROPEANS UK's EDI objectives for 2025 - 2027 and the steps we need to take to deliver against these objectives.

We aspire to be a genuinely inclusive charity through diverse representation at all levels, a culture that supports staff and volunteers to fully be themselves, and to be a charity that is anti-racist and able to demonstrate how we have removed structural barriers that perpetuate racism, ableism and other discriminatory behaviours.

Our diversity and inclusion activity for our staff and board will ensure that we adhere to NEW EUROPEANS UK's [code of conduct](#). This commits us to creating a warm and welcoming environment for all and to ensure that our members, every person who works for or with us, volunteers with us or otherwise comes into contact with us is treated with dignity and respect, and feels that they are in a safe and supportive environment, free from inappropriate, discriminatory, offensive or harmful behaviour.

The strategy will also help us plan how we comply with the duties placed on NEW EUROPEANS UK by the Equality Act 2010, which states that it is against the law to discriminate against someone because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

We don't think there is a hierarchy of oppression: all inequality needs to be tackled. In order to implement real change, we need to focus our limited resources, hence this plan's focus on the three areas of race, disability and gender. We recognise that an individual's identity is not limited to one dimension and we hope that our work will contribute to more inclusivity within NEW EUROPEANS UK and our members' organisations for all under-represented people.

Whilst we adhere to equality legislation, that is the minimum activity we undertake. We aspire to be better than the minimum of legislation and we also recognise

inequalities such as caring responsibilities, social mobility and ways individuals can be discriminated against, such as class or accent discrimination.

This plan details what activities we need to pursue to meet our objectives and how we will monitor our progress and success in meeting them. We will ensure that our staff and trustees understand the part they play in helping NEW EUROPEANS UK deliver on our EDI objectives and realise our vision by regularly providing resources and learning materials.

This strategy is a living document which we will keep under review so we can adjust our approach as and when required.

2. Context

[McKinsey's research](#) on diversity shows that companies with more diverse gender, culture and ethnicity outperform employers that don't support diversity.

The research found that companies in the top quartile for gender diversity experience outperform by 21%. For ethnic and cultural diversity, there was a 33% likelihood of outperformance.

[However, fewer](#) than one in 10 voluntary sector employees (9%) are from Black and minoritised ethnic backgrounds – a lower proportion than both the public and private sectors (both at 12%) and the UK population (14%). Only between 4-8% of executive and non-executive leaders in the sector are from BAME backgrounds. Groups classified as BAME include people identifying as Asian/Asian British, black/African/Caribbean/black British, white Irish, Arab, Latinx, Indian, Pakistani, Bangladeshi, Chinese, or Gypsy or Irish Traveller, as well as those of multiple ethnic backgrounds. In this document we use 'BAME' in a particular and limited way to describe the aggregate experiences of (often) racialised and minoritised people categorised as other than 'white British'.

In the 2020 Pay & Equalities Survey, which is completed by charity CEOs across England, Wales, Scotland and N Ireland, 16% of respondents identified as having an impairment, health condition or learning difference. Women are also underrepresented in leadership positions within larger charities, while women of colour and/or disabled women are underrepresented at all sizes of charities.

The impact of the Covid-19 pandemic and the rise of the Black Lives Matter movement has brought into global focus the structural and systemic racism within our society. The pandemic is also creating rising inequalities in health, education and financial wellbeing with people with protected characteristics likely to suffer disproportionately in all these areas.

3. NEW EUROPEANS UK's progress on EDI

3.1 RACE EQUITY

We still have much work to do on our own systems and processes to ensure we are an anti-racist and genuinely accessible organisation to staff, trustees and members.

3.2 INCLUSION AND ACCESSIBILITY

Delegates with accessibility needs will be personally greeted on arrival and introduced to the disability champion so they have a key point of contact throughout the event. We also allocate reserved seating for disabled delegates depending on their needs (eg access to hearing loop etc).

We continue to make improvements to the website, and will add to photos using Alt+text and improve the accessibility of NEW EUROPEANS UK reports with content being published as individual web pages, in addition to a pdf format.

3.3 PAY TRANSPARENCY

Our pay and performance policy includes a banding system for positions within NEW EUROPEANS UK and makes it clear how staff members can apply for pay reviews.

We hope this improves transparency around pay decisions and improves the opportunity for existing staff members to feed back to the management team about their salary.

3.4 TACKLING DISCRIMINATION, BULLYING AND HARASSMENT

Quarterly check-ins with their line manager enable staff to raise any incidents of poor behaviour.

4. Good ED&I practice

The newly revised Charity Governance Code asks boards to:

- Think about why ED&I is important for their charity and assess the current level of understanding.
- Make space as a board to understand current systems, cultures and the broader context.
- Set out plans and targets tailored to the charity and its starting point. Develop context-specific, realistic and time-bound goals.
- Monitor and measure progress through a process of regular self-assessment.

- Be transparent and publish the charity’s progress, including sharing progress, challenges and learning.

5. Current status

Staff and trustee diversity targets

NEW EUROPEANS UK’s staff and board targets are:

NEW EUROPEANS UK STAFF	TARGET WITHIN FIVE YEARS (FROM 5.19)	STATUS AT JAN 2024	STATUS AT 16 DECEMBER 2024
Gender balance (women:men)	70:30	80:20	80:20
Proportion of BAME staff	20%	10%	10%
Proportion of BAME staff at senior management team level	10%	0%	0%
Proportion of staff with a disability or long-term health impairment	10%	0%	0%

NEW EUROPEANS UK TRUSTEE BOARD	TARGET WITHIN THREE YEARS	STATUS AT JAN 2024	STATUS AT 16 DECEMBER 2024
Gender balance (women:men)	50:50	60:40	64:36
Proportion of BAME trustees	30%	10%	20%
Proportion of trustees with a disability or	10%	0%	0%

long-term health impairment			
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6. Key objectives

- We recognise that NEW EUROPEANS UK needs to improve representation of BAME people at senior levels within the organisation, and of disabled people within the staff team.
- We need to increase the number of men on the staff team.
- We need to ensure diversity and inclusion considerations are a natural and integral part of our key business decisions and that staff and trustees understand the need to address bias in decision making.
- We want to maintain current levels of staff satisfaction.

7. Objectives

1. EMBED AN INCLUSIVE WORKPLACE CULTURE

- a. Explicitly integrate EDI goals into our next organisational strategy.
- b. Provide training for staff and trustees at regular intervals, matching our actions to our organisational values.
- c. Regularly review diversity data to identify key demographics which are not present in the staff team or board.
- d. Include regular discussions on EDI within board, SMT and staff team meetings.
- f. Define and promote inclusive behaviours:
 - Agree a common understanding of what inclusive behaviours are
 - Ask as part of annual goal-setting reviews about what staff members have done to help achieve more inclusivity at NEW EUROPEANS UK
 - Include inclusivity as part of the monthly staff recognition award.
- g. Ensure we always have a named senior team member and trustee responsible for staff wellbeing to whom staff can speak if they do not wish to speak to their line manager or the CEO.
- h. Continue to ask if staff have experienced any personal harassment in the form of unkind words or behaviour
- i. Ensure marketing materials reflect our commitment to EDI by reviewing marketing materials to assess gaps in diversity

j. Develop a manifesto for inclusion around disability (responding to our Hidden Leaders report) to include:

- Principles which guide NEW EUROPEANS UK's work
- How to request an adaption or adjustment
- Transparency about how and when that will be made
- Relevant information about organisational targets around disability inclusion
- What disabled people can expect if interacting with the organisation or disclosing needs, including the availability of alternative communication methods and formats.

k. Create a wellness action plan in the workplace, to help actively support employees' mental wellbeing, and to help staff understand what is available and how to support one another positively in the workplace.

n. Review the exit interview process to identify trends of negative experiences related to characteristics.

2. ADDRESS UNCONSCIOUS BIAS IN RECRUITMENT AND PERFORMANCE MANAGEMENT

a. Review and formalise recruitment practices, developing standard operating procedures which ensure equity is in-built, ensuring they are consistent with the advice in our [Racial Diversity in the Charity Sector report](#).

b. Continue to ask staff about satisfaction with their pay and line management.

c. Embed new pay policy, benchmarking and salary banding.

d. Review current salary levels to reduce any inequity.

3. MONITORING AND REPORTING

a. Annually publish our progress towards board and staff diversity targets

b. Publish this EDI plan on the NEW EUROPEANS UK website.

4. SECTOR-FACING WORK

a. Continue to make EDI a policy priority, including it in the policy strategy.

b. Create a more visible/accessible section on our website relating to EDI information and advice, with top level navigation.

- c. Include regular equity and inclusion training in our programme and events calendar and encourage discussion within our network to enable peers to support each other in their progress
- d. Explore opportunities to work with other groups to progress race equality within our sector.
- e. Review and agree NEW EUROPEANS UK's approach to individuals within membership who exhibit discriminatory behaviour.
- j. Work with Voice4Change England to explore how we take forward the Making Diversity Count joint project.
- k. Promote the recommendations of Hidden Leaders report to encourage members to progress in their own efforts to become disability inclusive organisations.
- l. Look to work with a more diverse set of suppliers and corporate partners, including minority-owned or disability-led businesses.
- m. Review NEW EUROPEANS UK's approach to paying speakers at events.

ROLES AND RESPONSIBILITIES

We will ensure that NEW EUROPEANS UK staff are aware of their responsibilities in implementing this strategy. Responsibilities include:

- Senior managers to demonstrate inclusive leadership and champion diversity and inclusion across their teams.
- Line managers to lead teams inclusively, ensuring that individuals can realise their full potential and capability.
- All senior managers to be aware of their responsibilities as employers in relation to the Equality Act 2010 and other relevant legislation.

9. NEXT STEPS

- Review progress January 2026.