



ANTI DISCRIMINATION, RACIAL, GENDER EQUALITY, DIVERSITY AND INCLUSION POLICY

CONTENTS

1. Purpose
2. Objectives
3. Scope
4. Key Racial, Gender Equality, Diversity and Inclusion Concepts
5. Management and Delivery of this Policy
6. Selection, Recruitment and Retention
7. Service Delivery
8. Procurement
9. Monitoring and Evaluation
10. Review

1. PURPOSE

1.1. Policy Statement

STARS ON ICE recognises that its clients, staff and sub-contractors come from diverse backgrounds, with varying experiences and needs. We are committed to ensuring gender and racial equality, diversity and inclusion are embedded into our day to day practices.

STARS ON ICE actively promotes fairness, respect, gender and racial equality, diversity, inclusion and engagement and is committed to continuous improvement.

1.2. Through our policies and in our day-to-day work and fulfilment of our responsibilities, STARS ON ICE is committed to promoting equality and fairness and combating discrimination. This applies to everyone, regardless of their gender, civil status, family status, sexual orientation, religion, age, disability, race (includes race, colour, nationality or ethnic or national origins) or membership of the Traveller community.

2. OBJECTIVES

2.1. In order to effectively implement its commitment to being an equal and diverse firm, STARS ON ICE has identified the following objectives:

- Provide the firm's leaders with the skills and knowledge to fully embed fairness, respect, gender and racial equality, diversity, inclusion and engagement into the firm's culture, strategy and processes.
- Provide racial and gender equality, diversity and inclusion training to all staff and leaders, which will include content on their responsibilities, relevant legislation, and this policy.
- Ensure that each person that interacts with the firm will not receive less favourable treatment than any other person, making adjustments to services where necessary in order to facilitate this.
- Ensure opportunities are accessible to all, introducing reasonable accommodations to facilitate this where required.
- Create an environment where staff and clients are treated fairly and with dignity and respect.
- Enforce a zero-tolerance approach in relation to discrimination, bullying, harassment, sexual harassment, and inappropriate behaviour, thoroughly investigating any reported incidents and taking appropriate actions.
- Ensure fair treatment for job applicants, which is free from bias.
- Make the best possible use of our existing and potential workforce through effective talent management and training.
- Provide a safe, supportive, and welcoming environment where everyone can contribute to their fullest potential.
- Challenge discrimination and promote gender equality, diversity and inclusion.

Provide training to staff on STARS ON ICE approach to:

- Racial and gender equality, diversity and inclusion, its commitment to zero tolerance in relation to discrimination, bullying, harassment, sexual harassment and inappropriate behaviour and the contents of this policy.
- Act as role models to partner firms and other external stakeholders.
- Undertake Equality Impact Assessments on all policies, processes, and procedures in order to ensure that no direct or indirect discrimination exists within these.

3. SCOPE

- 3.1. This policy applies to the firm, its leadership team, employees, partners and to any external stakeholders that are supported by or engage with the firm.
- 3.2. Gender equality, diversity and inclusion imposes rights and responsibilities on every member of staff. All employees and the leadership will be informed that a Gender Equality, Diversity and Inclusion Policy (the “Policy”) is in operation and that they are bound to comply with its requirements. The Policy will also be drawn to the attention of external stakeholders, job applicants and clients.
- 3.3. The Policy ensures that our statutory equality duties outlined in the Equal Employment Opportunity (Commonwealth Authorities) Act 1987 is met.
- 3.4. The nine discriminatory grounds are defined under the Equal Employment Opportunity (Commonwealth Authorities) Act 1987 as being:
 - Gender
 - Civil status
 - Family status
 - Sexual orientation
 - Religion
 - Age
 - Disability
 - Race (includes race, colour, nationality or ethnic or national origins)
 - Membership of the Traveller Community.

4. KEY EQUALITY AND DIVERSITY CONCEPTS

- 4.1. Diversity can be defined as the visible and non-visible differences between individuals. These differences can be related to race, ethnicity, religion, age, disability, sexual orientation, and gender, as well as the many differences in values, attitudes, beliefs, cultural views, skills, knowledge, education, background, employment, parenthood, marital or civil status, and life experiences of every individual.
- 4.2. Equal Opportunities can be defined as ensuring all those involved with or wishing to be involved with the firm, regardless of their diversity, are provided with opportunity based on their ability or potential to perform the required activity.
- 4.3. Discrimination is unequal treatment of an individual because of their membership of a particular class or group, such as sex, race, or trade union.
 - (a) Direct discrimination occurs where a person is treated less favourably than another person is, has been, or would be treated in a comparable position on the basis of one or more of the nine grounds as set out above: for example, refusing to send someone on a training course because they are married or have children.
 - (b) Indirect discrimination occurs where a person is subject to an apparently neutral provision that puts them at a particular disadvantage compared with other persons because of, for example, their race or gender: for example, declaring a post as being suitable only for a full-time member of staff without proper justification (i.e., establishing the need for a full-time member of staff rather than for part-timers or job sharing).

ANTI DISCRIMINATION, RACIAL, GENDER EQUALITY, DIVERSITY AND INCLUSION POLICY

- 4.4. Discrimination may be subtle and unconscious and may not be easy to identify. For example, discrimination sometimes results from general assumptions about the capabilities, characteristics and interests of particular groups or individuals, which are allowed to influence the treatment of staff or job applicants or clients. This includes unconscious bias.
- 4.5. Harassment or bullying covers any form of unwanted conduct related to any of the discriminatory grounds that has the effect of causing undue stress on individuals and of de-motivating them. Harassment, sexual harassment or bullying of any kind will not be tolerated and serves to undermine the safe, supportive, and welcoming environment that wishes [INSERT FIRM NAME] to encourage.
- 4.6. Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature. Similar to harassment, it is defined as conduct that has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

5. MANAGEMENT AND DELIVERY OF THIS POLICY

- 5.1. Fairness, respect, racial and gender equality, diversity, inclusion and engagement are the responsibility of everyone within STARS ON ICE
- 5.2. The leadership team of STARS ON ICE is committed to embedding racial and gender equality, diversity and inclusion within the business, ensuring that everything we do and the manner in which it is done makes reference to and considers the impact upon our equality objectives.
- 5.3. STARS ON ICE uses the procurement process to ensure that its partners and external stakeholders operate their businesses with similar equality objectives and delivers its services with the same ethos.
- 5.4. It is the responsibility STARS ON ICE to implement, monitor and evaluate the Policy in terms of employment practices (selection, recruitment, and retention), training and service delivery. The Manager is also under a duty to ensure that the leaders are regularly kept updated in terms of the Policy's implementation. Additionally, the implications for the leaders arising from the decisions it makes and the policies it introduces must be made clear to the leaders.
- 5.5. The Policy Statement will be communicated to all staff, clients and other stakeholders using a the website and, where appropriate, included in publications.
- 5.6. Annual work plans are in place that specifically address the racial and gender equality, diversity and inclusion aspects of all areas of work for staff and the leadership team; these support the delivery of the objectives contained within this Policy.
- 5.7. Staff will receive appropriate training to ensure they understand their responsibility not to discriminate and to treat everyone with respect and dignity. Staff are expected to be aware of personal prejudices, unconscious bias and stereotypes and avoid labels at all times.
- 5.8. Existing processes will be used to review and investigate any complaints in relation to discrimination, harassment or bullying, as follows:

ANTI DISCRIMINATION, RACIAL, GENDER EQUALITY, DIVERSITY AND INCLUSION POLICY

- Staff – the employee is encouraged to raise the matter through the Grievance Procedure if the employee believes that s/he has been treated less favourably than another based on any of the discriminatory grounds. The employee is encouraged to raise the matter through the Bullying and Harassment Policy if the employee believes they may have been harassed on any of the nine discriminatory grounds.
 - Clients (those using our services) – clients should raise the matter through the Complaints Procedure.
- 5.9. All complaints will be treated with fairness, sensitivity, respect, and confidentiality for all parties concerned, and the employee will be advised of the correct procedure to undertake as a result of the concerns raised.
- 5.10. It is expected that when staff or leaders represent STARS ON ICE at any time, including through attendance at committees, meetings with external stakeholders and contact with clients, they will ensure that the gender equality, diversity and inclusion principles and practices outlined in this Policy are adhered to.
- 5.11. When representing STARS ON ICE ON In the committees of other agencies, each staff member or leader will endeavour to ensure that racial and diversity and inclusion principles and practices are adopted by those agencies.

6. SELECTION, RECRUITMENT AND RETENTION

- 6.1 Stars On Ice aims to promote race and gender equality, diversity and inclusion as an employer. It also aims to ensure that no job applicant or employee receives less favourable treatment or is disadvantaged by conditions or requirements that cannot be shown to be justifiable within the context of the policy.
- 6.2. Selection, recruitment, training, promotion, and employment practices generally will be subject to regular review to ensure they comply with this Policy. In particular, selection and recruitment procedures will be reviewed annually in order to constantly improve gender equality, diversity and inclusion practices and respond to changes in legislation.
Stars On Ice will monitor data on all applicants as well as those that are successful in order to identify any practices that unintentionally discriminate against specific groups. The firm will ensure compliance with the General Data Protection Regulation (GDPR) at all times.
- 6.3. We will take whatever positive action is required where it can be shown that under-representation of any particular group has occurred in recruitment. Where appropriate and legally permissible, employees from under-represented groups will be given training and encouragement in order to promote gender equality, diversity and inclusion within Stars On Ice
- 6.4. Employees involved in the selection and recruitment process, and in the management of staff, will receive appropriate training to ensure they recognise when they are making stereotypical assumptions or judgements about people, and avoid any discriminatory practices in the way in which they shortlist, recruit, or manage employees. This will include unconscious bias training.
- 6.5. We regard discrimination, harassment, sexual harassment, abuse, victimisation or bullying of staff, clients or of others in the course of work as disciplinary offences that could be regarded as serious

ANTI DISCRIMINATION, RACIAL, GENDER EQUALITY, DIVERSITY AND INCLUSION POLICY

misconduct. Condoning such behaviour could also be treated as a disciplinary offence under the firm's Disciplinary Policy. As well as disciplining the perpetrator(s), we will give appropriate support to people who complain of harassment of themselves or others.

- 6.6. Stars On Ice has considered the working practices it has in place to address inequality and discrimination and how it promotes fairness for all. Examples of these against each of the protected characteristics are given below, but is not a definitive list of all that Stars On Ice does.
- 6.6.1. We recognise that employees have different needs at different stages during their career, both men and women – for example, to balance work and caring responsibilities. We will attempt to accommodate staff requests to work flexibly, whether fixed-term, part-time or some other working arrangement, for whatever reason, so long as agreement is consistent with the needs of the firm. We will also encourage initiatives designed to help staff who wish to return to work after a career break.
- 6.6.2. Our terms and conditions of employment allow for paternity, parental and parents' leave in addition to standard maternity leave, adoptive leave, carers' leave and any other forms of statutory leave, in accordance with current legislation. Allowance is also made for compassionate and dependants' leave to deal with domestic emergencies through our family-friendly policies.
- 6.6.3. We recognise that firms are obliged, under the Equal Employment Opportunity (Commonwealth Authorities) Act 1987, to make reasonable accommodations to support people with disabilities and enable them to do their job without unnecessary difficulty. We will endeavour to make accommodations that are reasonable, whether or not we are obliged to do so by law, and whether or not an applicant with a disability or employee is covered by the definition of 'disability' under the Equal Employment Opportunity (Commonwealth Authorities) Act 1987
- 6.6.4. We are committed to ensuring employees do not experience discrimination (or less favourable opportunities/treatment) on the basis of their race, religion, or belief by:
- Allowing time and, if possible, a place for prayers during the working day and at the workplace as appropriate.
 - Considering, where possible, an employee's dietary requirements in catering for staff and when providing facilities for staff to eat and store food.
 - Allowing staff of particular faiths, where possible, to take their holidays for religious festivals and other religious observance.
 - Trying to arrange job interviews or other important work meetings at times, where possible, that do not clash with important religious festivals.
 - Not imposing, where possible, a dress code with which people of a particular religion cannot comply.
- 6.6.5. We will not discriminate on grounds of age in recruitment, promotion, training, or the availability of benefits – such as pension contributions or health insurance.
- 6.6.6. We will not discriminate on the grounds of gender, where an individual is in the process of gender reassignment, or where an individual has completed this reassignment.
- 6.6.7. Stars On Ice will not discriminate on the grounds of marriage or civil partnership and will support individual need where possible and as required.

ANTI DISCRIMINATION, RACIAL, GENDER EQUALITY, DIVERSITY AND INCLUSION POLICY

- 6.6.8. We will not discriminate on the grounds of an individual's race, colour, sex or on the grounds of sexual orientation, providing everyone, where possible, with exactly the same opportunity to achieve their goals.

Stars On Ice processes are fair and take account of the social, domestic, cultural and physical obstacles to people progressing. We seek to identify where these exist for individuals and take actions to limit these where necessary.

7. SERVICE DELIVERY

- 7.1. We will use a variety of methods to regularly consult with our stakeholders. We will gather their views on existing and planned services, including changes to provision.
- 7.2. We will make public our commitment to combating discriminatory attitudes, where these are encountered, by publishing this policy widely amongst staff and management.

8. PROCUREMENT

- 8.1. Stars On Ice is committed to working with a wide range of suppliers and contractors, from local businesses through to large multi-nationals across a wide range of different types of contracts and purchases.
- 8.2. Racial and Gender equality, diversity and inclusion will be considered during the procurement process and, on the award of contracts, there will be an expectation that contractors comply with the relevant legislation and principles of this policy.

9. MONITORING AND EVALUATION

- 9.1. Stars On Ice will systematically evaluate its services and the effectiveness of its Policy by a variety of means.
- 9.2. Information gathered through the complaints, grievances, disciplinary or other appropriate processes will be analysed by the nine discriminatory grounds, where this information is available, to identify any particular trends. Where any negative trends are identified, these will be investigated fully, and recommendations made to the leadership team.
- 9.3. We will report to the leadership team as required on the outcomes of monitoring and evaluation activities, including any trends in relation to the particular nine discriminatory grounds.

10. REVIEW CYCLE

- 10.1. Responsibility for review of this Policy sits with Stars On Ice
- 10.2. Additionally, an interim review would be conducted in the following circumstances:
- A change is made to relevant legislation, including but not limited to the Acts.
 - The investigation into a negative trend indicates a review of this policy is appropriate.
 - An external review of our services identifies the need for a policy review.