

Policy Group: Human Resources
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Diversity and Inclusion Policy (Employees)

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TARGET AUDIENCE (including temporary staff)	
People who need to know this document in detail	HR Operational Team All Managers
People who need to have a broad understanding of this document	All Colleagues
People who need to know that this document exists	All Colleagues

1. Policy Summary / Statement

St Andrew's Healthcare is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. And we value our people for the differences they bring to the table. These differences - this diversity - is powerful.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all.

To support this inclusive culture, this policy:

- Outlines our commitment throughout the employment lifecycle to equality, diversity and inclusion and sets out how we put this commitment into practice;
- Explains the behaviours we expect of our people in support of this commitment; and
- Sets out the key steps we take to make our culture as inclusive as possible, including our diversity and inclusion framework and how we ensure equality of opportunity throughout the employment lifecycle.

This policy or associated procedures does not form part of any employees' terms and conditions of employment and maybe amended or withdrawn at any time.

2. Links to Policies & Procedures

- Disciplinary Policy
- Grievance Policy
- Bullying and Harassment Procedure
- Transgender Equality Procedure
- Transgender Inclusive Healthcare Procedure
- Freedom to Speak Up Policy
- Human Rights, Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Safeguarding of Vulnerable Adults and Children Policy
- Recruitment and Selection Policy
- Menopause Policy

Policies and Procedures are available via A-Z:

[Policies - Policies - A-Z \(sharepoint.com\)](#)

3. Scope

This policy applies to all employees, visitors, clients, suppliers, customers, patients or service users irrespective of race, nationality, ethnicity, sexual orientation, religion, faith or belief, disability, age, gender, gender identity/expression, marital or civil partnership status, parental status, proposed or actual gender reassignment, pregnancy and maternity, socio-economic status, HIV status, political affiliation, professional association, trade union membership or any other category (known as 'protected characteristics') where discrimination cannot be reasonably justified.

St Andrew's Healthcare is an equal opportunities employer, as such this policy also relates to job applicants, and is relevant to all stages of the employment relationship. The Recruitment and Selection Policy seeks to ensure all recruitment practices, promotion, succession planning, career development and acting up arrangements are free from direct and indirect, perceived or associative discrimination.

The policy accompanies our Grievance Policy, Bullying and Harassment, Transgender Equality and Transgender Inclusive Healthcare Procedures.

In implementing this policy, Managers must ensure that all staff are treated fairly and within the provisions and spirit of the Charity's Policy.

If any employee feels (or groups of employees collectively feel) they are being subjected to bullying or harassment, or have been discriminated against, they should follow the Grievance Policy.

It is the intention of the Charity that individuals who raise concerns get the matter rectified as soon as possible. If an employee feels they are unable to discuss their concerns with their Line Manager, HR is available to all staff for advice and guidance. The Charity aims to ensure that staff feel comfortable about raising such complaints.

No individual will be penalised for raising complaints unless the substance of the complaint is untrue or the complaint is made in bad faith, for example out of malice. Deliberate false allegations may themselves lead to disciplinary investigation.

Where applicable, Employee's may wish to seek advice from a relevant trade union representative, Charity Network or Freedom to Speak up Guardian.

Employee's should be aware that there is an independent service for the reporting of any dishonest or unethical behaviour, corruption, health and safety breaches, harassment, bullying or other forms of wrongdoing. The service has been set up by the Charity, working in partnership with Safecall on 0800 915 1571 or www.safecall.co.uk/report, who provide a professional, independent and confidential means of reporting concerns.

Failure to comply with this and accompanying policies and procedures may result in disciplinary action.

4. Background

Everyone has the right to be treated equally, fairly and with dignity and respect at all times, in providing and using our services. No patient or other person using our services, no employee whether full or part-time, day night or bank worker, temporary, seasonal, a job applicant (both internal and external), contractor, volunteer or other stakeholder is to be subject to discrimination or subject others to discrimination and it is expected that all of the above will adhere to this policy.

By being inclusive, no individual should be treated disproportionately by reason of their ethnic origin, disability, gender identity/expression, proposed or actual gender reassignment, sexual orientation, age, religious belief, marital status or caring responsibilities. Every individual within the Charity will be expected to consistently demonstrate their personal commitment to, and responsibility for, contributing to the creation of an inclusive and diverse culture and to challenging behaviours that are unacceptable.

5. Definitions

The definitions of equality, diversity and human rights that the Charity follow are detailed below:

Equality	Creating a fairer society where everyone has the same chance to fulfil their potential, to participate fully in the community and have access to the services they need. Equality of opportunity is about equal access, treatment and outcomes that meet individual needs.
Equity	Ensuring that everyone is treated fairly, by removing barriers to resources or opportunities that some groups in society face.
Diversity	Recognising and valuing differences in their broadest sense: understanding people's differences and similarities to help the individual, the Charity and society as a whole.
Human Rights	Basic rights and freedoms that belong to every person in the world. Which are based on core principles like dignity, fairness, equality and respect. They affect a person's day-to-day life and protect their freedom to live the life they chose, to take part in Charity decision-making at all levels, to help them to be safe, be treated fairly and take an active part in the workplace and their community.
Inclusion	A sense of belonging; feeling respected, valued for who we are; feeling support and commitment from others so that people can do their best. It is about positively striving to meet the needs of different people and taking action to create environments where everyone feels respected and able to achieve their full potential.
Protected Characteristics	Detailed in the Equality Act 2010 for the workplace are age, gender, gender reassignment, race (ethnicity and nationality), disability, sexual orientation, faith and belief, pregnancy and maternity (including breastfeeding) and marital and civil partnership status (including same sex couples).

The types of discrimination are defined as:

Direct Discrimination	Treating a person less favourable than others are or would be treated in the same or similar circumstances because of a 'protected characteristic'. For example, refusing to employ an applicant because of their race, religion or because they are transgender is less favourable treatment.
Indirect Discrimination	Applying a requirement or condition which, although applied equally to all persons, is such that a considerably smaller proportion of one group can comply with that requirement or condition and it cannot be shown to be justifiable, i.e. only allowing full time working when part-time working is operationally feasible.
Associative Discrimination	Treating someone less favourably because they are associated with someone who has a protected characteristic.
Discrimination by Perception	Treating someone less favourably because you perceive them to have a protected characteristic even if they do not.
Discrimination arising from Disability	Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified.
Victimisation	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.
Harassment and sexual Harassment	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.
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

6. Key Requirements

6.1. Paying Employees Fairly

St Andrew's Healthcare strives to achieve fairness and equity in pay and reward. All employees carrying out equal work should receive equality of terms with regard to benefits, contractual conditions and fair and transparent pay and reward systems, subject to justifiable variables such as career pathways and performance related pay.

To achieve this, St Andrew's Healthcare ensures:

- Regular monitoring and analysis of pay practices across the Charity based on median and average full-time equivalent salary and pay distributions for those considered to be doing equal work
- Analysis is conducted at least annually in order to identify, explain any unjustifiable pay gaps and recommend realistic actions designed to eliminate them and establish whether or not there is a disproportionate impact on a particular group or groups of employees.

6.2. Reasonable Adjustments

Employees who are or becoming disabled in the course of their employment should inform the Charity about this disability or significant illness. Line Managers will then arrange to discuss with the employee what reasonable adjustments to their role, working conditions or environment might assist them in the performance of their duties. Where reasonable and reasonably practicable, such adjustments will be made to ensure that individuals are not disadvantaged because of their disability.

Advice should always be sought from HR and Occupational Health as to what is defined as a disability as this covers a very broad range of conditions and/or what may constitute a reasonable adjustment, as not all disabilities are visible and reasonable adjustments can consist of a wide range of minor to major modifications.

6.3. The Business Language

St Andrew's Healthcare employees and patients have a rich diversity of nationalities with many languages used throughout the Charity. However, a diversity of languages can sometimes be confusing for patients; it is important that employees, contractors and visitors are aware and remember that their use of language can increase and decrease patients wellbeing.

The Charity requires a common language which is understood by all; this is known as the business language of the organisation. St Andrew's Healthcare has identified that the business language will be English. People speaking a language others around them cannot understand can make them feel excluded. Some of our patients have issues about paranoia and so can be particularly vulnerable to feeling stressed and afraid and then reacting to those feelings. This could put patients and people around them at risk and set back patient recovery.

St Andrew's Healthcare provides interpreter and translation services through external agencies wherever required and will support any existing staff member who needs to develop their competence in their use of the English language.

Employment legislation is designed to prevent discrimination and identifies actions which are regarded as unlawful. Discrimination may be either direct or indirect, perceived or by association, it may include victimisation and/or harassment and may be subtle.

The Charity aims to develop management competencies and a culture that enables accurate and sensitive identification of all forms of discrimination, robust procedures for reporting and managing instances of discrimination and various networks and channels of support for individuals who may be experiencing discrimination.

Certain characteristics people have are protected in law and are set out in the Equality Act 2010 and summarised above. All of us have at least some of these 'protected characteristics'. Human rights law includes, and often goes beyond those characteristics to cover fundamental aspects of life such as the right to freedom of thought, conscience and religion and the right to freedom from discrimination that is not defined by a set list of characteristics.

Individuals must not practice, or induce others to practice, any form of bullying, discrimination, harassment or victimisation against any other person.

If an employee is uncomfortable approaching their Line Manager, or believes that their Line Manager has behaved inappropriately, they can contact a range of other people for advice and support, such as HR, other/second Line Managers, or Speak up Guardian.

To ensure positive practice is the responsibility of all, it is expected that everyone will commit to:-

- Building awareness of, and positive attitudes to 'difference', including a willingness to learn about differing perspectives;
- Treating everyone fairly and respectfully;
- Challenge and report discrimination – either directly or by reporting to another person, or by using the Freedom to Speak Up Policy.
- Seek advice if unsure about any Diversity and Inclusion issue.

Hate crimes will not be tolerated in St Andrew's Healthcare, and will be thoroughly investigated and disciplinary/follow up action taken where appropriate. This applies to all incidents whether staff to patient, patient to staff, patient to patient or staff to staff, including external agencies and suppliers. Full details of how to report and respond to hate crimes are contained in the Bullying and Harassment Procedure.

6.4. What we expect from you

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 visitors, clients, suppliers, customers, patients or service users) 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 any of our people are found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, action will be taken against them including (for those to whom it applies) under our Disciplinary Policy.

You should be aware that you can be personally liable for discrimination and harassment.

6.5. Employee Networks

We are proud to have a number of Employee Networks to provide a forum for people who have a passion for, or a connection with, a particular aspect of equality, diversity and inclusion.

The aim of these networks is to:

- Provide networking opportunities and community support;
- Organise events to raise awareness and provide education; and
- Contribute ideas and suggestions for ways the organisation can be more diverse and inclusive.

Each Network welcomes Allies. Allies are people who are not personally affected, but who speak up for under-represented groups by calling out and challenging unconscious bias, as well as challenging non-inclusive working practices.

The Networks within the Charity are:

DAWN	Disability and Wellbeing Network. DAWN aims to support and help colleagues with visible and non-visible disabilities in the workplace so that all colleagues feel they belong, can thrive, and bring their whole selves to work. The 5 key pillars are Wellbeing, Mental Health & Trauma, Physical Disability, Sensory Diversity and Neurodiversity.
PRIDE	Our PRIDE Network (formerly known as the LGBTQ+ Network) is for employees who identify as lesbian, gay, bisexual, transgender, queer (or questioning) intersex and Asexual, as well as allies.
UNITY	Is open to colleagues from across the Charity from all ethnic backgrounds, allies and people interested in exploring and supporting the experiences of people from diverse backgrounds in healthcare.
WISH	The WiSH (Women in St Andrew's Healthcare) network, is fully inclusive and open to all staff. The group is committed to the empowerment of women in the workforce.

6.6. Reverse mentorship

We run a reverse mentorship scheme where members of the senior leadership team can opt to learn from others about their lived experiences and the challenges they have faced at work because they are from an underrepresented or minority group. The aim of the scheme is to increase understanding of people's lived experiences among the organisation's senior team, as well as an appreciation of the intersectional nature of diversity and inclusion.

Reverse mentoring equips the mentee with the knowledge and information to take practical steps to support equality, diversity and inclusion in the parts of the organisation where they have influence. If a colleague would like to take part in the scheme either as a mentor or mentee please contact your Manager or the Learning & Development team.

7. Roles and Responsibilities

Role	Responsibility
Board of Directors	The Board, through the Executive, are ultimately accountable for the design and delivery of all policies and procedures.
Chief Executive Officer	The Chief Executive maintains overall responsibility for ensuring safe practices for patients and staff, which are delivered in part by the development and implementation of, and maintenance and monitoring of compliance to, related policies of the Charity.
HR Director	Responsible for ensuring all HR policies are reviewed according to legal requirements and Charity timeframes and allocating policy reviewing responsibility across HR team.

Operational HR (<i>HR Business Partners and Senior HR Advisers</i>)	Responsible for reviewing this policy and ensuring the practical application of this policy, providing managers with support and guidance.
Line Managers	Responsible for their own awareness of this policy and for adhering to the requirements of it in practice. Responsible for bringing this policy to the attention of all staff in their area.
All Staff	Responsible for their own awareness of St Andrew's Policies and Procedures and for working within the requirements of same. Maintaining professional conduct and responsibility for their own re-registration.

8. Monitoring and Oversight

The purpose of equality audit and monitoring is to ensure that policies and practice are free from discrimination and that there is equality of opportunity for all.

All employees and job applicants will be asked to complete equal opportunities monitoring either at recruitment or via SAP Self Service, disclosing their sensitive details such as gender, ethnicity, age, faith and belief, sexual orientation, gender identity and any disabilities that they may have.

The information provided will be collated and stored in accordance with legislation and St Andrew's Healthcare Data Protection Policy and will be used to enable the Charity to understand the diversity mix of its workforce, to monitor the effectiveness of this and associated policies, to enable equality analyses to be conducted and to support planning of services and monitoring of practices. It will only be viewed in an anonymised state and by individuals with a genuine need.

The Charity will also use external audit assessment tools where appropriate and beneficial, to help understand how St Andrew's Healthcare is addressing health inequalities and improving services.

This Policy is also accounted for within the Charity's Risk Management Framework, incorporating appropriate controls and mitigations and as such there will be periodic reviews over the accuracy and effectiveness of any policy related controls. For further information, go to the Risk Management Hub page.

9. Diversity and Inclusion

St Andrew's Healthcare is committed to *Inclusive Healthcare*. This means providing patient outcomes and employment opportunities that embrace diversity and promote equality of opportunity, and not tolerating discrimination for any reason

Our goal is to ensure that *Inclusive Healthcare* is reinforced by our values, and is embedded in our day-to-day working practices. All of our policies and procedures are analysed in line with these principles to ensure fairness and consistency for all those who use them. If you have any questions on inclusion and diversity please email the inclusion team at DiversityAndInclusion@stah.org.

10. Training

Training is available for Managers. Further resources and support are available from the manager's toolkit and HR Services team. An e-learning module for Equality, Diversity and Human Rights is available via SAP and all employees are expected to complete this.

11. References to Legislation and Best Practice

Equality Act 2010. 2021. Equality Act 2010. [ONLINE] Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents>. [Accessed 4 December2024].

12. Exception Process

Please refer to the exception process [Policy and Procedure Exception Application Link](#)

13. Key changes

Version Number	Date	Revisions from previous issue
v1	Sept 21	Reviewed and in new procedure format transfer. Refer to v12 for previous version.
2.0	Feb 25	Full Review of Policy Move to new policy template Definitions reviewed Addition of Network information
2.1	May 2025	Added a link to the Menopause Policy
2.2	August 2025	Added the risk statement to the monitoring section