

W3 - Equality and Diversity Policy for Young People & Learners

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What laws or legislation impact on this policy	The Equality Act 2010
Next review date due:	August 2026

1. Centrepont policy

- 1.1 Centrepont is committed to the promotion of equality and diversity in all areas of our work. We will ensure that young people, learners, staff, locum volunteers, visitors and others are able to achieve their full potential in an atmosphere which is free from prejudice, discriminatory behaviour or fear of harassment.

- 1.2 In fulfilling our role as a supported housing provider, training organisation, campaigning organisation and an employer, Centrepont ensures that we treat all individuals with protected characteristics fairly regardless of, but not limited to, age, disability, race, colour, nationality, ethnic origin, immigration status, socio-economic background, ability, caring/dependents status, age, gender, gender identity, gender reassignment, sex, sexual orientation, religion or beliefs/lack of religion or beliefs, pregnancy and

maternity, marital status, appearance, HIV or AIDS status, offending background, or any other matter which causes a person to be treated with injustice.

- 1.3 No individual will receive less favourable treatment on the grounds of their personal or social characteristics, and we will take steps to identify and proactively challenge any form of discrimination.
- 1.4 Centrepont proactively seeks to understand and respond to the needs of all young people, learners and staff we support and work with, through assessment of needs and risk. This incorporates the views and priorities of the young people, learners and staff.
- 1.5 Centrepont Skills & Employability Directorate is committed to removing barriers to accessing learning. If any young person has a disability or any other circumstance which makes it difficult for them to undertake study-related tasks, they will receive additional support, so that they are not disadvantaged.
- 1.6 We endeavour to foster and promote mutual respect and appreciation of diversity in our community. Centrepont operates a zero tolerance approach to all forms of harassment.
- 1.7 We outline the expected standards of behaviour within our services to all staff, young people, learners, volunteers and visitors.
- 1.8 Centrepont is committed to continuous improvement so all equality issues are addressed and practice is reviewed to prevent re-occurrence.
- 1.9 The Equality and Diversity policy, and others if requested, will be available in different formats, such as languages, large print and recorded upon reasonable request.

2. Purpose

- 2.1 This policy and the accompanying procedures will;
 - Outline our equality values and practice in our direct work with young homeless people,
 - Meet our duties as a registered provider of social housing and training,
Help staff to understand the diverse needs of young people and learners, helping them to tailor any required support appropriately.
- 2.2 Centrepont complies with relevant regulations and codes of practice, and this policy has been devised referencing the requirements of funding agencies, awarding bodies and quality standards e.g. The matrix standard, also including:
 - 2.2.1 Homes England and the Regulator of Social Housing – Regulatory Framework
 - 2.2.2 Equality and Human Rights Commission – Equality Act Codes of Practice and Technical Guidance.

3. Scope

- 3.1 This policy is aimed at all members of the Centrepont community which is made up of, but not limited to, staff, locum, volunteers and trustees, however it is specifically relevant to staff and volunteers working directly with young people and learners.
- 3.2 This policy complements Centrepont's Equal Opportunity Policy, primarily covering employment requirements.

4. Definitions

- 4.1 **Equality and diversity:** The recognition that individuals have the right to equality (of treatment, access to services, and so on) and respecting and appreciating the diverse nature of our communities.
- 4.2 **Direct discrimination:** Occurs when a person is treated less favourably than another person in comparable circumstances is, or would be, treated because of their difference (i.e. age, disability, gender, ethnicity etc.). *(Adapted from the Equality Act 2010: What do I need to know? A summary guide for voluntary and community sector service providers)*
- 4.3 **Indirect discrimination:** This means that a condition or practice is applied that adversely affects a considerably larger proportion of one group than the others and it is not justifiable to apply that condition or practice. *(Adapted from the Equality Act 2010: What do I need to know? A summary guide for voluntary and community sector service providers)*
- 4.4 **Harassment:** Participating in, allowing or encouraging behavior that offends someone or creates a hostile atmosphere e.g. the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. *(Adapted from the Equality Act 2010: What do I need to know? A summary guide for voluntary and community sector service providers)*
- 4.5 **Victimisation:** This means treating someone less favourably than others because they have, for instance, complained of discrimination or they have assisted someone else to do so.
- 4.6 **Unconscious Bias:** This means individuals or groups can hold social stereotypes about certain groups of people that individuals form outside their own conscious awareness, which can lead to any or all of the above unfair behaviours.

5. Risk factors

- 5.1 The primary risks of not managing equality matters effectively are;
- 5.2 **Risks to young people and learners:**
- 5.2.1 A lack of understanding and respect of equality and diversity amongst young people and learners which may lead to conflict or unfair treatment of another.
- 5.2.2 Long-term effects on health and well-being as a result of abuse, discrimination, harassment or victimisation.
- 5.2.3 Barriers to young people and learners, resulting in a lack of fair access to services, education and equal opportunity to benefit from these.
- 5.3 **Risks to staff and volunteers:**
- 5.3.1 We expect that all staff and volunteers proactively challenge any form of discriminatory behaviour, regardless of their own personal beliefs. Failure to do so could result in discriminatory practice, leading to disciplinary action and or prosecution.
- 5.4 **Risks to the organisation**
- 5.4.1 As a housing and support provider and a training organisation, Centrepont has statutory, regulatory and legal duties to comply with the Equalities Act 2010. Failure to do so could result in damaging outcomes for the organisation including;

5.4.2 Allegations of Discrimination,

5.4.3 Reputational and financial damage,

5.4.4 Loss of contracts and/or funding, which would ultimately lead to the closure of services.

6. Participation statement

6.1 Centrepont is committed to involving young people, learners and key stakeholders in how we manage and improve our direct services. At a future date, when this policy or procedure is reviewed, we will consult and involve young people, learners and stakeholders to consider their views.

7. Commitment to review

7.1 This policy, its accompanying procedures and any supporting documents will be reviewed every three years or sooner where any changing legislation has an impact.

8. Commitment to equity and inclusion

8.1 Centrepont is committed to creating an organisation where people flourish. By establishing trust and challenging with bias, both conscious and unconscious; we are committed to promoting equity, diversity and transparency in all of our day-to-day actions endorsing inclusive process, practice and culture. We want Centrepont to be a welcoming environment where individual difference is celebrated in the spaces where we live and work.

B) Accompanying Procedure

Procedure title:	Equality and Diversity Procedures
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Approved by:	Director of Services
Supporting documents:	Equality and human rights commission guidance Equality and diversity leaflet (W3 SD1)
Training that supports the application of these procedures:	<ul style="list-style-type: none"> • Equality and Diversity • Equality and Diversity for managers • Domestic violence • Safeguarding awareness • Safeguarding designated persons
Next review date due:	September 2023

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1. Key responsibilities

1.1 All staff are responsible for:

- Having an awareness of and being trained in equality and diversity practice (mandatory),
- Adhering to all equality and diversity legislation and complying with regulatory requirements,
- Challenging and preventing any discrimination, harassment or inappropriate behaviour within services, offices and all Centrepont workspaces including non Centrepont environments where Centrepont work is being carried out.

1.2 In addition, all managers are responsible for:

- Recruiting and training staff to work within equality and diversity legislation and regulatory requirements,
- Planning and monitoring services in line with equality & diversity practice.

- 1.3 In addition, **all senior managers** and the **Senior Executive Team** are responsible for:
- Management oversight of equality and diversity practice in Centrepoint,
 - Taking action to ensure anomalies are addressed.
- 1.4 The **Centrepoint Board** are responsible for:
- Overall monitoring and assessment of equality and diversity practice within Centrepoint, and ensuring compliance with required standards.

2. Detailed procedures for Equality and diversity

2.1 The following gives an overview of guidance for operating within some key business areas.

2.2 Anti-Discriminatory practice

2.2.1 Centrepoint is opposed to all forms of discrimination, victimisation and harassment. To this end we consider, amongst other things, the following to be unacceptable and will address them if they arise:

- The use of verbal comments, innuendo or humour which may give rise to insult or offence,
- Offensive gestures,
- Bringing onto the premises and/or distributing materials, which may incite discrimination,
- The use of social networking sites, email or text messages to convey verbal abuse or display offensive images,
- Any displays of offensive items, posters or other images or text,
- Written comments including graffiti liable to offend or insult others,
- Making threats against individuals or groups,
- Inappropriate and/or unwelcome physical contact,
- Any form of relationship violence/abuse.

2.2.2 Centrepoint will treat all incidents of discrimination and harassment with a zero-tolerance approach and will deal with them using the appropriate policies by:

- Offering an immediate response, including sanctions such as warnings, evictions or immediate removal from training programmes (depending on the severity/frequency of the incident),
- Offering mediation between victims and perpetrators to educate each other about feelings and promote acceptance and understanding to enable more harmonious relationships going forward,
- Ensuring young person attend relevant Lifewise courses on equality and diversity,
- Providing ongoing 1-1 support to raise awareness and educate on topics such as sex and sexuality supporting victims in dealing with the complaint, including reporting to the police and accessing victim support,

- Involving relevant external specialist organisations in educating perpetrators and supporting victims of discrimination/harassment,
- Maintaining full records of all such incidents, regularly reviewing them and taking action to prevent reoccurrence,
- Seeking to develop good practice to eliminate further occurrences,
- Working in partnership with local organisations such as the police, Safer Neighbourhoods Teams and Hate Crime units to develop strategies to reduce further occurrences.

2.2.3 In the event of an incident, the following policies can be consulted to offer next step guidance: Anti-social behaviour policy (provides guidance on how to report incidents of harassment and appropriate actions to take).

- Warnings and evictions policy (to be used if the behaviour warrants such sanctions),
- Complaints & feedback policy (which is explicit in how to report discrimination and should be offered to victims if they wish to formally report their experience),
- Managing and reporting incidents policy (all incidents of discrimination, harassment etc. should be recorded and reported at all times).

2.2.4 Some simple equality and diversity measures for colleagues to consider might include;

- When arranging events for young people and learners – is the event inclusive and are there any special dietary needs?
- When young people and learners are referred to Centrepont – is the process inclusive and fair to all who come into contact with the service?
- When young people and learners begin using a service, either give them a Welcome Handbook (if it is accommodation), or other service information to let young people and learners know what they can expect from us and what is expected of them whilst using a Centrepont service. Ask the young person or learner if they want it in another format or language.

3. Educating and supporting young people about equality & diversity

3.1.1 Centrepont supports young people and learners to understand equality and diversity issues through our support model and through Lifewise.

3.1.2 The Welcome Handbook has a statement on equality and diversity for young people and those in our accommodation services are asked to sign the Support Agreement, which states that they agree to follow the equality and diversity statement in the Welcome Handbook.

3.1.3 A range of information on equality and diversity is available in services, including posters on equality and diversity, harassment and anti-social behaviour and an **Equality & Diversity leaflet** (W3 SD1), which can be given to young people and learners.

3.1.4 Colleagues should develop and use partnership working with a range of external organisations and services (for example, domestic violence/abuse support, LGBT support, religious and cultural agencies, hate crime organisations, young carers

support, etc.), to offer specialised learning and support for equality and diversity issues and promote mutual respect amongst the community.

3.1.5 Young people and learners are encouraged to feedback any concerns they have on equality and diversity issues to staff.

3.1.6 Equality and diversity education is available to all young people through Lifewise and various cultural activities organised across services (such as Black History Month and Refugee week).

4. Equality planning, target setting and monitoring

4.1 Managers should lead their services to;

- Consult young people and learners on equality issues and include equality improvement actions in their annual work plans and review progress quarterly,
- Include equality and diversity on team meeting agendas,
- Target 'hard to reach groups' in the local area.

4.2 Fair Access – referrals & acceptance; access to information and advice; and fair exit

4.2.1 Referrals and Acceptance - We want to ensure that:

- Referrals to our services and subsequent acceptance into the services are proportionate to the profiles of homeless people within the local area,
- The method of referral or way of presenting the service does not raise barriers to accessing the service,
- We find out the most relevant communication methods for each young person and these are used at every stage of the referral and assessment process. Examples of preferred communication methods would include:
 - Verbal communication,
 - Use of an interpreter,
 - Sign language,
 - Documents in BRAILLE,
 - Documents in large font.
- The assessment processes are outlined in our documentation and procedures, and all young people are made aware of them. Staff must ensure that all young people are informed of the appeals process and there is a fact sheet provided to help young people understand this, which should be used at all times.
- Young people and learners must be informed that they can request an interpreter.

5. Access to information and advice

- All young people should receive a Welcome handbook or service information, which is written in plain English and sets out both what they can expect from the service and what the expectations are. Alternative formats can be offered to young people according to their needs (e.g. translation or BRAILLE).
- Posters in services can also be translated and a variety of these already exist (see Translations library),

- In addition, the subject matter should be sensitive to the target audience. For example, information on domestic violence support should be made available in such a way that a perpetrator is unable to restrict the access,
- In all cases, colleagues can offer translation and interpretation services to any young person where required.

5.1.1 Fair exit from a service

- All young people should be made aware of the grounds Centrepont uses for terminating a service through the Welcome handbook, service information, occupancy agreement or various policies.
- When terminating a service, for whatever reason, staff should follow these policies and procedures as appropriate:
 - Rent arrears,
 - Warnings, Notices and evictions,
 - Possession proceedings,
 - Abandonment,
 - Leaving a service,
 - Moving on,
 - Anti-social behaviour.
- All young people and learners should be made aware of the appeals procedure if they are unhappy with the process.
- When terminating a service, staff should inform young people and learners of how to access advice and other services in the community. Standard templates are to be used when issuing warnings, evictions and rent arrears letters.
- Move on from accommodation services should be addressed with each young person early on through key working. The process should be explained to young people at the assessment, and translation is to be made available where necessary.

5.2 Participation

5.2.1 Participation activities should represent, reflect and appeal to the diversity of young people in Centrepont services. Young people and learners should be encouraged to participate in all aspects of their service and efforts should be made to remove any barriers that may prevent particular groups from doing so.

5.2.2 A range of consultative methods should be employed, such as online/paper surveys, meetings, forums, focus groups and telephone interviews. This will ensure as many young people are consulted as possible and will take into account preferred methods of communication, literacy or language needs, caring responsibilities, religious sensitivities or any other matter that may place a barrier to involvement.

5.2.3 Young people and learners should be consulted on the best ways to target specific communities/groups and ensure their voices are heard.

6. Service delivery

6.1.1 **Celebrating diversity:** Resources are made available to support a range of equality and diversity activities such as Black History Month, and Refugee Week.

Opportunities for community and social activities should be provided for young people to make friends and share common experiences, for example women's or LGBT groups.

6.1.2 Religious/cultural customs: Services should provide dedicated spaces for young people and learners to observe religious/cultural customs, for example, space for prayer.

6.1.3 Meeting cultural/religious/social need: Young people and learners should be supported to meet their cultural, religious or social needs. Colleagues should explore with each young person what these may be and ensure young people have access to a range of mechanisms to do so. For example, through linking in with local agencies or community services, accessing learning opportunities or organising specific activities within Centrepont. These should be well advertised using reasonable methods of communication suitable to all groups.

6.1.4 Considering adaptations: Staff should consider what changes they may need to make to the delivery of the service to give those with disabilities an equal advantage.

6.1.5 Employment, training and education: Here at Centrepont, we aim to bring down barriers to education, and every young person and learner is welcomed and is respected as individuals. We recognise the importance of providing tailored, quality support to all our young people, embracing their differences.

7. Managing and Monitoring Incidents

7.1.1 All incidents involving discriminatory behaviour, harassment or victimisation should be recorded and reported in line with the managing and reporting incidents policy, to ensure that they are dealt with effectively.

7.1.2 Managers should monitor incidents of harassment, bullying, and relationship violence closely to ensure any emerging trends are identified and addressed.

7.2 Complaints & Feedback

7.2.1 Young people and learners are entitled to complain to a service where they perceive unfair or discriminatory treatment. All complaints are investigated and responded to in line with our Complaints & Feedback policy.

7.2.2 Managers should monitor complaints, and pay attention to demographics to protect particular groups of young people (e.g. gay, lesbian, BAME, disabled or any other equality strand)

7.3 Procurement

7.3.1 Centrepont works with a range of external companies and individuals, for example contractors, suppliers and consultants, some of whom come into contact with our young people. They are expected to share and comply with Centrepont's commitment to equality and diversity. To this end, all contractors, suppliers and consultants should be:

- Through the procurement process challenged where they do not adhere to this (and if necessary cease contracts etc.).

7.4 Asset management

7.4.1 Centrepont services should be accessible for young people and learners with disabilities. To this end, Disability Discrimination Act assessments are to be carried out to identify access requirement, which can then be met through reasonable adjustments

to properties, including communal areas. This should also be factored into planned maintenance and redevelopment programmes.

7.4.2 Accurate and up to date records of adapted properties are to be kept to ensure that housing is allocated appropriately in future.

8. Considering Equality in Decision Making

8.1 Centrepoint shall ensure it has due regard to equality considerations whenever significant decisions are made. Centrepoint will always consider the impact of all significant decisions on particular groups, and conduct a equality impact assessment, where appropriate.

9. Recruitment and training requirements

9.1 Centrepoint aims to have a workforce that reflects the diversity of the environment within which it operates. Our website and recruitment adverts outline our equality statement.

9.2 All employees are expected to share and commit to equal opportunities and the value of diversity and we equip them with guidance and training

9.3 In addition, Centrepoint strives to ensure our Board represents and reflects the diversity of the community we serve, and possess the range of skills, knowledge and experience to effectively govern the organisation and ensure it meets its Equality and diversity objectives.

9.4 Once recruited, all staff must receive equality and diversity training as part of their induction.