



Developing an Equal Opportunities Policy

Why Do We Need an Equal Opportunities Policy (EOP)?

An EOP publicly demonstrates that your organisation is committed to making its activities and services accessible. It shows that your group understands that some groups in society face discrimination and outlines what you will do to avoid discrimination all areas of your work. Your EOP should be central to the development and delivery of all activities and services. The purpose of this guide is to help organisations establish, implement and regularly review their EO policies to ensure accessibility of their activities, services, governance and employment opportunities.

What Are Some of the Benefits of Having an EO Policy?

- ✓ It makes your organisation more accountable to its users and assures them that you intend to be accessible and responsive to their needs.
- ✓ It provides a specific framework for Trustees, staff and volunteers to operate in, making it clear what must be done (and not done) to ensure equality of opportunity in the way your organisation functions.
- ✓ You will be more likely to attract diverse trustee, staff and volunteer teams if potential applicants see that you are committed to Equal Opportunities.
- ✓ Many funding bodies will only give money to organisations that operate an EOP.
- ✓ An EOP will help an organisation ensure that it adheres to legislation on equalities in employment and service-delivery.

Our Group Is Only Small. Do We Need an EOP?

Yes. An EOP is just as important for a small project with no paid staff as it is for a large, complex agency. If you provide activities or services to other people, it is important that you state clearly that you will not discriminate when doing so. No organisation can assume that it provides good-quality, accessible services unless it has fully considered the implications of Equal Opportunities and publicly states what it does to challenge discrimination.

Can't We Just Borrow Someone Else's EOP?

It is important that any EOP reflects the specific values, structure, aims, activities and beneficiary group of the organisation. Developing and reviewing an EOP gives the organisation an opportunity to think about how equalities relate to the whole organisation and its work. This is unlikely to happen if you just photocopy someone else's policy and call it your own.

If We Only Offer Services to Women, Are We Discriminating?

Not necessarily. Many organisations provide services for groups that face discrimination e.g. women, Black and minority ethnic communities, lesbians, etc. This recognises that these groups may require specific services and activities to challenge the discrimination they face.

I've Got This Guide, Now What?

The table that follows outlines the sections an EOP should contain and gives suggested text and examples for the first section to give you a feel for what you could write. However, in order to draft your own policies, you cannot simply copy the suggested wording. You could set up a small working group of trustees and staff to consider the issues and devise a draft policy. Others within the

organisation (including volunteers and service-users) can be consulted on the draft so they can also contribute to the formation of a final version to be implemented.

Once a policy is established, it is important to ensure that it is considered in the development of *all* activities and never just filed away. It is also crucial that your EOP is regularly reviewed and updated within your organisation's planning process. This way, your EOP will remain clear, responsive and relevant to the needs of your organisation and those it serves.

	<p style="text-align: center;">Examples of Possible Wording</p>
<p>PART A: Statement of Intent on Equal Opportunities (EO) This section says in a nutshell what your organisation hopes to achieve with its EO policy.</p> <p>1. Positive Action. If you work with or for a specific group facing discrimination, the statement of intent can start with a sentence declaring your commitment to the particular community that you serve. If not, it can say that you recognise many groups face discrimination and that you aim to challenge this.</p>	<p>The “Great Women’s Group” recognises that women are specifically disadvantaged in society and aims, through its activities and services, to improve the situation for women.</p>
<p>2. Recognising Discrimination. It is important to state that your organisation is actively opposed to all forms of discrimination. It should include a full list of the grounds for discrimination. This does not imply that you provide services aimed at each of the groups mentioned in the list. It simply demonstrates that your organisation has a clear understanding of the mechanics of discrimination and commitment to addressing it.</p>	<p>We actively oppose all forms of discrimination on the grounds of age, appearance, caring responsibilities, caste, class, culture, gender, HIV status, immigration status, long term illness, marital status, nationality, physical and/or mental ability, political views, religion, race/ethnicity, sexuality, unrelated criminal convictions or trade union involvement.</p>
<p>3. What You Will Do. This should highlight what your organisation will do to provide accessible activities and services, mindful of the discrimination that many groups of people face, both direct and indirect discrimination (see glossary). The provisions you make will depend on your resources. Therefore, it is useful to include a statement that you will try to secure funds to improve accessibility.</p>	<p>Our organisation will take steps to challenge direct and indirect discrimination in our management, employment practice, volunteering practice and service delivery. We are committed to securing funds for the continuous improvement of accessibility in our organisation.</p>
<p>4. Representation. This statement describes a commitment to ensuring that your trustees, staff, volunteers and users reflect the community that you serve. This will also help ensure that your activities and services are sensitive to and reflect the needs of the community served.</p>	<p>We strive to ensure that the composition of our trustee, staff, volunteer team and user group reflects the diversity to be found within the community of users we serve.</p>
<p>5. Feedback. Finally, explain what someone can do if they do not think your group has lived up to the values or intention of its EOP. This could be through the use of a Complaints Procedure for feedback from users and a Grievance Procedure for trustees, staff and volunteers to use. This will depend on the processes your organisation uses for gaining feedback and dealing with complaints.</p>	<p>If someone believes our organisation is not meeting the aims set out in this policy, we encourage them to use our Complaints Procedure (if they are service users or members of the public) or Grievance Procedure (if they are trustees, staff or volunteers.) Copies of these procedures can be obtained from the address at the top of this policy.</p>

PART B: Policy on Activities and Services

In this section, your organisation describes in detail what it will do to make its activities and services accessible.

1. Breaking Barriers.

This section should give examples of how you strive to overcome barriers to accessibility of your services which will depend on what your organisation actually does. You may wish to "bullet point" each. These might include providing information leaflets in large type, advertising your activities in the Black and Minority Ethnic media, offering crèche facilities during meetings, providing community language interpreting or having a wheelchair accessible office.

2. Monitoring.

Who are your service users? What are their needs? What steps do you take to find this out? What do you do with the information gained? In this section, explain what you will do to answer these questions. These might include keeping track of how many people attend drop in sessions, logging the most common types of enquiries you receive, asking users to complete anonymous questionnaires with details of gender, ethnic origin, disability status, etc. State how you will use the information – for planning sessions, to target services to people who don't currently use them, etc.

3. Consultation.

How do you involve users in planning and evaluating your activities and services? How do you know you provide what they want? Are you providing good-quality services? In this section, explain what you do to answer these questions. These might include giving a satisfaction questionnaire to your users every month, gaining feedback from a group meeting of service users or encouraging visitors to contribute to a suggestion box. As with monitoring, explain how you use information gained to improve your activities and services.

4. Policy and Campaigning.

Does your work involve challenging discrimination through campaigning, lobbying or influencing policy? Are you involved in wider networks that are trying to do this? Do you use the experiences of your service users as evidence to argue for changes in policy? In this section, highlight the work you do to address discrimination in wider society. These might include a list of your activities that involve challenging social, economic or political factors that discriminate, that you will work for change by networking with other organisations on mutual campaigns or that you will make submissions on behalf of your users to the local authority.

5. Challenging Discriminatory Behaviour.

What do you do if one of your users behaves in a discriminatory way? How do you support your staff and volunteers in challenging such a user? Do you refuse your services to users who are persistently threatening or discriminatory in their words or actions? What happens if you experience discriminatory behaviour from another agency? These might include steps like having a Code of Conduct for your users, training and supporting staff and volunteers on how to challenge threatening or discriminatory behaviour, excluding users who are persistently abusive or making formal complaints against other organisations where they are seen to behave in a discriminatory way.

PART C: Policy on Recruitment and Selection.

In this section, your organisation describes in more detail what it will do to ensure accessibility of employment. If you do not have paid staff, you could just include a statement of intention to set up EO policies on recruitment and selection if you employ staff in future.

1. Job Specifications.

It is good EO practice to use job descriptions and person specifications in recruitment to make the process as objective as possible. State in this section that you use these tools and that you will work to ensure that you do not set requirements in them that are likely to discriminate against people unless this is essential for the post. (e.g. full driving license, Social Work qualification, typing speed of 50 wpm, shift working required, etc.)

2. Publicising Vacancies.

It is good EO practice to advertise jobs as widely as possible within your budget. The law prohibits discrimination on the grounds of gender, race or disability, but it does not permit restricting posts to a specific group of people, even if this is intended to enhance the diversity of the staff team. It *is* possible in limited cases to restrict posts to a specific group of people and this must be stated clearly in publicity for the job. Seek further information on "Genuine Occupational Qualifications" before advertising posts as such. (See glossary). State in this section how you will publicise job vacancies (i.e. advertisements in the minority ethnic press, inserts in mailings of disability organisations, via job centres, etc.) If you *do* restrict any posts to a certain group of people as "Genuine Occupational Qualifications," explain that you do so within the law.

3. Application Form and Pack.

It is important to provide sufficient materials to enable someone to complete the application. Make sure you provide the same information materials in all application packs. It is good EO practice to use application forms with a detachable front sheet with the person's name, address and personal details on it. This means that the recruitment panel will not have details of the name, gender, etc. of candidates when short listing. *Remember: it is not* good practice to select candidates by CV. State here what you will include in an application pack. This might be a covering letter with the closing date, the job description, person specification, EOP, annual report or other information on your group, an application form and a confidential EO monitoring form.

4. Recruitment Panel.

Panels should consist of people with relevant knowledge and expertise to assess candidates by application and interview. They are generally drawn from staff and trustees, with outside specialists if additional expertise is needed. All should have adequate knowledge or training in EO recruitment practice. As far as possible, they should reflect the diversity of the workforce your organisation wishes to achieve. It is best to have an odd number on the panel to ensure a majority decision if there is no consensus. State here how you will set up your recruitment panel, how you will ensure they are suitably prepared for the task and how you will strive to ensure its composition reflects the workforce you want to have in terms of gender, ethnicity, age, ability, sexual orientation, etc.

5. Shortlisting.

This should be based on the essential criteria from the person specification. Go through the responses for each applicant and assess them according to how well they meet each point in the person specification. Each candidate should be marked on the basis of a consistent scoring system (e.g. 0 = criteria not met, 1 = partially met, 2 = adequately met, 3 = exceptionally met.) Where possible, the same people should shortlist applications and serve on the interview panel. State here that it is your practice to shortlist against the person specification. Explain the system you will use for scoring.

6. EO Interviewing.

Questions should be based on the person specification and the panel should agree in advance what points they are looking. A template of questions and expected responses with spaces for writing in a candidate's answers and scores should be created. Each panel member should complete a form

for each candidate. Candidates should all be questioned in the same way, but it may be necessary to repeat or rephrase questions to obtain the information needed. Organisations may use additional methods for assessing candidates at interview, like asking them to conduct an exercise or make a presentation to the panel. As with the questions at interview, the panel should know what they are looking for from the candidate and score them according to how well they met this standard. State here how you intend to set the interview questions and (if applicable) assessment exercises and the procedure you will use during the interview to ensure consistency between candidates.

7 EO Monitoring.

Obtaining information on the profile of applicants will tell you how well you have targeted your recruitment publicity. An anonymous form should be included in the application pack. Candidates can describe gender, age, ethnic origin, disability status and other information to help determine the profile of applicants. The form can also ask how applicants heard of the post to give an idea of the effectiveness of your recruitment publicity. It is good practice to let applicants know they can "opt out" of questions if they wish to. State here that you will ask applicants to complete an anonymous EO monitoring form as part of the application process. State that the form will be separated from the application and form no part in the selection process. Explain how your organisation will use the information supplied in the form (e.g. for targeting future recruitment publicity.)

PART D: Conditions of Service.

In this section, explain the provisions you make to improve accessibility in employment opportunities through the terms and conditions of service you offer. If you do not have paid staff, you could just include a statement of intention to ensure EO in employment, if you employ staff in future.

1. Provisions of the Job Contract.

All paid staff should be issued with a job contract upon commencement of their employment. Some of the provisions are required by law and others are examples of good practice. Your organisation's financial resources may determine how "generous" the good practice terms and conditions can be. State here that paid staff will be given contracts of employment. Highlight the sections of the contract that promote accessibility of employment opportunities in your organisation. This might include time off for religious or cultural holidays, trade union membership, training opportunities, enhanced maternity, parental and adoption leave, compassionate leave, etc. It should also state that implementing your EO policy is a condition of employment for staff.

PART E: Volunteers.

In this section, explain how you ensure the accessibility of your volunteering programme and the steps you will take to ensure the volunteer team reflects the diversity of your user group. If you do not have volunteers, this section can be omitted, but should be added as soon as you begin the process of using volunteers. State here how you will ensure accessibility of your volunteer programme. This might include having agreed volunteering policies and procedures, an explanation of how you will publicise volunteering opportunities, the training and support you will give volunteers, that you will reimburse travel, meal and childcare costs for volunteers, how volunteers can give feedback, etc. It should also state that implementing your EOP is a condition of volunteering for your organisation.

PART F: Trustees.

In this section, explain how your organisation ensures accessibility in opportunities to serve as a trustee. It should also explain the steps you take to ensure the trustee group reflects the diversity of your user group. State here how you will ensure accessibility of trustee opportunities. This might include steps similar to those for using volunteers above. Remember to include any provisions related to EO and trustees contained within your constitution in this section. It should also state that implementing your EOP is a condition of service as a trustee.

PART G: Developing, Monitoring and Reviewing the EO Policy.

It is important to describe here how your organisation will ensure that its EO policy is relevant and remains up to date. This will depend on your organisation's structure, planning process and how decisions are made. State here who will be responsible for developing, monitoring and reviewing the policy (e.g. trustees, Co-ordinator, Team Leaders, etc.), how this will be done and how often it will take place.

Glossary

Direct and Indirect Discrimination:

Direct discrimination involves an obvious attempt to discriminate against people from a certain group. This would include examples like a "No travellers" sign in a restaurant. Most direct discrimination is illegal.

Indirect discrimination does not explicitly discriminate against a group of people, but in effect, means that some groups of people will not be able to access a service or opportunity. Examples might be a drop in centre that is only open in the evening which would make it inaccessible to many people with care responsibilities or providing documents only in small typeface so they cannot be easily read by a person with a visual impairment.

Institutional Racism is a term identified by the Inquiry into the murder of Stephen Lawrence as *The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture, or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantages minority ethnic people.* Similarly, many other groups face indirect discrimination which is institutional. Institutional discrimination can exist within voluntary and community organisations just as it can in larger public and private sector bodies.

Genuine Occupational Qualifications (GOQs)

Generally it is illegal to specify that a job is for a particular section of society – for example, women-only. However, there are exceptions to these rules if you can demonstrate that the role needs to be filled by a particular type of person. For example, with colour or nationality if you can demonstrate that the role you are advertising is to provide personal services to people from a particular racial group in connection with their welfare, which only a person of the same colour or nationality can do most effectively, then you can say that this is a Genuine Occupational Qualification. For information on the law regarding GOQs, visit the websites of the Equal Opportunities Commission www.eoc.org.uk, the Commission for Racial Equality www.cre.gov.uk or the Disability Rights Commission www.drc-gb.org. These sites also offer a range of information resources on equal opportunities issues.

Model Application Forms and Equal Opportunities monitoring forms are available from the WRC.

Useful website:

Equality and Human Rights Commission - <http://www.equalityhumanrights.com>

ACAS - <http://www.acas.org.uk/>

Directory of Social Change: www.dsc.org.uk

National Council for Voluntary Organisations: www.ncvo-vol.org.uk

Race on the Agenda: www.rota.org.uk

Scottish Council for Voluntary Organisations: www.scvo.org.uk

Volunteering England: www.volunteering.org.uk