



# **EQUALITY, DIVERSITY AND INCLUSION POLICY and PROCEDURES**

**Jerry Froggett, Chief Executive Officer**

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**Cintra Language Services Group Ltd**

## **1 Scope**

This policy applies to services provided by Cintra and to the recruitment, selection, training, promotion, discipline and dismissal/de-registration of Cintra's employees, linguists (irrespective of employment status) and non-executive directors.

It is linked to Cintra's Bullying and Harassment Policy.

## **2 Aims**

This policy demonstrates our commitment to equality, diversity and inclusion and our aim to incorporate these into all areas of our work.

We aim to ensure that Cintra facilitates the goals of our public service providers to meet their public sector equality duties under the Equality Act 2010 and the needs of their local communities.

We aim to provide services to our clients and members of the public which are non-discriminatory. We aim to create a working environment in which:

- all people are able to give of their best
- there is no bullying, harassment or discrimination
- all decisions are based on merit.

## **3 Statement of intent**

We are committed to ensuring, within our span of control, that no existing or potential service user, service provider, employee, linguist or director receives less favourable treatment or service than any other on the grounds of age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender or sexual orientation.

However, information on the gender or religion/belief of our interpreters may be used to better meet service users' needs, for example when requests for same-sex interpreters are made.

We recognise that a policy will not in itself provide equality, diversity and inclusion. Cintra therefore will seek to eliminate direct or indirect discrimination in its practices, and in the provision of its services. Cintra will also promote equal opportunities and attitudes and policies which reinforce equality.

## **4 Responsibilities**

Every employee, linguist and director has personal responsibility for the implementation of this policy. They should not behave towards colleagues, service providers or service users in a way that could be interpreted as unlawful discrimination, victimisation or harassment. This applies not only to conduct during working time, but also during work-related social events and to any interaction Cintra personnel may have with service providers or service users while representing Cintra.

The Chief Executive is responsible for ensuring the implementation of the policy. Responsibility for the day-to-day operation of the policy rests with Cintra's Head of Business Operations.

Cintra's Chief Executive is responsible for ensuring our contracted clients are aware of the policy.

## **Harassment**

Harassment is unwanted behaviour that has the purpose or effect of violating a person's dignity or creates a degrading, humiliating, hostile, intimidating or offensive environment.

Cintra will not tolerate harassment or unlawful discrimination in any form, including (but not exclusively):

- Verbal insults and ridicule
- Banter, taunts or comments
- Graffiti, literature or any form of written / electronic communication
- Shunning individuals

in relation to age, disability, gender, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender or sexual orientation.

## **Victimisation**

Cintra will not tolerate victimisation.

Victimisation occurs where an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so.

## **5 Working together with our contracted public sector service providers**

We wish to support our public service providers in their efforts to meet their equality duties and the needs of differing local communities.

Cintra's activities may include:

- Increasing the supply of linguists.
- Using service providers' knowledge and contacts in order to publicise recruitment opportunities more widely.
- Obtaining advice from service providers in identifying our linguists' training needs and training them in equality and cultural matters. Cintra's linguists and trainers may also assist in the education of service providers.

We expect our contracted service providers to inform their staff, service users and members of the public that harassment of workers will not be tolerated and take reasonable steps should someone harass a Cintra interpreter during the course of their duties.

## **6 Procedure**

### **6.1 Policy and decision making**

When policies, procedures and practices are created or reviewed we will ensure they are not potentially discriminatory and take into account the implications for promoting or maintaining equality, diversity and inclusion for service users, employees, directors, interpreters and translators.

## **6.2 Access**

Cintra will endeavour to make its premises physically accessible to everyone, address communication problems and provide a welcoming atmosphere.

## **6.3 Outcomes of breaching the equality policy**

The following action may be taken against those who are found to be in breach of the policy.

- Employees - disciplinary action, including dismissal
- Linguists – de-registration from Cintra
- Directors – disqualification and removal from Board.

## **6.4 Raising concerns**

Service providers, service users and members of the public may raise concerns through the service provider's or Cintra's Complaints Procedure.

Any employee, linguist or director who believes he or she is being discriminated against, victimised or harassed should raise the matter through Cintra's Harassment and Bullying Procedure. Employees may also use the Grievance Procedure.

We aim to treat concerns seriously and deal with them in a timely and sensitive manner.

We aim to ensure that staff, linguist and directors are comfortable about raising such complaints. No individual will be penalised for raising such a complaint unless the substance of the complaint is proven to be false or the complaint is made in bad faith, for example out of malice.

Any employee who makes a false accusation of harassment will be subjected to disciplinary action. In serious cases, such behaviour may be deemed to constitute gross misconduct and may result in summary dismissal. Likewise, any linguist who makes a false accusation of harassment may be de-registered. A Director who makes a false accusation of harassment may be removed from the Board.

Where an employee is falsely accused of discriminatory conduct, he or she may implement Cintra's Grievance Procedure.

## **6.5 Recruitment and employment practices**

Cintra will apply the principles stated above to its recruitment, training, promotion, and discipline of staff, linguists and directors, including the processes involved in the termination of employment (dismissal or selection for redundancy) and de-registration.

When we are recruiting, we will ensure the criteria for selection are job-related, and will use a range of methods to advertise vacancies in order to facilitate open recruitment.

We will monitor the diversity of all employees, directors, linguists and job applicants. All employees, linguists, directors, and job applicants will be asked to complete an optional equality monitoring form when joining Cintra. The information collected will be used for the purpose of monitoring the effectiveness

of the Equality, Diversity & Inclusion Policy. It will not be used for short-listing purposes.

Personal information such as age and marital status may need to be provided by applicants for vetting purposes (DBS and police vetting). This information will not be used for short-listing purposes.

The policy will be followed in the practice of providing references.

## **6.6 Disability**

### **a) Recruitment**

Job application forms and requests for references will not ask any questions about disability, health conditions or sickness absence.

The equality monitoring form issued at recruitment will include a question to find out if the applicant needs reasonable adjustments for the recruitment process, such as for an assessment or interview. Any information supplied will not be used for short-listing purposes.

Questions about an applicant's health or disability may be asked once a job offer has been made, to ensure that his/her health or disability would not prevent him/her from doing the job. Reasonable adjustments that would enable him/her to do the job will be considered.

### **b) Employment**

Employees who are disabled or become disabled in the course of their employment should inform their line manager about their disability. Management will then arrange to discuss with the employee what reasonable adjustments to his or her job or working conditions or environment might assist him or her in the performance of his or her duties. The employee will also be encouraged to suggest any adjustments that he or she believes would be helpful. Careful consideration will be given to any proposals and, where reasonable and reasonably practicable such adjustments will be made. There may, however, be circumstances where it will not be reasonable or reasonably practicable for Cintra to accommodate proposals put forward by the employee.

### **c) Caring responsibilities**

Employees who need time off work to care for a disabled child, partner or parent should discuss the matter with their line manager. See the Flexible Working Policy or Special Leave Policy.

## **6.7 Education and training**

Cintra will regularly promote awareness of its Equality, Diversity & Inclusion policy and practices through training and information for directors, managers, staff, interpreters and translators. This will include promoting greater awareness of the differing needs of those from different backgrounds and by valuing different cultural identities, outlooks and life choices.

All managers responsible for recruitment and employment decisions will receive training in equality, diversity and inclusion and the avoidance of bias.

Anti-discriminatory values will be integral to all professional codes of conduct, policies and practices implemented by Cintra.

We will circulate our Equality, Bullying & Harassment, Grievance, Interpreter/Translator Performance policies and Interpreter Raising Concerns procedure to our employees, linguists and director as appropriate.

We will raise awareness and provide guidance to our managers, employees, linguists, directors on the Equality, Diversity & Inclusion Policy and on their responsibilities under the law, for example in the staff and linguist handbooks, and as part of induction and CPD training.

## **6.8 Monitoring and review**

This policy will be monitored on a regular basis by the senior management team. This will include review of monitoring data, feedback/concerns from staff and any incidents that may have occurred. Where there are issues with the way the policy is working, these will be looked at closely with a view to identifying measures to improve the effectiveness of the policy.

The policy and the effectiveness of its implementation will be reviewed annually by Cintra's Board.

## **DEFINITIONS**

<b>protected characteristics</b>	These are the grounds upon which discrimination is unlawful. The characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
<b>direct discrimination</b>	Less favourable treatment of a person compared with another person because of a protected characteristic.
<b>indirect discrimination</b>	the use of an apparently neutral practice, provision or criterion which puts people with a particular protected characteristic at a disadvantage compared with others who do not share that characteristic, and applying the practice, provision or criterion cannot be objectively justified.
<b>associative discrimination</b>	Discrimination against someone based on their association with someone with a protected characteristic (marital and civil partnership status are excluded from this provision).
<b>perceptive discrimination</b>	Direct discrimination against someone because they are thought to possess a particular characteristic which they do not have (marital and civil partnership status are excluded from this provision).
<b>harassment</b>	Unwanted behaviour that has the purpose or effect of violating a person's dignity or creates a degrading, humiliating, hostile, intimidating or offensive environment.
<b>victimisation</b>	Subjecting a person to a detriment because they have done a protected act or there is a belief that they have done a protected act, i.e., bringing proceedings under the Equality Act; giving evidence or information in connection with proceedings under the Act; doing any other thing for the purposes or in connection with the Act; alleging that a person has contravened the Act.
<b>public sector equality duty</b>	the duty on a public authority when carrying out its functions to have due regard to the need to eliminate unlawful discrimination and harassment, foster good relations and advance equality of opportunity.