

## Equality, Diversity and Inclusion policy

### Document status

<b>Abstract</b>	This document outlines the Commission's approach to encouraging, managing and valuing diversity and our commitment to including and providing equality for all
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<b>Author</b>	EDI Working Group
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### Related documents

<b>Related legislation</b>	<ul style="list-style-type: none"> <li>• <a href="#">Equality Act 2010</a></li> <li>• <a href="#">Equal Pay Act 1970</a></li> <li>• <a href="#">Health and Safety at work Act 1974</a></li> <li>• <a href="#">Employment Rights Act 1996</a> (as amended by the Employment Act 2002)</li> <li>• <a href="#">The Human Rights Act 1998</a></li> <li>• <a href="#">Part-time Workers Regulations 2000</a></li> <li>• <a href="#">Public Sector Equality Duty</a></li> </ul>
<b>Related policies/procedures</b>	<ul style="list-style-type: none"> <li>• Dignity at work policy</li> <li>• <a href="#">Learning &amp; development policy</a></li> <li>• <a href="#">Recruitment selection policy &amp; managers guide to recruitment and selection</a></li> <li>• <a href="#">Equal pay policy</a></li> <li>• <a href="#">Job security redundancy policy</a></li> <li>• <a href="#">Maternity paternity and adoption provisions</a></li> <li>• <a href="#">Healthy and safety policy</a></li> <li>• <a href="#">Disciplinary policy and procedure</a></li> <li>• <a href="#">Grievance policy and procedure</a></li> <li>• <a href="#">Whistleblowing policy</a></li> </ul>

## Document revision

Version	Date	Revised by	Purpose of issue	Summary of changes
1.0	Sept 21		New policy	
2	Oct 23	AH	Policy review	Minor amendments
3	Nov 25	AE/AH	Policy review	Adjustments to reflect changes to the review process and to make more externally focused; plus, other general updates to improve clarity

## Document distribution / approval

Title	Purpose
Equality, Diversity & Inclusion Working Group	Biennial review
Leadership Team	Biennial review
Audit & Risk Committee	Biennial review endorsement
Commission Board	For approval of significant changes
All staff and Commissioners	For information (mandatory read upon revision)

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## 1. Our commitment to Equality, Diversity & Inclusion (EDI)

*We believe that an inclusive culture enriches all we do:*

- *We value diversity and the benefits different perspectives and experiences bring to all our work*
- *We are committed to being inclusive in the way we work together and the way we engage with those contributing to our reviews*

Everyone involved in the Commission is responsible for EDI and has a responsibility to exhibit behaviours that promote our EDI values.

We are a disability confident employer and recruit, retain and support in their career development any individuals with protected characteristics under the Equality Act 2010.

### 1.11 Behaviours charter

The dignity at work policy, which includes the Commission’s behaviours charter, sets out our commitment to providing a workplace culture free from hostility, where all employees are valued and enabled to develop to their full potential. A copy of the behaviours charter is available as Appendix D.

## Changes in external environment

The Equality and Human Rights Commission publishes regular updates and has guidance on their website in relation to the Public Sector Equality Duty which is relevant to the Commission. This can be found at [Equality and Human Rights Commission](#)

## Our objectives

Through our Public Sector Equality Duty, we are committed to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited by or under the Equality Act 2010.
- Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Fostering good relations between persons who share a relevant protected characteristic and persons who do not share<sup>1</sup> it

We are committed to ensuring that all our people and job applicants/ candidates are treated fairly in an environment which is free from any discrimination with regards to the nine protected characteristics outlined in the Equality Act 2010.

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (includes colour, nationality and ethnic origins)
- religion or belief
- sex
- sexual orientation

## Our reviews

We are committed to ensuring that equality, diversity and inclusion underpin the decisions taken for fair electoral and boundary arrangements for local authorities in England.

To do this, we ensure that our electoral reviews are carried out with a wide level of engagement across the area that we are reviewing. We seek to ensure that local people, parish and town councils, community groups, and organisations that wish to give us their views are aware of the review and are able to respond meaningfully to our consultations.

We make sure that no individual is discriminated against at any stage of the review process. All review consultation documents and reports are subject to an equality impact assessment under the guidelines set out in Section 149 of the Equality Act 2010 to ensure there are no negative equality impacts as a result of the outcome of the review. We undertake these assessments before the recommendations are presented to the Commission Board for discussion and agreement.

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<sup>1</sup> Objectives from the Public Sector Equality Duty

## 1.12 Working in partnership

We work with local authorities and communities when we conduct our reviews. Councils bring valuable skills and expertise in EDI, and we build on that by using our experience to highlight opportunities to embed EDI in every stage of the review process.

## 1.13 Shared responsibility

Both the Commission and the authorities we review have responsibilities under the public sector equality duty. Councils are skilled and experienced in considering this and are responsible for implementing change arising from reviews. We will support councils by highlighting with them the EDI dimensions to the review process and opportunities that may arise through reviews.

## 1.14 Promoting inclusive outcomes

Consideration of EDI does not determine specific outcomes such as a particular number of councillors for the council or in individual wards. Our proposed electoral arrangements are determined by applying our statutory criteria. Our approach is to encourage and support the implementation of new electoral arrangements by the council in ways that promote fairness, accessibility, and inclusion.

## Our people

We want everyone who works with us, including staff, Commissioners, contractors and candidates, to feel respected and valued. We listen to people's experiences, learn from feedback, and take action to remove barriers so that everyone has the opportunity to develop and succeed. All our people are treated fairly in an environment which is free from discrimination.

We foster an inclusive workplace culture where people from all backgrounds can develop and reach their full potential.

Our people, whether part time, full time or temporary, will be treated fairly and with respect, and in accordance with legislation. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability, and compliant with legislation. All employees will be supported and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Through our people strategy and recruitment processes, we aim to create opportunities and reduce barriers for everyone, particularly in under-represented groups, to ensure we grow and maintain a diverse work force. We monitor equalities data after each recruitment exercise and make recommendations to our Leadership Team on how we could improve our

potential candidate base and where we advertise to reach under-represented groups.

As part of our annual staff survey, we gain the views of staff in relation to EDI and seek to take actions that respond to the views that we hear.

## Equality Impact Assessments

We embed our commitment to EDI in our relevant policies, procedures, working practices, strategies and publications.

All our employment policies and processes are equality impact assessed to ensure there is no negative impact on any of our workers or candidates.

We also undertake equality impact assessments on our electoral reviews, as highlighted above.

## Training and development

We provide annual EDI training for all staff and Commissioners and encourage both groups to be represented on the EDI Working Group (EDIWG).

The EDIWG are encouraged to identify additional training, development and awareness raising opportunities for staff and Commissioners.

## Equality, Diversity & Inclusion Working Group (EDIWG)

The EDIWG meets bi-monthly and consists of at least two EDI Champions, one of whom will be a Commissioner. The EDIWG actively promotes and raises awareness of EDI at the Commission.

The EDI Working Group has responsibility for:

- promoting and raising awareness of EDI issues across the Commission
- identifying and eliminating barriers (cultural, behavioural and procedural) for all our people
- reviewing and contributing to the maintenance of organisational policies relating to EDI
- providing guidance to employees and Commissioners on EDI issues
- identifying additional development and training opportunities in relation to EDI for staff and Commissioners

## Seeking a solution

The Commission has a range of policies and procedures that deal with potential discriminatory behaviour at work including:

- Code of Conduct

- Grievance policy
- Disciplinary policy

These, and other Commission procedures, should be used when appropriate (e.g. where someone is aggrieved about their personal position). The Director of Corporate Services or the HR and Office Manager can advise which would be the most appropriate policy or procedure according to the particular circumstances.

We encourage employees who feel they have been treated unequally or have suffered from or have witnessed harassment, bullying or discrimination to act.

If you are an employee or Commissioner, and you need support to raise an issue, you are encouraged to speak to any of the following:

- your Line Manager
- the staff EDI Champion
- the Commissioner EDI Champion
- the Director of Corporate Services
- the Office Manager/HR Lead
- any other appropriate person

Actions may range from an informal discussion with the people involved, through to a formal complaint managed within the Commission's grievance policy and procedure.

Anyone with a concern about EDI in relation to an electoral review can view our [complaints policy and procedure](#) which contains a section on how you can raise such concerns with us.

## Glossary:

### 1. Protected characteristics

As described by the Equality and Human Rights Commission  
<https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

### 2. Harassment

Harassment is unwanted behaviour that you find offensive, where the other person's behaviour is because:

- you have a protected characteristic
- there is any connection with a protected characteristic (for example, you are treated as though you have a particular characteristic, even if the other person knows this isn't true)

Unwanted behaviour could include:

- spoken or written abuse
- offensive emails

- tweets or comments on websites and social media
- images and graffiti
- physical gestures
- facial expressions
- banter that is offensive to you

Anything that is unwelcome to you is unwanted. You don't need to have previously objected to it.

The unwanted behaviour must have the purpose or effect of violating your dignity, or creating a degrading, humiliating, hostile, intimidating or offensive environment for you.

To be unlawful, the treatment must have happened in one of the situations that are covered by the Equality Act: for example, in the workplace or when you are receiving goods or services.

### 3. Victimisation

This is treating someone badly because they have done a 'protected act' or because an employer, service or other organisation believes that you have done or are going to do a protected act. The reason for the treatment does not need to be linked to a protected characteristic.

A protected act is:

- making a claim or complaint of discrimination (under the Equality Act)
- helping someone else to make a claim by giving evidence or information
- making an allegation that you or someone else has breached the Equality act
- doing anything else in connection with the Equality Act.

### 4. Direct discrimination

This is when you are treated worse than another person or other people because:

- you have a protected characteristic
- someone thinks you have that protected characteristic (known as discrimination by perception)
- you are connected to someone with that protected characteristic (known as discrimination by association)

Your circumstances must be similar enough to the circumstances of the person being treated better for a valid comparison to be made.

If you cannot point to another person who has been treated better, it is still direct discrimination if you can show that a person who did not have your protected characteristic would have been treated better in similar circumstances.

To be unlawful, the treatment must have happened in one of the situations that are covered by the Equality Act. For example, in the workplace or when you are receiving goods or services.

It is possible to be discriminated against by someone who shares the same protected characteristic as you.

If you have been treated worse due to your age, this may be allowed if the organisation or employer can show that there was a good reason for the difference in treatment. This is known as objective justification. If you are treated worse due to any other protected characteristic, it is unlawful direct discrimination whether or not the organisation or employer has a reason for it.

## 5. Indirect discrimination

Indirect discrimination happens when there is a policy that applies in the same way for everybody but disadvantages a group of people who share a protected characteristic, and you are disadvantaged as part of this group. If this happens, the person or organisation applying the policy must show that there is a good reason for it.

A 'policy' can include a practice, a rule or an arrangement.

It makes no difference whether anyone intended the policy to disadvantage you or not.

To prove that indirect discrimination is happening or has happened:

- there must be a policy which an organisation is applying equally to everyone (or to everyone in a group that includes you)
- the policy must disadvantage people with your protected characteristic when compared with people without it
- you must be able to show that it has disadvantaged you personally or that it will disadvantage you
- the organisation cannot show that there is a good reason for applying the policy despite the level of disadvantage to people with your protected characteristic.

If the organisation can show there is a good reason for its policy, it is not indirect discrimination. This is known as objective justification.

# Appendices

## 1.15 EDI Commissioner Champion role description

### **EDI Commissioner Champion role description**

#### **Overall purpose of the EDI Commissioner Champion role**

To support the Board by bringing a Commissioner's perspective to the development and implementation of Equality, Diversity and Inclusion policies and practices, and to promote and embed the Commission's EDI values at all levels of the organisation.

#### **Main responsibilities**

- Have an understanding of how EDI affects the Commission, its staff, Commissioners and wider stakeholders.
- Be a role model, widely recognised as a supporter and champion of EDI at the Commission.
- Be a member of, and liaise with, the EDIWG providing a Commissioner perspective on actions in relation to equality, diversity and inclusion.
- Promote and raise awareness of EDI issues across the Commission and, in particular, at Board level.
- Be a point of contact for staff and Commissioners on EDI issues.
- Ensure EDI is an integral part of internal and external organisational strategy and policies.
- Identify and promote removal of barriers (cultural, behavioural and procedural) for all people in all Commission activities.
- Be empowered to address any negative stereotypes or bias within the organisation and take actions to tackle inappropriate behaviours and actions.
- Keep up to date with the wider EDI agenda and share as appropriate with the EDIWG
- Liaise with other EDI Champion(s) and experts for support and to share good practice.
- Attend EDI training and awareness events as required.

#### **Personal specification**

- Energetic and passionate about equality, diversity and inclusion.
- Ability to listen and understand sensitive situations, demonstrating empathy for diverse people and receptive to the sensitivities relating to protected characteristics.
- Objective.
- Interest in developing strong influencing skills, to face people with different opinions.
- High degree of self-awareness and personal integrity.
- Tenacious and resolute in the commitment to EDI to find new ways to overcome barriers.
- Be receptive to developing skills.

- Appreciation of the value a Commissioner perspective can bring to the EDIWG.

## 1.16 Appendix C – EDI Champion role description

### EDI staff champion role description

#### Overall purpose of the EDI Champion role

To promote and embed the Commission's Equality, Diversity and Inclusion values at all levels of the organisation.

#### Main responsibilities

- Have an understanding of how EDI affects the Commission, its staff, Commissioners and wider stakeholders.
- Be a role model, widely recognised as a supporter and champion of EDI at the Commission.
- Promote and raise awareness of EDI issues across the Commission.
- Be a point of contact for staff and Commissioners on EDI issues.
- Ensure EDI is an integral part of organisational strategy and policies
- Ensure that equality impact assessments on policies and projects are undertaken as required.
- Provide a communication channel for all who work with and for the Commission on EDI issues.
- Identify and promote removal of barriers (cultural, behavioural and procedural) for all types of people.
- Be empowered to address any negative stereotypes or bias within the organisation and take actions to tackle inappropriate behaviours and actions.
- Facilitate organisational change in response to EDI issues.
- Keep up to date with the wider equality and inclusion agenda and share as appropriate with the EDI Working Group
- Liaise with other EDI Champion(s) and experts for support and to share good practice.
- Attend EDI training and awareness events as required.
- Be a member of and liaise with the EDI Working Group on actions in relation to equality, diversity and inclusion.

#### Personal specification

- Energetic and passionate about fairness, equality and inclusion.
- Ability to listen and understand sensitive situations, demonstrating empathy for diverse people and receptive to the sensitivities relating to protected characteristics.
- Objective.
- Interest in developing strong influencing skills, to face people with different opinions.
- High degree of self-awareness and personal integrity.
- Tenacious and resolute in the commitment to EDI to find new ways to overcome barriers.
- Be receptive to developing skills such as chairing the EDI working group meetings

## 1.17 Appendix D – EDI statement included in HR policies

### **Our Commitment to Equality, Diversity & Inclusion**

The Commission believe that an inclusive culture enriches all we do:

- *We value diversity and the benefits different perspectives and experiences bring to all our work*
- *We are committed to a team that is inclusive in the way we work together and the way we engage with those contributing to our reviews*

We are a disability confident employer and recruit, retain and support in their career development any individuals with protected characteristics under the Equality Act 2010 and make it straight forward to request reasonable adjustments.

Everyone involved in the Commission is responsible for EDI and has a responsibility to exhibit behaviours that promote our EDI values.

We will foster an inclusive workplace culture which is free from discrimination with regards to the nine protected characteristics as outlined by the Equality Act 2010.

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity
- race (includes colour, nationality and ethnic origins);
- religion or belief;
- sex;
- sexual orientation;

## 1.18 Appendix D – Behaviours charter

### Trust

**Open conversations:** We encourage open and honest communication, actively listen to different viewpoints and value constructive feedback.

**Empowerment:** We trust colleagues to perform their roles effectively and offer support when needed.

**Honesty & reliability:** We act with integrity, are truthful and deliver on our commitments.

### Respect

**Active listening:** We give others our full attention, avoid interrupting and demonstrate a genuine interest in understanding different perspectives.

**Fairness & objectivity:** We approach all matters impartially, free from bias or self-interest.

**Belonging:** We foster an inclusive environment where everyone feels valued, respected and empowered to have the autonomy to contribute.

### Openness

**Transparency:** We strive for clear communication, making information readily available and explaining decisions clearly.

**Accountability:** We take responsibility for our actions, decisions and outcomes, and are open to scrutiny.

**Continuous learning:** We acknowledge mistakes, learn from them and work collectively to find solutions.

### Teamwork

**Shared purpose:** We are united in our commitment to fulfilling the Commission's statutory obligations, understanding our individual roles and how they contribute to the bigger picture.

**Shared responsibility:** We work collaboratively, taking ownership of tasks and holding ourselves and each other accountable.

**Shared success:** We champion others' professional or personal achievements.