

# Morecambe Bay



## Primary Care Collaborative

# Equality and Diversity Policy

<b>Document Reference</b>	POL006
<b>Purpose</b>	The purpose of this policy is to state the key principles relating to equality and diversity policy and the approach that the Federation will take in respect of monitoring the organisations performance in this regard.
<b>Author</b>	Federation Support
<b>Application/Scope</b>	Organisation-wide
<b>Approval Date</b>	01/03/2023
<b>Review Date</b> (N.B: Review dates may alter if any significant changes are made)	01/03/2026
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# 1. INTRODUCTION

## 1.1 Summary/Background

MBPCC is committed to both eliminating discrimination and encouraging diversity amongst our workforce and in relation to our patients and service users. MBPCC will comply with the Public Sector Equality Duty as set out in the Equality Act 2010.

As stated in the equal opportunities policy, the organisation and its staff will not discriminate on grounds of age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief (including lack of belief); sex; sexual orientation.

All visitors including patients and service users will be treated with dignity and respect. The organisation will not tolerate any discrimination or perceived discrimination against, or harassment of, any visitor for reason of age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief (including lack of belief); sex; sexual orientation.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential to meet practice and personal needs.

## 1.2 Purpose

The organisation is committed to and will:

- Ensure that the same treatment and services are provided to any visitor irrespective of age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief (including lack of belief); sex; sexual orientation.
- create an environment in which individual differences and the contributions of staff are recognised and valued.
- ensure that every employee has a working environment that promotes dignity and respect
- ensure that no form of intimidation, bullying or harassment is tolerated
- provide training, development and progression opportunities to all staff, including making reasonable adjustments to support employees
- promote equality in the workplace as good management practice
- review all employment practices and procedures to ensure fairness
- regard breaches of the equality policy misconduct and could lead to disciplinary proceedings

## 1.3 Scope

This policy applies to all MBPCC employees and directors.

From time-to-time MBPCC may utilise the resources of sub-contractors to deliver contractual obligations. For avoidance of doubt, where a sub-contractor is providing care to patients, as laid out in the contracts between MBPCC and subcontractors, they are solely responsible for delivery of the regulated activity they are providing and must ensure all their employees operate under their own policies which must meet the relevant CQC standards. MBPCC will seek assurance from all sub-contractors that suitable policies are in place, and may at their discretion request copies of any relevant policies for review and for verification. In such cases this policy document does not apply.



## 1.4 Breaches of Policy

If you feel you have been discriminated against as a visitor or user of our services you should bring the matter to the attention of the Chief Executive who will ensure that the matter is investigated thoroughly and confidentially and will advise you of the outcome within 20 working days. Please refer to the MBPCC Complaints Policy (POL001).

If you feel you have been discriminated against as a staff member you should follow the organisation's grievance procedure underpinned by the organisational grievance policy.

## 2. PROCEDURE

### 2.1 Recruitment

The organisation will consider monitoring of job applicants to ensure that equality policies are in place and working. This may include the collection of information relating to gender, race, disability and age. Recruiting managers will review and highlight opportunities for improvement to the Director with responsibility for HR.

Where this is carried out the information will be requested on a separate page in the application papers which can be detached. Completion by candidates will be optional. The information sheet will be removed from the selection process, with any personal identifiable data items removed and held separately within restricted access digital HR folders of the recruiting manager and for monitoring only. The application papers will make this clear. A sample monitoring sheet is appended to this policy.

### 2.2 Training

All employees must complete mandatory training to ensure a minimum standard of understanding in relation to vital legal and policy matters. MBPCC utilises an online training platform, and within the training plan for all employees is Equality and Diversity. This provides all team members with a foundational knowledge of this important area and enables the organisation to have confidence that all employees are aware and have been able to answer questions which demonstrates a suitable level of understanding.

### 2.3 Definitions

#### Direct Discrimination

Direct discrimination occurs when someone treats someone less favourably than someone else, on the grounds of sex, age, disability, race, nationality, ethnic or national origin, gender, religion or belief, sexual orientation, gender reassignment, or pregnancy or maternity status. For example, a decision not to employ a person because that person was aged over 50 would be a direct discrimination on the grounds of age.

#### Indirect Discrimination

Indirect discrimination occurs when a provision or requirement is applied to all workers, but with the result that one group is adversely affected, more than another. For example, a recruitment requirement for candidates to be recent graduates is likely to be found to be indirect discrimination on the grounds of age.



## Victimisation

Victimisation occurs where a person is treated less favourably because he or she has carried out a “protected act”. For example

- (i) has alleged that discrimination has taken place.
- (ii) has presented a claim to an employment tribunal; or
- (iii) has acted as a witness in a discrimination case

## Harassment

Harassment, perceived or otherwise, is behaviour that violates someone’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

## Legislative Framework

- Equality Act 2010
- Sexual Orientation Regulations 2003
- Human Rights Act 1998
- Religion or Belief Regulations 2003
- Age relations 2006
- The Sex Discrimination (Gender Reassignment) Regulations 1999
- Gender Recognition Act 2004
- Civil Partnership Act 2004
- Rehabilitation of Offenders Act
- The Modern Slavery Act 2015 (a copy of MBPCC’s latest Modern Day Slavery Statement can be found on [www.mbpcc.co.uk/policies](http://www.mbpcc.co.uk/policies))

## 3. DEFINITIONS/GLOSSARY OF TERMS

Abbreviation or Term	Definition
MBPCC	Morecambe Bay Primary Care Collaborative
CQC	Care Quality Commission

## 4. CONSULTATION WITH STAFF, PRACTICES AND PATIENTS

Enter the names and job titles of staff and stakeholder that have contributed to the document

Name	Job Title	Date Consulted
Gemma Aspinall	CSU Equality and Inclusion Support Officer	16/09/2020

## 5. DISSEMINATION/TRAINING PLAN

Action by	Action Required	Implementation Date
Jo Knight/Boyana Konar	Upload policy to MBPCC website	Following approval of V1.1 end Sept 2020



Jo Knight	Delete out of date copies and host current copy on Federation G Drive (supporting induction process), updating Policy tracker	Following approval of V1.1 end Sept 2020
Andrew Giles	Ensure all employees are aware of the policy and are asked to read and understand it	MBPCC Board Meeting 22/09/20
Liz Stedman	Upload to TeamNet	Jan 2021

## 6. AMENDMENT HISTORY

Version No.	Date of Issue	Section/Page changed	Description of change	Review Date
<b>V1.0</b>	22/01/2020	Approved Policy	New Policy	22/01/2023
<b>V1.1</b>	20/09/2020	All	New format	22/01/2023
		1.1 & 1.2 Page 3	Ensuring all 9 protected characteristics listed correctly	
		1.2 Page 3	Reasonable adjustments to support staff added to policy	
		1.4 Page 4	Additional reference to complaints policy	
		2.1 Page 4	Expansion on how MBPCC monitor the recruitment process to ensure equality and diversity and how recruitment data is stored	
		2.2 Page 4	Additional information to share MBPCC training for equality and diversity	
		2.3 Page 4-5	Addition definitions and legislation included	
		Appendix 1 Page 7-8	Changes to sample monitoring form to capture more protected characteristics and ONS definitions	
<b>V2.0</b>	22/09/2020	N/A	Approval by MBPCC Board	22/09/2022
<b>V2.1</b>	19/01/2021	Page 5	Additional Definitions/Glossary of Terms added	
<b>V2.2</b>	01/01/23	Various	Grammatical/typographic amends only	
<b>V3.0</b>	01/03/23		Approval by MBPCC Board	01/03/2026



## 7. APPENDICES

### Appendix 1: Sample Monitoring Form

Monitoring is strictly confidential but not anonymous. Pay numbers are a way to identify employees for monitoring purposes to ensure fairness and access to opportunity. For job applicants, you should enter the job applied for title.

Job Title (applied for)			
Candidate Number / pay number			
Ethnicity	How would you describe yourself (mark all that may apply)		
		White British	
		White Other	
		Mixed or Multiple ethnic groups	
		Indian	
		Pakistani	
		Bangladeshi	
		Chinese	
		Any other Asian	
		Black African, Caribbean or Black British	
		Other ethnic group	
	Prefer not to say		
Religion	How would you describe your religious beliefs?		Christian
			Buddhist
			Hindu
			Jewish
			Muslim
			Sikh
			Other
			None



			Prefer not to say
Disability (a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities)	Do you consider yourself to have a disability or a long-term health condition?		Yes
			No
			Prefer not to say
	What is the effect or impact of your disability or health condition?		
Do you have any caring responsibilities for others?			
Gender	Would you describe yourself as:		a man
			a woman
			having no gender
			having a non-binary gender
			Prefer not to say
Sexual Orientation	Would you describe yourself as:		Heterosexual or straight
			Gay or lesbian
			Bisexual
			Other
			Prefer not to say
Age	What is your Date of Birth?	(DD/MM/YYYY)	
			Prefer not to say