



Diversity, Equity and Inclusion (DEI) Action Plan

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1. INTRODUCTION

This document is the Roma Support Group's (RSG) action plan for achieving diversity, equity and inclusion (DEI) of opportunity in its employment practices and in delivery of services. It has the full endorsement of the Management Committee. It has been written and is continually reviewed in consultation with stakeholders, i.e. staff, volunteers, MC members, services users, etc.

2. STATEMENT OF INTENT

2.1 The RSG fully endorses the set of DEI related policies such as Equal Opportunities Policy, Anti-harassment and bullying Policy, Recruitment and other HR Policies.

Through this Action plan and relevant policies and procedures, the RSG is committed and strives to:

- Promote the representation and participation of different groups of individuals including people with protected characteristics. This also covers people with diverse backgrounds, experiences, skills and expertise.
- Ensure the fair treatment, access, equality of opportunity and advancement for everyone.
- Create a work environment that's inclusive, supportive, respectful and collaborative and aims to get all employees, volunteers and service users to participate and contribute.
- Remove all barriers, discrimination and intolerance in employment practices and service delivery that have prevented some groups from fully participating and thus build stronger organisation.

2.2 The RSG fully embraces the spirit of the Equality Act 2010 in tackling discrimination against and disadvantages of people with protected characteristics, i.e.: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation.

2.3 In practice amongst the Roma communities, men are more likely to be, or be seen as the leaders of their particular communities. Therefore certain sections of the Roma communities, such as women, are actively encouraged to take a

positive and influential role within the organisation. There is equal access to the Management Committee for all over the age of 18 and equal access to the services that we provide.

3. AIMS

3.1 The RSG recognises that by the integration of the spirit of diversity, equity and inclusion with its employment practices and human resource policies, the full potential of staff employed by the RSG may be maximised to the benefit of the employee and the organisation.

3.2 The RSG will actively promote programmes of positive action in line with its corporate planning and the framework for development.

3.3 The 'DEI' Policies and Action Plan relate to all aspects of employment including recruitment and selection, pay, hours of work, holiday entitlement, shift work, work allocation, sick pay, training, promotion, disciplinary, grievance, incapability procedures, redundancy and working environment.

3.4 The 'DEI' Policies and Action Plan are made known to all employees, potential employees and volunteers.

3.5. The 'DEI' Policies and Action Plan also relate to service delivery and are made known to our service users.

4. MANAGEMENT

4.1 The RSG Management Committee has overall responsibility for the implementation of the set of DEI related policies and action plan, It is committed to the DEI related policies and action plan and its implementation.

4.2 The CEO is responsible for co-ordinating the application of the relevant policies and the DEI Action Plan and monitoring the effectiveness of the action plan in relation to employment and other areas.

4.3 Any person over the age of 18 years can be a member of the Management Committee. The Management Committee is made up of members elected at the Annual General Meeting, which is advertised amongst our users, the community at large and the local area. The AGM is always held at a hall which is within easy access for members and the local community, with good transport links and disabled access. It is always held in the early evening making it accessible for all ages and genders.

4.4 We have representatives of different Roma communities in the Management Committee. In order to ensure active and meaningful participation of Roma community members in the RSG's Management Committee, the RSG provides interpreters during MC meetings, translate minutes and other relevant documents.

4.5 The RSG implements an Induction Policy and Staff Development Policy, which also applies to members of the MC. These are annually reviewed. The RSG's CEO has prepared a MC Handbook, which is updated annually and enables MC members to have all information regarding the charity, its history, mission, aims, service delivery, etc. It also describes the duties and responsibilities of the Management Committee as well as the duties and responsibilities of the MC Chief Officers and other MC members. In addition to this, every new MC member receives an induction from the RSG's CEO and an existing MC member.

5. ALLOCATION OF RESPONSIBILITY

5.1 The RSG accepts its primary responsibility as an employer to ensure diversity, equity and inclusion of its employees, volunteers and service users. Nobody is treated differently because they have or thought to have protected characteristics (see point 2.2 above). Particular responsibility therefore falls on the CEO in the treatment, assessment, transfer, promotion of their staff and to individuals involved in the recruitment, selection and training functions.

5.2 It is the responsibility of all staff to carry out the guidelines and good practice set out in the DEI Action Plan and relevant policies

5.3 DEI training is an important part of the RSG's commitment preventing discrimination, harassment and victimization, promoting diversity, equity and inclusion. The RSG provides DEI training to staff and volunteers in the following way:

- as part of the induction process
- during regular team meetings
- by asking staff to attend specific courses.

6. MONITORING AND REVIEW

6.1 The RSG is committed to an effective monitoring and review of its objectives to ensure the effective implementation and progress of DEI Action Plan.

Responsibility for the day to day co-ordination of monitoring and reporting rests with the CEO. Annual strategic reviews are undertaken by the Management Committee in consultation with staff, volunteers, service users and other stakeholders.

6.2 The aim of the monitoring system will be to establish the extent to which minority ethnic groups, women, and people with protected characteristics (see point 2.2 above) are represented in recruitment, promotion, training, salary / pay; grievance & disciplinary action as well as management development activities and service delivery by reference to the protected characteristics.

This helps the RSG to:

- recruit under-represented or disadvantaged groups;
- promote people fairly;
- check that women and men's pay is comparable in similar or equivalent jobs
- make progress towards aims set out in our Equal Opportunities Policy
- ensure diversity, equity and inclusion in service delivery.

Things, which the RSG monitors include:

- How many people with a particular protected characteristic apply for each job/voluntary position, are shortlisted and are recruited or promoted;
- How many people employed/volunteering/accessing our services have a particular protected characteristic and if applicable at what levels within the RSG are they employed;
- The satisfaction levels of staff/volunteers/service users with a particular protected characteristic;
- Whether disciplinary action is disproportionately taken against workers with a particular protected characteristic.

6.3 The RSG develops ways of monitoring the effectiveness of its DEI initiatives. However, it is important to recognise that it is not possible or appropriate to monitor progress by the use of statistics in all areas. For this reason, monitoring in respect of discrimination on the grounds of sexual orientation or creed does not include keeping records on an individual's sexuality or religious belief.

6.4 The monitoring system depends upon information being available. Therefore all employees, job applicants and volunteers and service users are asked to complete a self classification form or provide relevant information. The reason for gathering the information will be made clear to all job applicants, volunteers and service users. The giving of information is optional, but the RSG urges co-operation in order to achieve effective monitoring of progress.

6.5 The RSG gives absolute assurance that information obtained as part of monitoring of DEI will not be used for any other purpose.

7. SELECTION OF PROCEDURE

7.1 The RSG recognises that the process adopted in the recruitment and selection of staff and volunteers as well as access to the RSG services can have a significant effect on the elimination of discrimination, the quality of staff recruited and inclusion of people with protected characteristics. The spirit of this DEI action plan is embraced by the RSG's Equal Opportunities Policy, Recruitment Policy and other relevant policies. Monitoring of the RSG's practices in this area is the responsibility of the CEO, with specific authority to ensure that good practice in recruitment and selection is compatible with the aims and objectives of the DEI action plan and all the relevant policies.

7.2 The RSG avoids direct and indirect discrimination, discrimination arising from a disability, harassment and victimisation in all aspects of recruitment and service delivery. The RSG also makes reasonable adjustments for disabled people.

7.3 The RSG takes 'positive action' before or at the application stage to encourage people from groups with a track record of disadvantage or low participation to apply for jobs, volunteering roles and participate in delivery of the RSG activities. In the recruitment of staff and volunteers the RSG proactively seeks to recruit people from the Roma community in order to tackle various disadvantages faced by Roma community members in accessing employment; encourage the development of new skills and public spirit within the community as a way to self-empowerment and as a step towards breaking the cycle of social and economic exclusion.

8. TRAINING

8.1 All training will be in line with the RSG's DEI objectives and designated to improve the individual's capabilities to the mutual benefit of the employee, volunteer and the RSG. This may require training and the development of new skills, which might include increasing general awareness of race, gender, disability, and other protected characteristics, legal issues, or the role and responsibilities of staff, members and the Management Committee.

8.2 The RSG will specifically adopt training measures to facilitate the implementation and progress of DEI in employment. This Policy's aims are embraced by the RSG's Induction Procedure, Staff Development Policy, etc.

8.3 The RSG offers training to its staff and volunteers without unlawful discrimination, making reasonable adjustments if necessary. This may include:

- learning 'on the job'

- coaching
- e-learning
- workshops
- induction programmes
- job shadowing
- mentoring
- networking and seminars
- formal classes on day release or out of work hours
- project work.

In its decision who needs to undergo training, the RSG does not stop someone doing training because they are pregnant, on maternity leave or due to take maternity leave, or on pregnancy or maternity-related sickness absence, unless a specific risk to health and safety has been identified.

8.4 Training will also be open for the Management Committee to continuously improve the effectiveness of the MC and to keep up with changes to the law as applied to the Equal Opportunities Policy and other DEI related policies. The RSG has developed a Training Development Programme for MC Members depending on their individual and collective needs and/or changes from both within and outside the Roma Support Group.

9. PURPOSE OF THE ACTION PLAN

9.1 The purpose of the DEI Corporate Action Plan is to translate the RSG's commitment to diversity, equity and inclusion into all areas of its employment practices and service delivery.

9.2 In implementing the plan, the RSG recognises the different and special needs of groups with protected characteristics, who may experience oppression, discrimination and disadvantage in society.

10. ACTION PLAN (employment and service delivery)

10.1 Race / ethnic or minority ethnic groups:

- A. The RSG is committed to the eradication of racism in all aspects of its employment of staff. (For more information see the RSG's Recruitment Policy, Staff Supervision Procedure, Staff Development Policy, Redundancy Policy, and Volunteer Policy).
- B. In the recruitment of our staff and volunteers we proactively seek to recruit people from the Roma community in order to encourage the development of new skills and public spirit within the community as a way to self-empowerment and as a step towards breaking the cycle of social and economic exclusion.

- C. The RSG is committed to an action programme which seeks to ensure that people from black and minority ethnic groups are represented throughout the organisation.
- D. One of the ways in ensuring participation of ethnic minority groups in MC, consultations, services, especially amongst the Roma is to provide interpreters. The RSG's members of staff and volunteers speak East European languages (i.e. Polish, Serbo-Croatian, Czech, Slovak, Russian, and Romanian) and Romany languages (Polska Roma, Xaladytka Roma, Kelderari, etc.)
- E. The RSG has a policy of designing, printing and disseminating /displaying bi-lingual publicity regarding our services, as well as evaluation/ feedback forms, which communicate information and ask questions in the most effective way. However, as many Roma service users are illiterate, our volunteers and staff read out questions to individual clients and write down their answers, the RSG also records short information videos in community languages which are disseminated through channels used by our service users.
- F. It is our principle objective to set up our services as close to the Roma community as possible in order to make access easy for everyone who may need our services. Therefore, in addition to our main office in the East London, which is the main centre of Roma communities in London, we also operate from our outreach base in White City in West London and run an outreach service London-wide for particularly vulnerable or disabled service users. We endeavour to outreach the most isolated, terminally ill or very sick clients through home visits.
- G. The RSG's service users come from different Eastern European countries (Poland, Slovakia, Czech Republic, Serbia, Bosnia, Lithuania, Romania, Ukraine, etc.) and different tribes and different clans within these tribes. Although the highest percentage of our clients come from Poland and Romania, we actively outreach Roma communities from other countries to access our services by recruiting volunteers from these communities, provide adequate language support and involve them in participation in community events and meetings (AGMs, community meetings, project steering groups, etc.). We also have representatives of different tribes and communities in the Management Committee.
- H. The RSG's services focus on advocacy and empowerment of older and young people from the Roma community, who are some of the most vulnerable people in the UK – traditionally disengaged, marginalised and discriminated against.
- I. In order to make all Roma beneficiaries feel welcome and boost their self-esteem, we actively promote positive representation of Roma culture and people in our publicity and office interior by: displaying work of Roma children, photos of our cultural and other youth activities, art work of Roma artists, etc.
- J. The Roma Support Group's services are available to Roma refugees and migrants from different East European countries (Poland, Slovakia, Czech

- Republic, Serbia, Bosnia, Lithuania, Romania, Ukraine, etc.) and different tribes and different clans within these tribes.
- K. The RSG is a voluntary organisation that provides practical support for Roma asylum-seekers, refugees and migrants. It is our intended objective and commitment to improve the quality of life for Roma refugees through language training; linguistic and advocacy help in accessing service providers; job enhancement schemes; organised cultural activities. It is also our objective to make the public aware of the discrimination and exclusion from the main stream society the Roma people are facing in Europe through workshops, conferences, publicity, etc. We also organise cultural events and festivals in order to promote the cultural contribution made by Roma artists and the better understanding of Roma culture.
 - L. Some of the RSG's activities are open to all Roma children and young people, focusing on the needs of those who are the most vulnerable and at high risk, i.e. NEET, disengaged from school/truant, young offenders or at high risk of offending, homeless, teenage mothers/parents, children and young people with special needs, substance misuse, etc.
 - M. Bearing in mind that many young Roma girls are not allowed to attend activities unless they are chaperoned by another female, we endeavour to recruit female volunteers who are able to assist these girls on their journey to and from our office and outreach centers.
 - N. Although sexuality is still a sensitive subject in Roma communities, the RSG is promoting a more open attitude amongst Roma community members towards this subject by disseminating information, publicity; organising workshops, etc.

10.2 Gender:

- A. The RSG seeks to improve the opportunities available to women and to recognise the skills and experiences of women which have been traditionally undervalued.
- B. In practice, amongst Roma communities, men are more likely to be, or be seen as leaders of their particular communities. Therefore we encourage certain sections of Roma communities, such as women and girls, to play an active role within the organisation, as well as in our activities.
- C. Individuals regardless of gender will be encouraged to apply for all jobs unless there are genuine occupational qualifications which restrict a job to one of the sexes.
- D. The RSG recognises that its employment practices must be geared to the needs of both men and women, and must allow for the demands which family care responsibilities place on staff.

10.3 People with disabilities:

- A. Following the guidelines of the Department of Employment, Equality and Human Rights Commission the RSG takes appropriate action to improve employment opportunities for people with disabilities.
- B. The RSG takes steps to ensure the maximum integration of people with disabilities into the workforce by the adoption of an action programme and making appropriate/ reasonable adjustments, i.e.: (i) recording disability-related time off separately from general sick leave; (ii) staying in touch if someone is absent for a long period to find out how they are and to tell them what's happening at work; (iii) establishing a plan for return to work before they come to workplace in order to start work gradually or to do some work from home; (iv) other reasonable adjustments.
- C. All the work undertaken by the RSG on premises where we meet and work with our service users are chosen on the basis that they provide access for the disabled, so not to exclude the most vulnerable members of the community.
- D. The RSG does not pay sick pay beyond what they normally pay just because time off is disability-related but it makes a reasonable adjustment to offer unpaid disability leave, or allowing someone to take the extra time off as annual leave.

10.4 Sexual orientation:

- A. A person's sexual orientation will not be taken into account in determining their conditions of service, suitability for recruitment, promotion, training or grounds for dismissal.
- B. The RSG recognises that discrimination on the basis of a person's sexual orientation does not conform to our commitment to developing a more positive environment where all individuals are valued.

10.5 Age:

The RSG recognises the benefits to be gained from removing discrimination on the grounds of age. It is therefore committed to a process of eliminating age stereotypes and assumptions and will treat employees/volunteers and potential employees/volunteers on their merits regardless of age.

10.6 Creed:

- A. Some religions or beliefs may require their followers to pray at certain times of the day, or to have finished work by a particular time.
- B. The RSG applies a rule to allow staff and volunteers to take particular rest breaks or to finish work by a particular time as otherwise this may be indirect discrimination because of religion or belief.
- C. The RSG recognises that it is good practice to provide facilities which cater for the needs of staff with a particular religion or belief. These might include making a room available for prayer, providing separate fridge

shelves for food that needs to be kept separate and providing refreshments or meals for staff/ volunteers/ service users in order to meet their dietary requirements.

10.7 Maternity and Pregnancy:

- A. The RSG does not treat an employee or a job applicant different due to maternity or pregnancy.
- B. The RSG will not refuse to employ a woman because she is pregnant, on **maternity leave** or because she has (or has had) an illness related to her pregnancy. (Equality law does not say that a woman applying for a job has to tell the employer that she is pregnant. This is because the employer must not base their decision about whether or not to employ her on whether she is pregnant but on whether she has the skills to do the job.)
- C. The RSG recognizes that pregnancy and/ or maternity are not something that should be taken into account in deciding whether a person has the skills needed for a particular job.
- D. The RSG will provide suitable rest facilities for breastfeeding women employees.
- E. Although there is no legal right for workers to take time off to breastfeed, the RSG will try to accommodate women who wish to do this, bearing in mind that:
 - (i) It has a legal duty of care to remove any hazards for a worker who is breastfeeding and this can include stress and fatigue, and
 - (ii) a refusal to allow a woman to express milk or to adjust her working conditions to enable her to continue to breastfeed may amount to unlawful sex discrimination.

10.8 Harassment:

The RSG will not tolerate harassment against any individuals whether physical or verbal and is committed to maintaining grievance and disciplinary procedures to deal effectively with any incidents which may occur.

10.9 Flexible working arrangements:

- A. The RSG recognises that in order to attract and retain previously disadvantaged groups and to create realistic equal opportunities for all staff, it will need to review working practices. Within the action programme commitment to the development of flexible working arrangements where appropriate e.g. job sharing, will be given.
- B. Special consideration is given to staff who have protected characteristics or who are associated with people with protected characteristics as carers (i.e. children, older relatives, etc.)

- C. The RSG gives special consideration sickness absence which is related to a woman's pregnancy or to her having given birth and records pregnancy-related illness separately from other kinds of illness and should not count it towards someone's total sickness record.
- D. The RSG does not take into account a period of absence due to pregnancy-related illness, or maternity leave, when making a decision about a woman's employment, for example, for disciplinary purposes or if they are selecting workers for redundancy.
- E. The RSG gives a pregnant employee time off for ante-natal care. Ante-natal care can include medical examinations, relaxation and parenting classes.
- F. When dealing with workers who request or take maternity, paternity, adoption or parental leave, the RSG ensures that they do not discriminate against a person because of protected characteristics.

10.9 Positive action:

- A. Legislation permits employers to take positive action to overcome the consequences of past discrimination. The Race Relations and Sex Discrimination Acts allows for training and encouragement where few or no members of the disadvantaged groups have been doing particular work in the last 12 months. It is in this spirit that the RSG is committed to a programme of positive action, with the objective of greater realistic opportunities for equality in employment.
- B. It is important not to confuse positive action strategies with positive discrimination which is unlawful and involves treating one group more favourably than others. An illustration of this would be discriminating at recruitment / selection stages for work because of under representation of a particular race or sex.
- C. The Equality Acts do allow for the provision of special training where groups are under represented in particular areas of work. (Fuller guidance about the provisions of the Equality Act 2010, including the **Employment Code of Practice**, is available from the Equality and Human Rights Commission.)
- D. Selection on racial grounds is permissible in certain jobs where to be of a particular racial group or gender is a genuine occupational qualification.

10.10 Disciplinary and grievance procedures:

The RSG procedures reflect the seriousness by which it considers failure to comply with the provisions of its Equal Opportunities Policy, Anti-harassment and Bullying Policy

10.11 The legal position

- A. Legislation exists which recognises that various forms of prejudice and disadvantage result in discrimination against various groups of people with protected characteristics (see point 2.2). The legislation encourages employers to eliminate discrimination and take positive action in the development of diversity, equity and inclusion in employment and service delivery.
- B. The RSG has adopted the principles behind specific legislation in its approach to combating discrimination in other areas regardless of legislation.

10.12 Types of discrimination

The Race Relations and Sex Discrimination Acts recognise three forms of discrimination: direct discrimination; indirect discrimination; victimisation. In considering discrimination on the grounds of race or sex, it is important to understand the legal force associated with these issues.

a) Direct discrimination:

It is associated with practices, which treat a person on the grounds of race, colour, nationality, ethnic origin, citizenship, sex or marital status and other protected characteristics less favourably than others are or would be treated in similar circumstances: for example, refusing to employ someone because they are married.

b) Indirect discrimination:

It is associated with practices, which are not necessarily intended to be prejudicial but which have a discriminatory effect. To apply a condition or requirement which has an unequal and detrimental effect on a certain racial group, women or married people, even though the same condition or requirement was applied to all applicants or employees, would be considered indirect discrimination if the condition could not be fully justified. Examples include:

- i. Eligibility for company terms and conditions set against hours of work without good reason. Statistics prove that more women take part-time working options than men.
- ii. Selection tests which are not job related or any requirement which is not considered necessary for effective job performance.
- iii. The RSG will take steps to ensure individuals have an understanding and appreciation of the detriment of indirect discrimination.

c) Victimisation:

The RSG's Policy specifically protects individuals in the event of an allegation or complaint of discrimination or harassment or because they have taken action in support of the rights of people in the groups specified by the Equal Opportunities Policy.

Date reviewed	Reviewed by
02/12/2014	Sylvia Ingmire
02/12/2015	Sylvia Ingmire
02/12/2016	Sylvia Ingmire
01/12/2017	Sylvia Ingmire
03/12/2018	Sylvia Ingmire
03/12/2019	Sylvia Ingmire
03/12/2020	Sylvia Ingmire
03/12/2021	Sylvia Ingmire
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