



Equality, Diversity and Inclusion Policy

All Services

The Community believes that regardless of background, personal identity or circumstance, everyone deserves to work in a safe, supportive environment with equal opportunity to develop skills and reach their full potential. This policy sets out the Group's expectations regarding Equality, Diversity and Inclusion.

Polaris will ensure engagement and promotion of this policy through the induction process and thereafter via signposting as appropriate. It is available to all staff and apprentices online and searchable via our database of policies and procedures.

Support to implement this policy will be ensured via induction and training and via supervision.

This Policy is reflected within our recruiting process, training, and work with external employers and apprentices. All policies are routinely reviewed. References to 'Staff' also includes apprentices and volunteers.

This policy forms part of the Quality Management system ISO 9001.

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	Grievance Policy and Procedure
	Harassment, Bullying and Discrimination Policy
	Family Leave Policy

All Polaris companies are detailed in the current legal structure

Contents

Purpose and Objectives	3
The Community's Responsibility as an Employer	4
What the Community Expects from Employees.....	4
Equal Opportunities	4
Direct Discrimination	5
Indirect Discrimination.....	5
Harassment.....	5
Sexual Harassment.....	6
Victimisation	6
Discrimination by Perception	7
Associated Discrimination.....	7
Equal Opportunities in Employment.....	7
Equal Opportunities Training and Development	8
Age.....	8
Disability	9
Marriage and Civil Partnership.....	10
Pregnancy, Maternity and Family Leave	10
Race and Ethnicity.....	11
Religion and Belief	12
Sex, Gender and Gender Identity (including Gender Nonconforming identities and Transgender).....	14
Sexual Orientation	16
Neurodiversity (including Dyslexia, Dyspraxia, Autism and ADHD)	17
Commitment in working with Children and Young People.....	19
For our Children/Young People.....	19
Polaris People (Diversity Group)	20

Purpose and Objectives

The Community uses the definition of diversity and inclusion as given by the Chartered Institute of Personnel Development (CIPD):

“Diversity is the differences in colour, ethnicity, abilities, age, gender, beliefs, interests, socioeconomic (class), marital or partnership status, sexual orientation, geographic, academic/professional backgrounds, opinions, backgrounds, thinking, experiences and many other characteristics.

Diversity recognises that everyone is different in a variety of visible and non-visible ways, and that those differences are to be recognised, respected, valued, promoted and celebrated. They may include, but are not limited to, differences protected by equalities law.”

“Inclusion is the practice of including people in a way that is fair for all, values everyone’s differences, and empowers and enables each person to be themselves and achieve their full potential and thrive at work.

An inclusive workplace culture is one in which everyone feels that they belong, through feeling safe in being themselves, that their contribution matters, policies and practices are fair and a diverse range of people are supported to work together effectively.”

The Community recognises that everyone is different, and as such, values everyone as individuals. The Community believes that regardless of background, personal identity or circumstance, everyone deserves to work in a safe, supportive environment with equal opportunity to develop skills and reach their full potential. The Community acknowledges that intersectionality (the concept that we all have multiple, overlapping identities due to our social demographics) will also impact our experiences, and as such, a ‘one size fits all’ approach with regards to managing employees may not allow fairness or equality of opportunity for everyone. Therefore, the Community strives to work in a consistently fair, but flexible and inclusive way, while ensuring the needs of both individuals and the Community are supported.

In the UK, ‘protected characteristics’ are covered in discrimination law to give people protection against being treated unfairly. The Community will at all times, ensure the fair treatment of all employees, including those who have one or more of these characteristics. The protected characteristics include: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation.

In addition to the protected characteristics, the Community recognises the need to acknowledge neurodiversity in our diversity and inclusion efforts. This refers to alternative thinking styles, including but not limited to dyslexia, dyspraxia, autism and ADHD.

The Community is aware that managing diversity and maintaining a culture of inclusion is not a one-off initiative, but rather a continuous process, with room to develop and improve our practices. However, it is equally important to acknowledge that everyone has a personal responsibility to uphold the standards of diversity and inclusion set out in this policy, and to hold each other to account if this is not being upheld.

The Community will record data in relation to protected characteristics of the workforce and of job applicants. From time to time, the Community may ask employees about their protected characteristics. This data is taken in strict confidence and is held securely in accordance with GDPR. At all times you have the right to prefer not to state if you do not wish to disclose this information.

The Community's Responsibility as an Employer

It is the responsibility of each Manager and all other supervisory staff to actively promote equality of opportunity within their own spheres of responsibility. It must not be overlooked that discrimination can take many forms, e.g. age, religion, belief, skin colour, sexual orientation or perception of, disability – even dialect or accent - can all form the basis of unwanted aggression and attention. Disciplinary action will be taken against employees who are found to infringe the Equality, Diversity and Inclusion policy.

What the Community Expects from Employees

- Eradicating discrimination depends on everyone's cooperation. Employees must not harass, sexually harass, abuse or intimidate other employees on any grounds.
- Employees must co-operate with measures to ensure equal opportunity and non-discrimination for all. Employees must not victimise individuals on any grounds.
- The Community will not condone harassment, or sexual harassment, of any employee whether committed by members of the public or by colleagues. Nor will the Community condone any acts of harassment, or sexual harassment, by employees against members of the public.
- Individuals suspected of discrimination will be liable to disciplinary action, which may lead to dismissal.

Equal Opportunities

It is Community policy to recognise its responsibilities under Equal Opportunities regulations. The policy is governed by the Equality Act 2010, which makes it unlawful to discriminate directly or indirectly, in recruitment or employment because of a protected characteristic. Within our Northern Ireland agency, we will also monitor our workforce composition and

undertake periodic reviews as required by Article 55 of the Fair Employment and Treatment (Northern Ireland) Order 1998.

The Community is committed to ensuring equal opportunities across all procedures and practices, and ensuring that they are non-discriminatory.

There are six different types of discrimination:

Direct Discrimination

This occurs where a person is treated less favourably than another because of a protected characteristic. In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is a genuine occupational requirement (GOR). The GOR must be crucial to the post and a proportionate means of achieving a legitimate aim.

EXAMPLE: The team have planned to go out on a Friday night after work. June has not been invited out by the team as she is in her 50's and her colleagues say that she will not enjoy herself. When June asks why she has not been invited, she is told that she is too old. June is experiencing direct discrimination as she is being treated less favourably than others because of her age, a protected characteristic.

Indirect Discrimination

This is where a provision, criterion, practice or policy is applied equally and affects everyone equally, but has a disparate impact on a greater proportion of people of one Community with a protected characteristic compared with people who do not share that characteristic, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

EXAMPLE: Sarah has a physical disability, which causes her issues with walking, as a result she parks directly outside the office. A new policy states that all staff must park in a car park that is a much further distance from the office. Sarah is experiencing indirect discrimination because while the policy is applied to everyone equally, it causes a much larger (and disproportionate) impact on Sarah because of her disability.

Harassment

This refers to instances where there is unwanted conduct, related to a protected characteristic that has the effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

EXAMPLE: Richard has recently started in a new role and is working with a new team. Richard has mentioned his boyfriend in a few conversations. One day, Richard overhears a colleague referring to Richard's sexual orientation using derogatory words which has caused some offense. Richard raised this with the colleague, who then said it was meant as a joke. Richard feels humiliated and offended by the incident. The colleague continues to make 'jokes' of such nature. Richard is experiencing harassment due to a protected

characteristic. This situation needs to be dealt with swiftly to support Richard and educate the other team members that this is not acceptable behaviour.

Sexual Harassment

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to sexual harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.

Sexual harassment may include, for example:

- (a) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- (b) continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
- (c) sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
- (d) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); or
- (e) offensive emails, text messages or social media content.

Victimisation

Victimisation arises when an employee is treated badly because they have either made a complaint or raised a grievance under the Equality Act 2010 (or they are suspected of doing so), or supported somebody else in doing so (or they are suspected of supporting somebody in doing so), or are the subject of unfair action or sanction. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint.

EXAMPLE: Olivia was called as a witness in a complaint that had been raised against her line manager by another member of staff. Olivia was honest when asked questions and as such supported the claims made by the complainant. Following the complaint, her line manager has remained in post. Olivia has found that her line manager has been rude, critical and standoffish with her since she gave evidence of the complaint. Olivia is experiencing victimisation as she is being treated less favourably after supporting the complaint.

Discrimination by Perception

Discrimination by perception is discrimination against somebody because it is believed that a protected characteristic may apply to them, even if it may not be the case.

EXAMPLE: Jacob is heterosexual, however some people in the office think that Jacob is gay. Whenever Jacob leaves to meet one of his male friends for lunch, his Line Manager says to Jacob, “off to see your boyfriend again? Jacob finds this quite challenging and threatening. Jacob is experiencing discrimination as he is being made to feel uncomfortable due to his perceived sexual orientation.

Associated Discrimination

Associated discrimination is discriminatory behaviours against somebody because they are associated with somebody who has a protected characteristic.

EXAMPLE: Alex, who is white, is in a relationship with his girlfriend, who is black. Since Alex’s line manager realised that Alex’s girlfriend is black, Alex has found that he has been treated negatively by his line manager. Alex is experiencing associated discrimination because he is being treated less favourably because he is associated with someone who is black, a protected characteristic.

Equal Opportunities in Employment

The Community will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability.

The Community will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done. When considering requests for variations to these standard working practices, the Community will only refuse such requests if the Company considers it has good reasons, unrelated to any protected characteristic, for doing so. The Community will comply with its obligations in relation to statutory requests for contract variations.

The Community will record the protected characteristics of the workforce and of applicants for jobs (including promotion).

Equal Opportunities Training and Development

The Community is committed to promoting the professional development of all employees. Induction, training and promotion opportunities will operate in a fair and non-discriminatory way so as to maximise the potential of all employees.

The Community will provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

The Community will provide training to all existing and new employees and others engaged to work for the Community to help them understand their rights and responsibilities under the equal opportunities policy and what they can do to help create a working environment free of bullying and harassment.

Age

Age discrimination refers to the unfair treatment of individuals or group of individuals based upon assumptions relating to their age. Common assumptions/stereotypes are based on 'maturity/immaturity', 'fitness/unfitness', 'experience/inexperience.' Age discrimination has been illegal in the UK since 2006, with the law now incorporated into the Equality Act 2010. All ages can be affected, including both younger and older employees.

As of 2011, there is no longer a normal or enforceable retirement age for employees. As such, any dismissal of an older employee will follow a fair dismissal procedure. In addition, any employee who wishes to retire, will need to give the minimum notice period required in their contract of employment.

Employees of all ages are eligible for training and development. If there is specific training or development that an employee would like, they should discuss this with their line manager. The Community recognises that age is a poor predictor of performance, and could be misleading to equate physical and mental ability with age. As such, the Community will base any employment decisions (such as recruitment, promotion, reward, redundancy, training etc.) on competencies, qualifications, skills, potential and objective job-related criteria obtained through analysis of job requirements and job performance.

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Disability

Disability discrimination has been illegal in the UK since 1995, with the law now incorporated into the Equality Act 2010. Disability is defined by the Equality Act 2010 as a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities. 'Long-term' means that the condition must last, or be likely to last, for more than 12 months, or is likely to last for the rest of the life of the person affected. It covers physical disability, some medical conditions and mental illness.

The Community recognises that the impacts of a disability on an employee will differ and as such, no 'one size fits all' approach can be taken. Therefore, the Community's focus is on the effects an employee is experiencing at work, not on the disability or condition from which those symptoms may emerge.

The Community will uphold its responsibility to make reasonable adjustments to support and accommodate the needs of the employee with the disability. This may involve a referral to Occupational Health so that the Community can better understand what supportive measures would be advisable for the employee in their particular situation. The Community will ensure it involves the employee in any discussions about suggested adjustments. Potential adjustments may include (but is not limited to): altering premises, altering procedures, training or mentoring, provision of supportive/specialist/modified equipment, altering communication methods, modified working hours, flexible working. The aim of any adjustment, including those suggested by Occupational Health, is to remove or limit any barriers the employee with a disability is experiencing. The Community will ensure it makes reasonable adjustments to achieve this. Consideration should also be given to parking facilities, toilet facilities and health and safety issues such as fire alarms and procedures. Advice is available from the Community's Health and Safety Officer.

It is important to note that disability should not be confused with ill-health. Disability can affect health in different ways, but may not be health-related at all. Furthermore, not all disabilities are visible or immediately obvious. Where the disability is not obvious, the individual should be asked if they wish their colleagues to be informed of their disability and supervisory staff should respect their wishes in this regard. Each person's individual circumstances and preferences may be different and this should be discussed between the individual and their manager as appropriate. In certain cases, it may be appropriate for some colleagues to be aware of the condition in order to be able to respond appropriately in the case of an emergency.

When a member of staff develops a disability which affects their ability to carry out the duties of their job, departments should, in the first instance, contact Human Resources who will ensure that there is co-ordination between management, the employee, Occupational Health and any other parties, which may be appropriate.

On many occasions, premises are attended by members of the public and users of our services. The Community will ensure that relevant buildings are accessible or that alternative arrangements can be made.

All job applicants should be asked prior to an interview if they require any assistance to enable them to participate fully in the interview, for example an accessible interview venue, a signer or the provision of information in an alternative format. Those involved in recruitment should not assume that employing disabled people will cause problems or generate significant cost.

We are proud to be a Disability Confident Employer (Level 2 of the Disability Confident Scheme). The Community will continue its participation in the scheme and renew its accreditation as required. For information on the Disability Confident Scheme, please refer to the following link: [Level 2: Disability Confident Employer - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/disability-confident-employer)

The Community will base any employment decisions (such as recruitment, promotion, reward, redundancy, training etc.) on competencies, qualifications, skills, potential and objective job-related criteria obtained through analysis of job requirements and job performance.

Marriage and Civil Partnership

Discrimination of married people or those in a civil partnership is protected against in the Equality Act 2010. Marriage covers any formal union between two people (including people of the opposite sex and people of the same sex). A civil partnership is one that is registered under the Civil Partnership Act 2004.

Employees who are married or in a civil partnership will not be discriminated against. Further to this, while not protected under the Equality Act 2010, the Community will also ensure that employees, who are single, in couples that are not legally recognised, divorced or had their civil partnership dissolved will also not be discriminated against.

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Pregnancy, Maternity and Family Leave

Discrimination relating to pregnancy and maternity is protected against in the Equality Act 2010. The Community recognises that the same principles that protect pregnancy and maternity, should also be extended to paternity and adoption. The Community will ensure that employees who are pregnant or on maternity leave, as well any employees on

paternity or adoption leave, will not be discriminated against. Employees on family leave (maternity, paternity, adoption) can always find live vacancies on the Polaris Community jobs page (<https://www.polariscommunity.co.uk/careers/jobs/>) or via The Exchange portal. Furthermore, no promotion or hiring decisions will be made based on whether employees are or may in the future be on maternity, paternity or adoption leave. The Community will ensure it makes reasonable adjustments for pregnant employees, as individual needs are highlighted.

The Community recognises that following family leave (maternity, paternity, adoption) that the employee may want to amend their working arrangements. This should be managed through the flexible working process. For further information on this, or other details pertaining to pregnancy, maternity, adoption or family leave, please refer to the Family Leave Policy or contact a member of the HR team.

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Race and Ethnicity

Discrimination against Race has been illegal in the UK since 1976, and it is now protected under the Equality Act 2010. For the purposes of the Equality Act 2010, this includes colour, nationality and ethnic or national origins. A racial Community can be made up of one or more distinct racial Communities, for example Black, White, Chinese, Romanian, Black Briton, British Asian, Romany Gypsies and Irish Travellers.

The Community recognises its responsibility to all employees, service users and the communities it operates in to ensure that employees, the Community itself, and any suppliers the Community interacts with, operate in respectful and inclusive environment. The Community values people from all backgrounds and wants to encourage the inclusivity of different cultures within the workspace. As such, everyone should be respectful of and sensitive to any cultural differences.

The Community will not tolerate any form of racism, or discrimination of any kind due to Race and/or Ethnicity. The Community acknowledges that generalisations such as the term BAME, encompasses people from a broad range of backgrounds, cultures and traditions, and as such, this may mean that the needs of such employees or barriers to such employees may be different. As such, the Community seeks not to homogenise people into generic Communities, rather to value and respect the individuals.

The Community recognises the issues raised globally regarding structural, systemic and institutional racism. The Community does not condone any form of racism and encourages

everyone to challenge racism. If any employee feels affected in their work due to any form of racism, including structural, systemic and institutional racism, the Community encourages employees to speak with their line manager, agency director/department head, a member of the HR team, or any other individual they see fit or feel comfortable to talk to, to discuss this. The Community will always take such matters seriously and will take every effort to ensure this is not the case within the Community.

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Religion and Belief

Religion and Belief discrimination is illegal in the UK and is listed as a protected characteristic in the Equality Act 2010. Protection is given to those with any religion, or any religious or philosophical beliefs as well as those without a religion or belief. There is no definitive list of religions or beliefs.

The legislation does not give a list of groups that are covered but case law has confirmed that the following religions or beliefs have been covered under the discrimination provisions: Muslim, Christian, Hindu, Jewish, Sikh, Buddhist, Pagan, Humanist and Atheist beliefs.

There is no statutory right to time off for religious holidays but there is an expectation that an employer will be as flexible as possible. The Community will accommodate requests as much as possible, subject to ensuring business/service user needs are met. Leave requests for pilgrimages will be treated like any other request for extended leave. To that end, the Community will try to accommodate requests for extended leave in a fair and reasonable manner whilst ensuring that business cover does not suffer. Different religions have specific requirements for mourning periods. It may be necessary for staff to take a combination of compassionate leave and annual leave to fulfil these requirements. Please note, the annual leave component of any mourning period will be treated in the same way as any other request for annual leave.

The Community recognises that certain times of the week are more likely than other to have a religious significance to people of faith. The needs of the business are the top priority and employees (and recruitment applicants) are expected to fit in with the timings of normal operational processes. Any flexibility shown in, for example, rearranging meetings and other business events, will be occasional, exceptional and will not be on religious grounds but rather on the basis of goodwill. In particular, working on Friday afternoons, Saturday's and Sunday's may be required as a legitimate business need; and employees will be expected to be available for work.

The Community is committed to promoting diversity and equality within the workforce and respects an individual employee's preference or requirement for customary dress or specialist clothing. The wearing of religious or cultural dress is permitted, with risk assessments in place where necessary. The Community recognises there are positive benefits to our service users for our employees to be representative of society. The Community reserves the right to curtail individual dress choice based on factors such as health and safety.

If there is a concern for an employee's health or safety, the advice of the Polaris Health and Safety Officer will be sought, and where possible, risk assessed to allow the employee to continue their religious or cultural expression.

Where employees wish to pray during the working day, they should discuss this with their line manager to try and identify a suitable space (subject to local workplace layout) to provide privacy to the employee, as well as minimum disruption to others and the working day.

The interaction between individuals in the workplace is important to consider, particularly where certain work ethics or habits exist. No detriment will be suffered by employees who do not engage in social activities (such as having a drink after work, the pub culture or using office parties as team building) or social interactions (such as physical contact, handshakes or making eye contact). Where employees attend work functions where catering is provided, a range of food and beverages will be offered, to ensure that any religious dietary requirements can be met. Employees should make those organising the event aware of what their dietary requirement is to ensure this can be arranged.

The Community recognises the value in a free exchange of religious and philosophical ideas with a view to raising awareness and giving/listening to expressions of individual choice. However attempts to force religious and philosophical views onto other employees or service users is not encouraged. Equally, any discrimination towards those who voice what their religion is, or towards those who do not practice that or any religion, will not be tolerated.

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Sex, Gender and Gender Identity (including Gender Nonconforming identities and Transgender)

Sex discrimination occurs when someone is unfairly disadvantaged for reasons relating to their sex. This has been illegal in the UK for many years, however, the law is now part of the Equality Act 2010, with equal pay between men and women also being included. Gender reassignment discrimination is also included and protected against by the Equality Act 2010. While the law protects from sex and gender reassignment discrimination, the Community recognises that this does not encompass all aspects relating to gender. Gender identity is a person's innate sense of their own gender, whether male, female or another identity, which may or may not correspond to the sex assigned at birth. As such, the Community will ensure the equal treatment and inclusion of all gender identities for its employees and service users.

The Community will ensure there is no discrimination of employees due to expression of their gender identity, and will swiftly investigate any claims of discrimination, as it would for any protected characteristic of the Equality Act 2010. The Community will apply the same principles of non-discrimination to those who identify and express their gender.

The Community recognises that not all employees will be aware of different terminologies that can be used in relation to gender and gender identity. As such, please find a brief list below of some common terms and their meaning. This list is not exhaustive, and as such, should an employee encounter a term they are not familiar with, they should either research this to understand what it means, or sensitively ask the user of the term to explain what it means so that they can understand this.

Definitions:

- **Sex:** This is what people are assigned at birth, based on external genitalia. This often refers to biology and chromosomes.
- **Gender:** This is a social construct, made up of a set of "rules" and expectations. As such, people may identify as a different gender to the sex they were assigned at birth. This refers to people's own internal understanding about whether they are a man or a woman, both, something in between or neither.
- **Gender Reassignment:** This term refers to the process (typically involving a combination of medical procedures and hormone treatment) undertaken by a Transgender person in order to alter themselves, to match their gender identity. This can also mean changing names, pronouns, dressing differently and living in their self-identified gender.
- **Transgender:** This term (or its abbreviation, Trans) refers to someone whose gender does not align with the sex they were assigned at birth. As such, a transgender woman is someone who was assigned male at birth but has transitioned or is transitioning to express a female identity, and a transgender man is someone who was assigned female at birth but has transitioned or is transitioning to express a male

identity. Not everyone who identifies as Trans has undergone or will undergo medical procedures or hormone treatments. The importance is that they are expressing and self-identify as a different gender to the sex assigned at birth.

- **Cisgender:** This refers to people whose gender identity matches the sex they were assigned at birth.
- **Gender Nonconforming:** This is an umbrella term that includes anyone or anything that challenges and subverts gender expectations and stereotypes.
- **Non-binary:** This is an umbrella term for people whose gender is not just male or female. They do not subscribe to being just one or the other, and may feel like both, neither, or a combination.
- **Genderqueer:** This refers to people who may identify as neither gender, both, or a combination. They do not subscribe to the traditional gender binary.
- **Gender fluid:** This refers to people who feel that their gender can change and vary over time. They may move back and forth between different gender presentations and identifications.
- **Agender:** This term refers to people who might experience an absence of any gender feelings or affiliation.

Employees are expected to be respectful with the ways others identify their gender. Furthermore, where employees are made aware of others gender identity, they should ensure they use the correct pronouns (she/her, he/him, they/them). If they are unsure what pronouns to use, they should sensitively ask the individual which to use when referring or talking to them.

Additionally, if an employee or service user identifies as Transgender or non-binary, people should address that person by the name they have identified (and not any previous name they were known by, unless their name has not changed). Where Trans or non-binary people are referred to by their previous name, this is known as deadnaming and can be an upsetting and embarrassing experience.

Employees who are or plan to undergo gender reassignment procedures should inform HR of this. HR, in conjunction with the employee's line manager, will support the employee as much as possible through this process. This may include having time off (which may include a combination of absence leave and annual leave).

Harassment of any kind (including sexual harassment) will not be tolerated. The Worker Protection (Amendment of Equality Act 2010) Act 2023 ("Act"), which received Royal Assent on 26th October 2023, introduces a significant new duty on employers to take reasonable steps to prevent sexual harassment of their employees and workers. Please refer to the Harassment, Sexual Harassment, Bullying and Discrimination policy for further details on this.

The Community will base any employment decisions (such as recruitment, promotion, reward, redundancy, training etc.) on competencies, qualifications, skills, potential and objective job-related criteria obtained through analysis of job requirements and job performance.

Sexual Orientation

Discrimination on the grounds of sexual orientation is illegal in the UK and protected against in the Equality Act 2010. Sexual orientation is a person's emotional, romantic and/or sexual attraction to another person.

Discrimination arises when someone is treated less favourably because of their sexual orientation, including orientation to:

- persons of the same sex (lesbian, gay)
- persons of the opposite sex (straight)
- more than one gender (bisexual)

Discrimination on the grounds of sexual orientation includes how an individual chooses to express their sexual orientation, such as through their appearance.

The Community recognises that not all employees will be aware of different terminologies that can be used in relation to sexual orientation. As such, please find a brief list below of some common terms and their meaning. This list is not exhaustive, and as such, should an employee encounter a term they are not familiar with, they should either research this to understand what it means, or sensitively ask the user of the term to explain what it means so that they can understand this.

Definitions:

- **Heteronormative:** Denoting or relating to a world view that promotes heterosexuality as the normal or preferred sexual orientation.
- **Heterosexual:** When a person is attracted (emotionally, romantically or sexually) to a person of a gender other than their own. Largely refers to "straight" people.
- **Homosexual:** When a person is attracted (emotionally, romantically or sexually) to a person of the same gender as their own. Broadly refers to gay and lesbian people.
- **LGBTQIA+:** An acronym standing for Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, Intersex. The 'A' stands for Asexual or Ally, however, views on which can differ from person to person. The '+' refers to anyone else that is not included in the other terms that is different from the "norm" with regards to gender or sexual orientation.
- **Bisexual:** When a person is attracted to more than one gender. Largely this refers to an attraction (emotional, romantic or sexual) to both men and women.
- **Pansexual:** When a person is attracted (emotionally, romantically or sexually) to other people, not limited or constrained by what the other person's gender may be.

- **Polysexual:** When a person is attracted (emotionally, romantically or sexually) to many different genders, but not all genders.
- **Monosexual:** An attraction (emotionally, romantically or sexually) exclusively to one gender. This includes heterosexual people, gay men and lesbians.
- **Asexual:** an umbrella term which broadly refers to someone who doesn't experience sexual attraction.
- **Demisexual:** Included under the umbrella term asexual. This refers to conditional sexual attraction, generally to someone the individual knows well.

Many LGBTQIA+ people do not feel able to be 'out' at work. This may be due to fear of being harassed (or sexually harassed) or assaulted. Harassment of any kind (including sexual harassment) will not be tolerated. Being 'outed' (when a person tells others someone else's sexual orientation without permission to do so, particularly if they are not open about this at work or generally) is unacceptable and is included as a form of harassment, and will be viewed as such by the Community and anyone conducting investigations into such conduct. Please refer to the Harassment, Bullying and Discrimination policy for further details.

The Community will base any employment decisions (such as recruitment, promotion, reward, redundancy, training etc.) on competencies, qualifications, skills, potential and objective job-related criteria obtained through analysis of job requirements and job performance.

Neurodiversity (including Dyslexia, Dyspraxia, Autism and ADHD)

Neurodiversity refers to alternative thinking styles, which are natural forms of human neurocognitive variation. This includes, but is not limited to: autism, dyslexia, dyspraxia, and ADHD (attention deficit hyperactivity disorder).

An individual's neurodivergence may be regarded as a disability under the Equality Act 2010. However, the Community recognises and acknowledges neurodiversity as its own characteristic within the wider theme of diversity and inclusion. As such, the Community will extend the same principles as with other characteristics; to support the individuals and challenge any stigma or stereotypes. Each case will be assessed based on the employee's individual needs in conjunction with the employee, their line manager, and a HR Advisor or HR Business Partner.

The Community recognises that not all employees will be aware of different terminologies that can be used in relation to neurodiversity, particularly because many of these terms are new and only beginning to see prevalence. As such, please find a brief list below of some terms and their meaning. This list is not exhaustive, and as such, should an employee encounter a term they are not familiar with, they should either research

this to understand what it means, or sensitively ask the user of the term to explain what it means so that they can understand this.

Definitions:

- **Neurodiversity:** the biological reality of infinite variation in human neurocognitive functioning and behaviour. The term is now also being used to describe the fast emerging sub-category of workplace diversity and inclusion that focuses on including people who are neurodivergent.
- **Neurodivergent:** having cognitive functioning different from what is seen as 'normal' – it is a term that most neurodivergent people are comfortable with. People who are neurodivergent may be born as such i.e. it is genetic or innate, while others may become neurodivergent, such as in the case of brain trauma. A Community can be neurodiverse – an individual is likely better described as neurodivergent.
- **Neurodivergence:** the state of being neurodivergent. It's worth noting that a common misuse of language is to talk of 'an individual's neurodiversity' – better would be 'an individual's neurodivergence'.
- **Neurominority:** an individual Community such as autistic people, or dyslexic people, defined by sharing a similar form of neurodivergence. There is invariably great variety within each neurominority demographic.

The Community recognises that employees who are neurodivergent may find particular aspects of their work more challenging. In the first instance, employees who feel they need support in relation to their neurodivergence should discuss this with their line manager and/or a member of the HR team. The Community will make reasonable adjustments where possible to support the employee. As no two people are alike, a 'one size fits all' approach would not be beneficial to the individuals as their neurodivergence may be experienced in different ways or to varying extents. Therefore, the Community may ask employees to make an application to Access to Work, to better understand their individual needs. As part of the Access to Work process, employees will need to liaise with HR, as such, employees should do this prior to making an application.

Access to Work is a government programme to support people with disabilities in employment. If the help an individual needs at work is not covered by the employer making reasonable adjustments, it may be possible to get help from Access to Work, such as for special equipment, adaptations, a support worker or job coach. The Community will, where possible, follow any recommendations from the Access to Work Assessment, to better help and support the employee. For further information on this, and to make an application, please refer to the following website: <https://www.gov.uk/access-to-work>.

Where an employee discloses to their line manager, HR, or anyone else in the Community that they are neurodivergent, this should not be shared with others without prior consent

of the individual. In some circumstances, this information may need to be shared to ensure the wellbeing and appropriate support of the individual.

Often, people may mix up the terms, or not understand the difference between, 'mental health' and 'neurodiversity', however these are not the same. In short, if someone is neurodivergent this does not mean they have a mental health condition.

The Community will base any employment decisions (such as recruitment, promotion, reward, redundancy, training etc.) on competencies, qualifications, skills, potential and objective job-related criteria obtained through analysis of job requirements and job performance.

Commitment in working with Children and Young People

Within the Polaris Community, we believe in promoting equality, valuing diversity, and working inclusively. It is in the heart of everything we do to protect and promote young people's rights.

We want every young person to have the opportunity to fulfil their potential. This does not only mean that services should not discriminate against young people on grounds such as their gender, race, religion, age, sexuality or disability. It also means that services for young people should vary to meet their different needs and aspirations and should be pro-active in advancing equality, preventing discrimination and promoting good relations between different Communities. They should also work to help young people overcome barriers such as poverty, low aspirations, low educational attainment, communication or lack of parental support.

For our Children/Young People

- a. We encourage children/young people to develop respect for themselves and for others;
- b. We deliver services that recognise and build on the strengths of children and young people from all cultures, religions, gender, age, sexual orientation, ability and backgrounds; in ways that meet their unique and individual needs and help them to achieve their full potential;
- c. Children and Young People are offered opportunities to try out new experiences, which are not restricted by traditional gender options;
- d. Staff are expected to challenge attitudes, behaviour and language that are non-inclusive and discriminatory, in a positive way;
- e. Young People are given the opportunity to be cared for, educated and consulted and involved in decisions that affect them
- f. Young People are encouraged and supported to understand their rights and be well informed about ways of challenging discrimination;

- g. We recognise and celebrate the skills and talents of all children and young people to help them to participate fully in society
- h. We ensure that assessments of the child and the families specific needs is carried out with an aim to support and develop their full potential.
- i. Staff are suitably trained in all aspects of equality and diversity including legislation and their responsibilities
- j. Create an open and welcoming environment in which all members of the community are valued and empowered to take responsibility and make a positive contribution.

Polaris People (Diversity Group)

Polaris People is an initiative dedicated to ensuring the ongoing equality, diversity and inclusions efforts within the Community. This initiative provides a permanent voice for minority groups and their allies within the Polaris Community and act as an advocate for social justice. The aim is to create a safe space where everyone feels accepted and is empowered to be their true, authentic selves.

As part of this commitment, there are Diversity Champions for each business area – staff who volunteer will be involved in the various projects, events, and feedback that will help to shape and guide the Community’s commitment to equality, diversity and inclusion.

Amongst other events, Polaris People play a key role in organising ‘Core Events’, typically including: Neurodiversity Celebration Week, Mental Health Awareness Week, Pride Month, Disability Pride Month, and Black History Month.

General enquiries regarding the Polaris People Group or Equality, Diversity and Inclusion can be directed to the Polaris People group at PolarisPeople@polariscommunity.co.uk.

Summary of Changes since the last version:

- July 2025 – updated definitions for Diversity and Inclusion; added new term and definition within the ‘Sexual Orientation’ section; added contact information for the Polaris People group; various minor other edits
- July 2024 – includes references to The Worker Protection (Amendment of Equality Act 2010) Act 2023 (“Act”)
- August 2022 – merged various separate policies into one Equality, Diversity and Inclusion Policy, replacing all legacy policies