



**EQUITY, DIVERSITY AND
INCLUSION POLICY –
SERVICE DELIVERY**

**Effective from:
September 2025**

APPLICATION OF THIS DOCUMENT

YMCA St. Paul's Group (the Charity) is committed to making its services inclusive and accessible to all sections of the community by providing an environment responsive to the different cultures and groups to which its existing and prospective service users and customers belong.

This document sets out the Charity's approach to Equity, Diversity and Inclusion (EDI) in its service delivery. It applies to all our customers, Board and Committee members, staff, volunteers, and contractors and all our services and activities within all legal entities within the Group.

This document operates alongside the Charity's Strategic Plan and other policy documents, in particular the Workforce EDI policy.

1. Policy Statement

- 1.1 YMCA St. Paul's Group is a place where everyone will be respected, valued, and welcomed.
- 1.2 We will help ensure fair treatment regardless of someone's age, disability (whether mental or physical), gender, (including gender reassignment), religion or belief, race, marital or family status; sexuality or sexual orientation; pregnancy/maternity.
- 1.3 We are committed to creating a customer focused culture, ensuring that EDI is embedded in our service delivery, values, behaviours, policies and procedures.
- 1.4 In order to do this, we will:
 - ▶ aim to eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Equality Act 2010.
 - ▶ aim to advance equality of opportunity between those who share a relevant protected characteristic and those who do not share it.
 - ▶ foster good relations between those who share a relevant protected characteristic and those who do not share it and promote community cohesion between different communities.
 - ▶ ensure we meet our duties under the Equality Act 2010. We are committed to improving equality practice for all our existing and prospective service users and customers and will make adequate resources available to do this.
- 1.5 Advancing equal opportunities means:
 - ▶ removing or reducing the disadvantage that people with protected characteristics face;
 - ▶ provide opportunities for people to voice their needs and taking steps to meet the specific needs of people with protected characteristics;
 - ▶ encouraging and supporting people with protected characteristics to participate fully in our activities, especially where they are underrepresented.

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- 1.6 Fostering good relations means we are taking action to reduce prejudice and increase understanding between different groups of people.

2. Objectives of this policy

2.1 This document sets out how we will ensure:

- a) services are easily accessible and are capable of responding to the different and changing needs of our existing and prospective service users/ customers.
- b) we can identify and take action to combat discrimination in service delivery on the grounds of any of the protected characteristics, or on any other ground, which cannot be justified.
- c) vulnerable service users/ customers are identified and supported.
- d) economic inequalities are addressed.
- e) heritage and diversity is celebrated.
- f) consultation and engagement activities are effective and inclusive.
- g) equality is promoted in partnerships and procurement.
- h) our workforce is committed to equality and reflective of the diverse communities it serves.

3. Definitions & Meanings

3.1 **Customer(s):** for ease, in the remainder of the document, we will refer to any existing or prospective service users and customers as customer(s). This includes all services delivered by the Charity and any legal entity within the group, including supported housing, youth work, childcare, counselling, physical activity services, catering, etc.

3.2 **Community services:** for ease we refer to our children services (including childcare), youth services, all Health & Wellbeing services (including catering, gyms, fitness classes, sports activities and counselling) and room hire as community services.

3.3 **Protected Characteristic(s):** refers to the nine protected characteristics, as set out in the Equality Act 2010, on the grounds upon which discrimination is unlawful. See appendix 1 for the full list.

3.4 Diversity, Equity & Inclusion:

- ▶ **Diversity** means celebrating difference and valuing everyone; each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions. This is beneficial not only for the individual but for the Charity too.
- ▶ **Equity** is about fair treatment, equality of opportunity and fair access to information and resources for all individuals the Charity comes into contact with.
- ▶ **Inclusion** is a sense of belonging feeling respected and valued for who you are, feeling a level of support, energy and commitment from others around you.

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We acknowledge that equity and diversity are not inter-changeable but interdependent. There can be no equality of opportunity if difference is not valued and harnessed.

3.5 The Charity's Values:

As a Christian Organisation we ensure that our values, by their very definition, advocate our commitment to Equity, Diversity and Inclusion in everything we do. They are:

- ▶ **Loving:** We expect to be generous with our kindness, compassion and respect, treating others as we would like to be treated ourselves.
- ▶ **Hopeful:** We know that everyone is unique, and we want to resource and equip people so that they can hope for a better future and make the best decisions.
- ▶ **Community focused:** We value all people, of faith and none and welcome all by celebrating diversity and challenging inequality. Within our internal teams, customers and other community collaborators we recognise the best solutions are co-created.
- ▶ **Person centred:** We place relationship at the heart of all we do, knowing that we grow better together. We will consider the thinking, emotions, personality and situation of each individual and we will draw out and support resilience, learning and transformative personal development.
- ▶ **Holistic:** We understand that everyone has the potential for wholeness in body, mind and spirit and commit to encouraging and empowering others to grow.

3.6 Psychologically Informed Environment (PIE):

In the simplest way, PIE is about making sure that we offer the best experience to our customers, some of whom will have experienced trauma. That also means making sure we create a more inclusive and supportive workplace and service delivery environment. This involves recognising the psychological needs of all customers and staff and ensuring that organisational practices and policies value the psychological needs of all staff and customers, fostering a culture of respect, understanding, and well-being.

- ▶ **Inclusive Language:** PIE emphasises using language that is respectful and avoids labelling or stigmatizing individuals, aligning with EDI principles.
- ▶ **Support for Staff:** PIE promotes staff training and support to enable them to work more effectively with customers who may have complex trauma or other mental health needs, a key aspect of a supportive EDI environment.
- ▶ **Physical Environment:** PIE considers the physical environment and its impact on individuals, including creating spaces that are accessible, inclusive, and promote psychological safety.
- ▶ **Policy and Procedure Review:** PIE encourages a review of organisational policies and procedures to ensure they are psychologically informed and do not unintentionally create barriers or disadvantage individuals based on their mental health or other protected characteristics.
- ▶ **Relationship Building:** PIE emphasises the importance of building positive and supportive relationships, which is crucial for creating an EDI-friendly environment where customers and staff feel safe and valued.

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- ▶ **Psychological Safety:** PIE focuses on creating a psychologically safe and secure environment for all customers and staff, promoting open communication and addressing issues of discrimination or harassment effectively.
- ▶ **Evidence-Based Practice:** PIE emphasises using evidence-based approaches to understand and address the needs of individuals, ensuring that interventions are effective and appropriate.

4. Implementing this policy

We will implement this policy by:

- 4.1 Ensuring our Board of Trustees, Executive Team and Resident Representative Committee and any other appropriate customer representative group oversee and scrutinise the delivery of this policy.
- 4.2 Ensuring our staff are aware of this policy alongside the workforce Equity, Diversity and Inclusion (EDI) Policy and receive appropriate training.
- 4.3 Ensuring our customers are aware of this policy by making it available in a number of formats.
- 4.4 Providing customers with clear, accessible, relevant, timely and appropriate information; ensuring services are accessible and that accessibility is publicised to customers.
- 4.5 Supporting any EDI groups established within the Charity and linking them in with the annual reporting process. This will include for example, the Charity's Employee Resource Groups (ERGs) which have been established to represent different groups of staff and the Resident Representative Committee.
- 4.6 Ensuring that all partners and contractors have rigorous and appropriate EDI policies covering employment and service delivery which meet the requirements of the Public Sector Equality Duty (PSED) where necessary.
- 4.7 Linking with external and internal inspections and reviews that cover EDI performance in service areas as part of wider improvement measures.
- 4.8 Ensuring that equality objectives are regularly set, monitored and reviewed as part of the business planning process.
- 4.9 Ensuring we understand the diverse needs of our customers by collating and analysing relevant information.
- 4.10 Where the Charity delivers services that fall within the Public Sector Equality Duty (PSED), it must ensure that an Equality Impact Assessment (EIA) is carried out. This applies to all service restructures or reorganisations, new services, service reviews, and the creation or review of relevant policies or functions, to consider any potential EDI impact.
- 4.11 Working with customers to help develop, monitor and review our policies, practices, functions and services.

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4.12 Promoting equity and diversity within our communities and in line with local authority partners' strategies.

4.13 Publishing and providing an effective complaints procedure that allows for satisfactory resolution.

5. Specific commitments in relation to service delivery

5.1 Meeting the needs of our customers

- a) We will ensure that information about our services is available in a range of different formats that meet the diverse needs of our customers and communities. This includes our digital presence. We will ensure our website is as accessible as possible for all our customers.
- b) We will provide a range of contact methods, shaped by customers' requirements, including in person, by phone or in writing. We will also make effective use of additional services where required.
- c) We will value linguistic diversity and provide or seek support for customers as required, including interpretation and translation services, hearing loops, support with enrolment on ESOL courses, etc.
- a) We understand the importance of communicating effectively with a diverse audience and reflecting this diversity in our marketing material, social media, website accessibility and building signage.
- b) We ensure we use non stereotypical images in order to help overcome preconceived ideas of gender, ethnic origin, culture or religion.
- d) We will ensure our actions are informed by maintaining the data we need about our customers. We will use this both to tailor services to individual needs and to identify trends across our customer base as a whole.
- e) We will take into account the individual circumstances of a customer, their protected characteristics, equality legislation and any pre-action protocol requirements, prior to taking legal action against a vulnerable person. We will only proceed where we meet the legislative and pre-action protocol requirements and/or where the customer has failed to engage with us, and the measures put in place to address the specific issues related to the customer.
- f) We will consider equity and diversity issues when involving people in planning, developing and in the delivery of our services including providing a range of opportunities for customers to have their say on decisions that affect them and to scrutinise our performance.
- g) We will monitor customer satisfaction and complaints across our services with the aim of using the information gathered to improve service delivery, ensuring there are no significant differences in customer experience across the protected characteristics, and identifying opportunities to promote equity and diversity.
- h) We are committed to providing accessible and inclusive environments for all individuals using our services and will design and maintain buildings and services to be physically accessible to as many people as possible. Where required, we will ensure appropriate aids and adaptations are made available, including physical changes to the environment and assistive technology. Our premises

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are reviewed regularly to ensure they meet accessibility standards, with steps taken to reduce or eliminate barriers (e.g. installing ramps, ensuring adequate lighting, and using signage suitable for those with visual impairments). We actively seek feedback from service users and staff to improve our spaces and will consult with relevant professionals where specialist advice is needed.

5.2 Providing homes/ supported housing

- a) When letting a property, no customer or potential customer will be discriminated against because of a protected characteristic. Our homes will be let in a fair and transparent manner.
- b) We will review the condition and suitability of our existing and new homes ensuring that they meet the requirements of the Decent Homes Standard and are safe, modern, efficient and comfortable for all our customers' needs and requirements.
- c) In planning investment in our homes, we will work with stakeholders and partners who recognise the importance of working for and with customers and communities, seeking feedback from customers on their experience of their new home.
- d) We will identify those with additional support needs and provide or procure the advice and any specialist support they may need to sustain their tenancy. This could include signposting customers to specialist organisations.
- e) We will ensure that all housing customers are allowed to be supported by a representative or advocate in interactions about landlord services.

5.3 Providing community services

- c) We will ensure that our community services reflect the diversity and needs of each unique local community and admission policies to those services are fair and transparent.
- d) We will provide affordable activities, concessions and in case of our youth work, free services, to ensure cost is not a barrier to participation. For our early years work, we will support parents and carers to access available funding where necessary and available.
- e) We will listen to both our staff and customers to implement change to remove barriers to participation including training staff to be sensitive to the special needs of any customer in promoting participation and access.
- f) We will monitor customer participation and feedback to identify and develop opportunities for continuous improvement.
- g) Our children's work promotes a positive self-image to all children and respects their individuality, planning for all children according to their needs, irrespective of their gender, race, religion or ability. Every child is included and not disadvantaged because of home language, culture or religion, family background, learning difficulties or disability. We provide books, materials and equipment that are multicultural and non-sexist, and positive images of all groups including the disabled. We aim to develop children's positive self-esteem and the esteem of others and will set a good example by treating one another and the children with respect.

5.4 Contractors, partners and suppliers

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- a) We will ensure that our contractors, partners and suppliers are aware of the importance of equity and diversity to us and that they sign up to/support our commitments.
- b) We will ensure such organisations have a current EDI policy, and where not, that they are willing to work in accordance with our EDI policy.
- c) We will help partner organisations to understand the diverse needs of our customers in order that they are better equipped to provide an inclusive service to all our customers.

6. Roles & Responsibilities

6.1 Our Board of Trustees are responsible for:

- ▶ Overall strategic accountability for EDI.
- ▶ Having a clear and active commitment to achieve equity of opportunity, diversity and inclusion in all of the Charity's activities (as well as in its own composition) as set out in the Code of Governance.
- ▶ Approving the EDI commitments contained in the Strategic Plan and Customer Involvement, Engagement & Empowerment Charter.
- ▶ Ensuring that there are policies and procedures in place to reflect its values and its commitments to EDI.
- ▶ Regularly receiving and understanding the performance around EDI, including monitoring of progress against any related strategy or action plans.
- ▶ Approving the EDI Strategy, overarching EDI Statement, EDI Service Delivery policy and the workforce EDI policy.

6.2 Our Executive Team are responsible for:

- ▶ Recommending the EDI Service Delivery and workforce EDI policies for Board approval and reporting requirements that deliver equity of opportunity, diversity and inclusion in all areas of the business.
- ▶ Ensuring the ERGs and Resident Representative Committee (or any other customer representation groups) have clear remits in relation to this policy and its implementation and monitoring.
- ▶ Role modelling the desired values and behaviours and setting clear expectations as to standards required across the organisation in relation to EDI.
- ▶ Ensuring the implementation of our EDI activities and commitments are understood and supported from across the whole senior management team.
- ▶ Ensuring legal and regulatory requirements and our policy commitments are met.

6.3 The Employee Resource Groups (ERGs) and Resident Representative Committee are responsible for:

- ▶ Raising awareness on matters relating to EDI.

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- ▶ Analysing the Charity’s performance in EDI via, for example, deep dives of service areas and establishing recommendations and actions.
- ▶ Reviewing EDI benchmarking data to provide an insight into the Charity’s performance in EDI and identify the options required to achieve desired diversity and inclusion outcomes.
- ▶ Establishing EDI initiatives that are relevant and actionable.

6.4 Our Service Managers are responsible for:

- ▶ Setting the environment, role modelling the desired values and behaviours and setting clear expectations as to standards required across their teams in relation to EDI.
- ▶ Ensuring their staff undertake all the necessary training in relation to EDI.
- ▶ Encouraging their staff to complete the EDI questionnaire so we have a clearer picture of our workforce and how representative it is of our customers.
- ▶ Immediately addressing any issues with harassment or discrimination and using the various policies and processes in place to tackle any breaches of this policy.

6.5 All staff and volunteers are responsible for:

- ▶ Ensuring that our policy and our values relating to equity, diversity and inclusion are incorporated in their work activities, in all dealings with customers, colleagues and anyone else they come into contact with, in the course of delivering the service.
- ▶ Undertaking all mandatory and necessary training in relation to EDI.
- ▶ Encouraging customers to complete EDI information when asked, so we have a clearer picture of our customers and how representative our workforce and governance membership is.
- ▶ Understanding the diverse needs of our customers in order that they are better equipped to provide a welcoming environment for customers, colleagues and other stakeholders.

6.6 Contractors and suppliers are responsible for:

- ▶ Ensuring that they have a current EDI policy, and, where not, that they adhere to the Charity’s EDI policy.

7. Policy Breaches

- 7.1 All employees and volunteers should understand that they, as well as the Charity, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, volunteers, service users, suppliers and the public.
- 7.2 The Charity takes a strict approach to staff breaches of this policy, which will be dealt with in accordance with its Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal without notice.

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7.3 The Charity also takes a strict approach to customer breaches of this policy, which will be dealt with in accordance with relevant procedures and terms and conditions of service delivery. Depending on the severity this could include eviction or termination of service.

7.4 If a customer believes that they have suffered discrimination, the matter can be raised through the Charity’s Complaints Policy. Complaints will be treated in confidence and investigated as appropriate.

8. Monitoring and Evaluation

8.1 Regular customer satisfaction surveys for transactional or service-based delivery will be carried out and analysed against the protected characteristics, to ensure that we consider what the causes are of any material or significant differences compared to benchmarking averages (where available).

8.2 We will use available data, resources and tools to compare our EDI data with communities and where possible, benchmark with peers.

8.3 Records of EDI training are kept on our Learning Management system for all staff.

8.4 This policy will be reviewed regularly by the Executive Team to judge its effectiveness, or updated sooner in accordance with changes in legislation. This review should include consultation with the Resident Representative Committee and any other relevant customer representation groups as well as the Employee Resource Groups (ERGs).

9. APPENDICES

Appendix 1	Protected Characteristics
Appendix 2	Types of Unlawful Discrimination

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Protected Characteristics

YMCA St. Paul's Group recognises its responsibilities under equality and diversity legislation and implements its duties as set out under the Equality Act 2010.

The Act covers nine protected characteristics on the grounds upon which discrimination is unlawful:

- ▶ **Age:** referring to a person belonging to a particular age (for example, 42-year-olds) or range of ages (such as 18- to 30-year-olds).
- ▶ **Disability:** a person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Different disabilities will have different effects on peoples' lives; a person with mobility impairment may require ramps, a lift or handrails to help them get into and around buildings; a person with a visual impairment will require written documentation in either a larger font or a different format altogether. The Equality Act 2010 places duties on providers of services to make reasonable adjustments to the way the service is provided. This can mean that people with a disability can receive favourable treatment to make sure they receive the same services as the wider community.
- ▶ **Gender reassignment:** Gender reassignment is the process of transitioning from one gender to another. In the Equality Act, gender reassignment means proposing to undergo, undergoing or having undergone a process to reassign your sex. To be protected from gender reassignment discrimination, you do not need to have undergone any medical treatment or surgery to change from your birth sex to your preferred gender. You can be at any stage in the transition process, from proposing to reassign your sex, undergoing a process of reassignment, or having completed it. It does not matter whether or not you have applied for or obtained a Gender Recognition Certificate, which is the document that confirms the change of a person's legal sex.
- ▶ **Marriage and civil partnership:** marriage is defined as a union between a man and a woman or between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.
- ▶ **Pregnancy and maternity:** pregnancy is the condition of being pregnant. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
- ▶ **Race:** refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins
- ▶ **Religion or belief:** religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

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- ▶ **Sex:** a reference to a man or to a woman.
- ▶ **Sexual orientation:** whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

YMCA St. Paul's Group will not tolerate less favourable treatment on the grounds of any of the protected characteristics or on any other grounds that cannot be justified.

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Types of unlawful discrimination

The types of unlawful discrimination are set out below.

- ▶ **Direct discrimination** is where an individual is treated less favourably than another because of a protected characteristic. In limited circumstances in relation to employment, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.
- ▶ **Indirect discrimination** is where a condition, rule, or practice is applied that applies to everyone, but particularly disadvantages people who share a protected characteristic and it cannot be shown to be a proportionate means of achieving a legitimate aim.
- ▶ **Harassment** is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. Staff will be able to complain of behaviour that they find offensive even if it is not directed at them and the complainant need not possess the relevant characteristic themselves. It does not matter whether or not this effect was intended by the person responsible for the conduct.
- ▶ **Associative discrimination** is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).
- ▶ **Perceptive discrimination** is where an individual is directly discriminated against or harassed because others think that the individual has a particular protected characteristic. It applies even if the person does not possess the characteristic (other than marriage and civil partnership, and pregnancy and maternity).
- ▶ **Discrimination arising from disability** is when a disabled person is given unfavourable treatment where the reason for the unfavourable treatment is not the disability itself, but something that arises in consequence of the disability. Unlike direct discrimination, in this case, there is no need for the disabled person to compare themselves with anyone else. They just need to show that they were treated unfavourably and that this treatment was linked to their disability.
- ▶ **Third-party harassment** occurs where an employee is harassed and the harassment is related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity), by third parties such as customers. For an employer to be liable:
 - a) the harassment must have occurred on at least two previous occasions
 - b) it must be aware that the previous harassment has taken place
 - c) it must have failed to take reasonable steps to prevent harassment from happening again

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- ▶ **Victimisation** occurs when an employee is subjected to a detriment because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare their treatment with someone who has not made or supported a complaint under the act.

- ▶ **Failure to make reasonable adjustments** is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared to someone who does not have that protected characteristic and the organisation has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

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