



IMPACTFUL GOVERNANCE
Community Interest Company

Diversity, Equality and Inclusion Policy & Implementation Plan 2026

Impactful Governance actively encourages equal treatment, diversity and inclusion processes within our recruitment, workforce and customers, challenging discrimination and making adjustments where possible.

We are LGBTQ+ led and members of the Gay Professional Network and Out Britain; actively including all members of society, involving the LGBTQ+ community which supports interactions with other LGBTQ+ organisations.



We encourage full participation from LGBTQ+, BAME and Disability community and staff membership in all of our activities and make necessary and reasonable adjustments.



We are a Disability Leading organisation and accredited



The aim is for our workforce to be inclusive in working practices, of all sections of society and for each employee and client to feel respected.

The organisation is also committed against unlawful discrimination.

Our LGBTQ+ research report for Watford is the basis of our current understanding locally.

The policy's purpose is to:

- Provide equality, fairness and respect for all in our employment or volunteering whether temporary, part-time or full-time.
- Not unlawfully discriminate due to the definitions within the Equality Act 2010 "protected characteristics" of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation.
- Oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

The organisation commits to:

- Encourage equality, diversity and inclusive thinking into the workplace or work environment as good practice and make social, ethical and business sense.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
- This commitment includes everyone reminding all employees and volunteers about their rights and responsibilities under the Equality, Diversity and Inclusion Policy. Responsibilities include

staff and volunteers conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, service users, suppliers, visitors, the public and any others in the course of the organisation's work activities.

Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

- Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.

Staff and volunteers commit to:

- Understand that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

This Diversity, Equality & Inclusion Policy is fully supported by management and the Directors.

Details of the organisation's grievance and disciplinary policies and procedures can be found on our website. This includes with whom an employee should raise a grievance – usually their line manager.

Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

Staff are often faced with situations which challenge them. It is important to work within the law while acknowledging individual rights. There are seven Acts of Parliament that are directly relevant:

1. Part-time Workers Regulations (2020)
2. Rehabilitation of Offenders (1974) and amendments (2020)
3. Marriage (Same Sex Couples) Act (2013)
4. Equality Act (2010) and the Amendment Order (2012)
5. Mental Health Act (1983) and the Mental Capacity Act (2005)
6. Gender Recognition Act (2004)
7. Civil Partnership Act (2004)
8. Sexual Offences Act (1985) and updated Sexual Offences Act (2003)
9. Workplace protection - sexual orientation (2003).
10. Fixed Term Employees Regulation 2002
11. Human Rights Act (1998)
12. Criminal Justice (Scotland) Act.(1980)
13. Sexual Offences Act (1967)

Relationships and Sex Education in schools (2019)

The Department for Education is introduced compulsory Relationships Education for primary pupils from February 2019 and Relationships and Sex Education (RSE) for secondary pupils from September 2020. Also, from September 2020 it will be compulsory for all schools to teach Health Education. Resources available for Learning Disabilities from Times Educational (TES):

<https://www.tes.com/teaching-resources/blog/sre-students-learning-difficulties>

Sexuality

Sexuality is not the physical act of sex. Sexuality is about sexual feelings, thoughts, attractions and behaviours towards other people. Finding each other physically, sexually or emotionally attractive are a part of individual sexuality.

Sexuality is diverse and personal, and it is an important part of who a person is.

Discrimination on the grounds of Sexuality is unacceptable. Any discrimination issues must be brought to the attention of the Customer Service Director.

This guidance relates to:

- gender identity – the sense that we are male or female or not aligned with either gender.
- sexual orientation, including heterosexual, homosexual and bisexual.
- personal dress, body image, personal grooming and sexual expression.

LGBTQ+

LGBTQ+ describes the lesbian, gay, bisexual, and transgender community. The first three letters (LGB) refer to sexual orientation. The 'T' refers to Transgender identity. The '+' stands for intersex, these are people born with undetermined or both sets of genitals. The '+' stands for other spectrum of sexuality or gender identities, such as non-binary and Trans-sexual.

Impactful Governance has a Legal Duty to enable equality, diversity and human rights in our service, including for our staff, clients and volunteers. We promote LGBTQ+ inclusive practices. LGBTQ+ people need to be proactively supported by staff who understand the need to adequately balance risk and responsibility toward the individual concerned. This will help LGBTQ+ people to form and maintain personal, loving, intimate and sexual relationships as well as express creativity and feel safe.

Everyone, including those with a learning disability, has different ways of expressing their sexuality; and this is part of their personality. Most people with learning disabilities develop physically within the parameters generally exhibited in the population at large, but in some cases their emotional and social development may be slower.

Cultural, religious or non-religious backgrounds

When considering a person's cultural and religious background, we understand that culture is not fixed; assumptions about a person's cultural, religious and ethnic background are not used when planning or providing projects.

Age

We offer a broad range of projects and have a diverse age group within our client base, organisations and staff. Wherever possible we will make reasonable adjustments and take into account people's age in a positive manner, to make reasonable adjustments and communicate in a way that suits the audience.

Transgender process for DBS checks

This process is for transgender applicants who do not wish to reveal details of their previous identity to the person who asked them to complete an application form for a DBS check. For more information about the transgender process, email sensitive@dbb.gov.uk or see the DBS Transgender Applications guidance.

Discrimination

Discrimination can be either direct or indirect.

Direct discrimination is when an individual is treated less favourably, based on a protected characteristic, such as disability, race, age, gender, etc.

Indirect discrimination is when there is a particular disadvantage for a particular group of people because requirements are applied – for example to a job or a service – or policies or practices adopted which cannot be justified as fair and reasonable.

Harassment is an act of discrimination, which is unwanted conduct by one person, or a group, which violates the dignity of another person, or group, or creates an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment might be perceived by a third party and pursued using the channels available.

Disability

We are accredited to the Department of Work & Pensions standards as: "Disability Confident Committed" (Level 1) and a "Disability Confident Employer" (Level 2) & "Disability Leader" (Level 3).



This policy and the consequential procedures have been adopted by: "Impactful Governance" (the organisation) by its Directors.

Signed and endorsed by.....

A handwritten signature in blue ink, appearing to read "Andrew Waite".

PRINT NAME IN CAPITALS. ...Andrew Waite (Chief Executive)..

(a signed copy is also held in every individual staff personnel files)

Commented [1]: Please sign and print your name below.

Date of last review	Sept 2026
Date of next review	Oct 2027
Date it was first implemented	Aug 2017
Author(s)	Chief Executive & Board
Audience	All Directors, Consultants, Employees, Volunteers and Stakeholders.
Other relevant policies and/or procedures	Conflicts of Interest Policy, Data Retention, Whistle Blowing policy, Disciplinary policy.
Where it is saved	www.ig-cic.org.uk

Please sign and rerun a copy of this policy by email or post to:

Impactful Governance. Attn: Andrew Waite (Chief Executive)

Registered Office: The Old Free School, George Street, Watford, Hertfordshire WD18 0BX

Telephone: 01923 231660 website www.ig-cic.org.uk

Equality, Diversity & Inclusion Implementation Plan

Appendix A – Implementation Plan

Impactful Governance				
Andrew Waite – Chief Executive (Name of Employer/Senior manager)		has overall and final responsibility for health and safety		
Alexandre Oliveira – Customer Service & Finance Director (Member of staff)		has day-to-day responsibility for ensuring this policy is put into practice		
Statement of general policy	Responsibility of: Name/Title	Action/Arrangements (What are you going to do?)	By When?	
- Encourage equality, diversity and inclusive thinking into the workplace or work environment as good practice and make social, ethical and business sense. - Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued. - This commitment includes everyone reminding all employees and volunteers about their rights and responsibilities under the Equality, Diversity and Inclusion Policy.	Andrew Waite – Chief Executive	Induction procedure includes distribution and reading of this policy and Implementation Plan	Sent by email or post before commencing employment. Introduced on day 1 of induction.	
	Alexandre Oliveira – Customer Service & Finance Director	Discussions with all participants at walks, presented by the Work Coach and Lead Walker together.	Introduced on day 1 of enrolment.	
	All Directors: Andrew Waite, Alexandre Oliveira, Veronica Garbett	Team meetings address Equality, Diversity & Inclusion	Monthly	

- Responsibilities include staff and volunteers conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination. - Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, service users, suppliers, visitors, the public and any others in the course of the organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence. - Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full	Project Leads	Equality & Diversity Training is conducted as part of an induction for all staff.	At the start of project, before operational activity commences.
	Alexandre Oliveira – Customer Service & Finance Director	A complaints procedure is clearly visible on website and accessible to all employees, volunteers and learners.	At induction and enrolments.
	Customer Service Director	Discussions at quarterly reviews with staff.	Quarterly.
	Andrew Waite – Chief Executive		

potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation. - Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act). - Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law. - Review Annual Pay-scales to ensure there is no disparity on gender pay-gaps <u>Staff, participants and volunteers commit to:</u> - Understand that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public. This Diversity, Equality & Inclusion Policy is fully supported by management and the Directors.	Alexandre Oliveira – Customer Service Director	Discussions with Learners during Mentoring. Discussions with staff during appraisals.	Cyclical every 4 weeks.
		Review of Policies at Director Meetings.	Annually
	Andrew Waite – Chief Executive	Annual Pay Scales are published each September to match national Teacher Pay scales.	Annually
	All team members: Staff & Volunteers.	Open and transparent dialogue during 1-1 meetings.	Weekly where necessary.
	All Directors: Andrew Waite, Alexandre Oliveira Veronica Garbett Internal Quality Assurance (IQA)	All learners are made aware through our website and at the start of courses. Adjustments are made for Disabilities, including Braille	

Details of the organisation's grievance and disciplinary policies and procedures can be found on our website. This includes with whom an employee should raise a grievance – usually their line manager. Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination. Staff are often faced with situations which challenge them. It is important to work within the law while acknowledging individual rights. There are seven Acts of Parliament that are directly relevant: 14. Part-time Workers Regulations (2020) 15. Equality Act (2010) and the Amendment Order (2012) 16. Mental Health Act (1983) and the Mental Capacity Act (2005) 17. Sexual Offences Act (1985) and updated Sexual Offences Act (2003) 18. Fixed Term Employees Regulation 2002 19. Human Rights Act (1998) 20. Rehabilitation of Offenders (1974) and amendments (2020)		overlays, magnifying laptops and audio checks. Literature is produced in point 16 where-ever possible and line spacing is used for presentations. Induction covers all aspects of performance in addition to a staff code of conduct policy.	
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<u>Relationships and Sex Education in schools (2019)</u> The Department for Education is introduced compulsory <u>Relationships Education for primary pupils from February 2019 and Relationships and Sex Education (RSE)</u> for secondary pupils from September 2020. Also, from September 2020 it will be compulsory for all schools to teach Health Education. Resources available for Learning Disabilities from Times Educational (TES): https://www.tes.com/teaching-resources/blog/sre-students-learning-difficulties	Chief Executive	Where projects involve young people or vulnerable adults, discussions within the staff team and partner organisations take place.	As needed.
<u>Sexuality</u> Sexuality is not the physical act of sex. Sexuality is about sexual feelings, thoughts, attractions and behaviours towards other people. Finding each other physically, sexually or emotionally attractive are a part of individual sexuality. Sexuality is diverse and personal, and it is an important part of who a person is. Discrimination on the grounds of Sexuality is unacceptable. Any discrimination issues must be brought to the attention of the Customer Service Director. This guidance relates to: • gender identity – the sense that we are male or female or not aligned with either gender.	Andrew Waite – Chief Executive	Membership of the Gay Professional Association. Active encouragement to express individuality. Active promotion and facilitation of discussions for other organisations about sexuality at Board level.	Ongoing information sharing and knowledge gathering at meetings.

• sexual orientation, including heterosexual, homosexual and bisexual. • personal dress, body image, personal grooming and sexual expression. <u>Pride Parade Events</u> 1. Stevenage Pride 2. Watford Pride Picnic (our event) 3. Stort Pride (Bishops Stortford) 4. Herts Pride (Watford) 5. North Herts Pride (Hitchin) 6. Tring Pride (Our Event) 7. South Oxhey Pride (our event) 8. London Pride Parade 9. Luton Pride	Andrew Waite – Chief Executive	Sponsorship or attendance at Pride Events. Locally or nationally.	1. May/June each year as part of Stevenage Day. 2. June each year for Pride Month. 3. July 4. August 5. August 6. June/July/Aug 7. June/July/Aug 8. June 9. July
<u>LGBTQI+ & Gender Recognition</u> LGBTQI+ describes the lesbian, gay, bisexual, and transgender community. The first three letters (LGB) refer to sexual orientation. The 'T' refers to Trans (inc Transgender) identity. The '+' stands for other spectrum of sexuality or gender identities, such as non-binary and A-sexual. The "i" stands for intersex, these are people born with undetermined or both sets of genitals Impactful Governance has a Legal Duty to enable equality, diversity and human rights in our service, including for our staff, clients and volunteers.	Alexandre Oliveira: Customer Service Director Andrew Waite Chief Executive	Equality & Diversity Training is conducted as part of an induction for all staff. Co-wrote Hertfordshire Partnership University NHS Foundation Trust (HPFT) "Gender Identity Policy 2024"	At the start of project, before operational activity commences. Review annually

We promote LGBTQ+ inclusive practices. LGBTQ+ people need to be proactively supported by staff who understand the need to adequately balance risk and responsibility toward the individual concerned. This will help LGBTQ+ people to form and maintain personal, loving, intimate and sexual relationships as well as express creativity and feel safe. Everyone, including those with a learning disability, has different ways of expressing their sexuality; and this is part of their personality. Most people with learning disabilities develop physically within the parameters generally exhibited in the population at large, but in some cases their emotional and social development may be slower. <u>Cultural, religious or non-religious backgrounds</u> When considering a person's cultural and religious background, we understand that culture is not fixed; assumptions about a person's cultural, religious and ethnic background are not used when planning or providing projects.	Chief Executive	Taking a secular approach to those who have religious beliefs and those that have none. We do not show bias or favour towards any religious group or organisations and will embrace all faiths and none in fair and equal measure. Where discrimination or conflicts arise with religious or sexual beliefs, these are	Ongoing, as arises.
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Age We offer a broad range of projects and have a diverse age group within our client base, organisations and staff. Wherever possible we will make reasonable adjustments and take into account people's age in a positive manner, to make reasonable adjustments and communicate in a way that suits the audience.	Alexandre Oliveira – Customer Service Director	always challenged in allowing full participation on our activities and projects. We offer a full range of age-specific and generic activities including: 16-24 year olds. 40+ years old 50+ years old 65+ years old Where we have a gap, we seek to redress.	Reviewed at Directors meetings bi-monthly.
Discrimination Discrimination can be either direct or indirect. Direct discrimination is when an individual is treated less favourably, based on a protected characteristic, such as disability, race, age, gender, etc.	All team members: staff & volunteers	Issues of any discrimination will be raised with the Line Manager and dealt with swiftly to ensure complete equality, diversity and inclusion.	Ongoing
Indirect discrimination is when there is a particular disadvantage for a particular group of people because requirements are applied – for example to a job or a service – or policies or practices adopted which cannot be justified as fair and reasonable. Harassment is an act of discrimination, which is unwanted conduct by one person, or a group, which violates the dignity of another person, or group, or creates an intimidating, hostile, degrading, humiliating or offensive environment	Project Leads	Equality is embedded in personal development / staff appraisal processes. Remedial action is taken to address under-performance within this policy. This includes partners and stakeholders where under-representation is identified or inequalities emerge.	Quarterly reviews

for them. Harassment might be perceived by a third party and pursued using the channels available. <u>Disability</u> We are accredited to the Department of Work & Pensions standards. <u>Monitoring of staff equality</u> characteristics are published in our Impact Report. We strongly believe in employing and working with inclusive people and the characteristics are an indication used to review the blend of talent within the organisation that covers full representation.	Andrew Waite: Learning Disability specialist. Chief Executive and Directors	“Disability Confident Committed” (Level 1) “Disability Confident Employer” (Level 2). “Disability Confident Leaders” (Level 3) We check our team equality, inclusion and diversity annually and make adjustments where necessary to balance our equitable approaches.	 <u>2023 equality:</u> 73% Women 40% BAME – Black, Asian, Minority or Ethnic, 33% LGBTQ+ 13% Disabled <u>2024 equality (Board):</u> 33% Women 66% BAME 66% LGBTQ+ 66% Disability <u>2025 – 26 equality (Staff)</u> 67% Women 33% BAME 50% LGBTQ+ 50% Disability
Signed: 	Andrew Waite Chief Executive	Date:	31-8-26