**Diversity, Equity and Inclusion (DE&I) Policy**

**Statement of policy and purpose of the policy**

[Insert your organisation’s name] does not discriminate on the basis of race, colour or nationality, ethnic or national origins, sex, gender reassignment, sexual orientation, marital or civil partner status, pregnancy or maternity, disability, religion or belief, age, or any other ground on which it is or becomes unlawful to discriminate under the laws of England and Wales (referred to as **Protected Characteristics**).

[Insert your organisation’s name] is committed to encouraging DE&I among our workforce and eliminating unlawful discrimination. The aim is for our employees to be truly representative of all sections of society and our customers and for each employee to feel respected and able to give their best.

In line with the Financial Conduct Authority’s (FCA) guidance, [Insert your organisation’s name] recognises that we need to be able to identify and respond to the diverse needs of our customers and potential customers. We believe that increased diversity and inclusion will support this.

We intend to enable all our employees to work in an environment that allows them to fulfil their potential without fear of discrimination, harassment, or victimisation. [Insert your organisation’s name]’s commitment to DE&I extends to all aspects of the working relationship, including:

* recruitment and selection procedures;
* terms of employment, including pay, conditions, and benefits;
* training, appraisals, career development and promotion;
* work practices, conduct issues, allocation of tasks, discipline, and grievances;
* work-related social events; and
* termination of employment and matters after termination, including references.

This policy is intended to help [Insert your organisation’s name] achieve its diversity and anti-discrimination aims by clarifying the responsibilities and duties of all employees in respect of DE&I.

The principle of non-discrimination also applies to how employees treat visitors, clients, customers, suppliers, and former employees.

This is a policy statement and does not form part of your contract of employment. This policy may be amended at any time by [Insert your organisation’s name], at its absolute discretion.

**Employment Law**

This document has been reviewed for compatibility with the General Data Protection Regulation laws (“GDPR”).

Under the Equality Act 2010, employers may utilise positive action in recruitment and promotion. ‘Positive action’ means the steps that an employer can take to encourage people from groups with different needs or a past record of disadvantage or low participation to apply for jobs. However, employers are permitted, not required, to take positive action. One of the conditions of the positive action provisions is that employers must not routinely treat people with a protected characteristic more favourably: it must be used only in tie-break situations.

**Who is responsible for DE&I?**

[Insert Name and Job Title] has overall responsibility for this policy and discrimination law compliance in the workplace and has been appointed as the person with day-to-day operational responsibility for these matters.

All employees have a personal responsibility to ensure compliance with this policy, treat colleagues with dignity at all times, and not discriminate against or harass other employees, visitors, clients, customers, suppliers, and former employees. In addition, employees who participate in management, recruitment, selection, promotion, training, and other career development (referred to as Managers) have special responsibility for leading by example and ensuring compliance.

**[Remove if training is not currently provided]**

Managers will receive the appropriate training in DE&I and must take all necessary steps to:

* promote the objective of DE&I and the values set out in this policy;
* ensure that their own behaviour and those of the employees they manage complies in full with this policy;
* ensure that any complaints of discrimination, victimisation, or harassment (including against themselves) are dealt with appropriately and are not suppressed or disregarded.

**What to do if you encounter discrimination**

If you believe that you have been the victim of discrimination, you should follow the [Insert your organisation’s name] Grievance Procedure.

Every employee has a responsibility to combat discrimination if they encounter it. Employees who observe or are aware of acts that they believe amount to discrimination directed at others are encouraged to report these to [Insert Name and Job Title].

Any grievance or report raised about discrimination will be kept confidential so far as is practicable. However, we may ask employees if they wish their complaint(s) to be put to the alleged discriminator if disciplinary action appears to be appropriate.

Employees who raise a complaint about or report discrimination in good faith will be protected from retaliation or victimisation. As long they act in good faith, the fact that they have raised a complaint or report will not affect their position within [Insert your organisation’s name], even if the complaint is not upheld. However, making a false allegation deliberately and in bad faith is a misconduct offence and will be dealt with in accordance with our disciplinary policy. Any employees who attempt acts of retaliation or victimisation may be subject to disciplinary action, including summary dismissal for gross misconduct.

**Non-compliance with non-discrimination rules**

Any breach of non-discrimination rules or failure to comply with this policy will be taken very seriously and will likely result in disciplinary action against the offender, including immediate dismissal.

Employees should also note that:

* in some cases, they may be personally liable for their acts of discrimination, and legal action may be taken against them directly by the victim of any discrimination; and
* it may be a criminal offence intentionally to harass another employee

**Review of this policy**

[Insert Name and Job Title] will keep this policy under review.

[Insert your organisation’s name] encourages employees to comment on this policy and suggest ways in which it might be improved or ask any questions if they are unsure about any part of this policy or how it is applied by contacting [Insert Name and Job Title].