



Equality & Diversity Policy

1. Introduction

- 1.1. Cyngor ar Bopeth Gwynedd Citizens Advice (CAB Gwynedd) is committed to providing a supportive and inclusive culture for:
 - all those who need our services
 - our volunteers
 - our staff and
 - other stakeholders.
- 1.2. We recognise the positive value of diversity, promoting equality and fairness, and challenging discrimination.
- 1.3. We welcome our legal duties not to discriminate as a service provider and an employer. We aim to go beyond the narrow scope of legislative compliance and follow best practice, making equality, diversity and inclusion a fundamental part of all our activities.
- 1.4. We recognise people with different backgrounds, skills, attitudes and experiences bring fresh ideas and perceptions, and we wish to encourage and harness these differences to make our services more relevant and accessible.
- 1.5. CAB Gwynedd will not discriminate or tolerate discriminatory behaviour on the grounds of race, colour, sex, gender identity (transgender), disability, nationality, national or ethnic origin, religion or belief, marital / partnership or family status, caring responsibilities, sexual orientation, age, those identifying as non-binary, social class, educational background, employment status, working pattern, trade union membership or any other factor.

2. Scope

- 2.1. This policy relates to all aspects of the work undertaken by CAB Gwynedd including employment, recruitment and selection of paid staff, meeting clients' needs and service delivery, working with and supporting volunteers, suppliers, supporters and other associated third parties.

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FOR ADVICE CALL

Llywydd / President: Betty Williams
Swyddfa Gofrestredig / Registered Office: Canolfan Lafan, 2 Glanrafon, Bangor, Gwynedd LL57 1LH
Canolfannau Cyngori Bangor, Caernarfon, Dolgellau, Pwllheli Advice Centres

Elusen Gofrestredig (1092359) a Chwmni wedi ei Gyfyngu trwy Warant (04353734); Registered
Charity (1092359) and Company Limited by Guarantee (04353734) Llywydd/President: Betty Williams
Awdurdodir a rheoleiddir gan yr Awdurdod Ymddygiad Ariannol FRN: 617619
Authorised and regulated by Financial Conduct Authority

3. Legal obligations

- 3.1. In valuing diversity, CAB Gwynedd is committed to going beyond the legal minimum regarding equality. Volunteers do not fall within the scope of the legislation listed below. However it does illustrate the framework within which we operate. We are committed to providing our services in a way which is non-discriminatory and which values diversity whether those services are delivered by paid staff, volunteers or a combination of the two.
- 3.2. The Equality Act 2010 harmonises and strengthens and replaces most previous equality legislation. The following legislation is still relevant:
 - The Human Rights Act 1998.
 - The Work and Families Act 2006.
 - Employment Equal Treatment Framework Directive 2000 (as amended).
- 3.3. The Gender Recognition Act 2004 gives people who have changed their gender from the one they were assigned at birth, full recognition in their acquired sex in law for all purposes. A person's transgender status cannot lawfully be disclosed by somebody who has acquired the information in an official capacity, except in specific circumstances which are set out in s22(4) of this Act and the Gender Recognition (Disclosure of Information) No. 2 Order 2005. The allowed circumstances include for the purposes of receiving legal advice and where needed to support credit references, insolvency and bankruptcy proceedings – but do not allow onward disclosure to third parties without justification.
- 3.4. When carrying out monitoring in accordance with this policy, we will comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. In particular, as data controller (and the employer in relation to paid staff) we will take into account the sensitivity and risk to individuals in respect of the use of their personal data and special category data. In light of the potential risks to individuals, we will consider in detail how we use diversity data, such as transgender status, in compliance with the GDPR and we will ensure that appropriate security controls are in place.

4. Meeting clients' needs

- 4.1. We are committed to treating all clients equally and fairly and to not discriminating unlawfully against them. We will also, wherever possible, take steps to promote equality of opportunity. We will ensure that clients:
 - won't struggle to get help from us
 - will have help to find a way forward, whatever their problem
 - are treated fairly, with dignity and respect, and without discrimination
 - will get the level of support they need
 - know that we'll speak up for them

- 4.2. CAB Gwynedd is committed to meeting the diverse needs of clients. We routinely ensure that clients can choose whether to communicate in Welsh or English according to their preference. But we recognise the need to go further to identify the needs of clients in our community and develop policies and procedures accordingly.
- 4.3. We aim to ensure that the services we provide are accessible to all. We will take into account, in particular, the needs of disabled clients (including mental health problems) and clients who are unable to communicate effectively in English or Welsh, including those who are Deaf, who use BSL and who are hard of hearing. We will consider whether particular groups are predominant within our client base and devise appropriate policies / procedures to meet their needs. Such groups include: men and women; those who identify as non-binary or who do not identify to binary genders, carers; older people; members of religious groups; ethnic groups or nationalities and lesbian, gay, bisexual, pansexual and transgender people.

5. Employment (paid staff)

- 5.1. As an employer, CAB Gwynedd will treat all employees and job applicants equally and fairly and not unlawfully discriminate against them. This will, for example, include arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotions and transfers, grievance and disciplinary processes, selections for redundancy, references and any other employment related activities.

Recruitment and selection

- 5.2. We recognise the benefits of having a diverse workforce and will take steps to ensure that:
 - we endeavour to recruit from the widest pool of qualified candidates practicable
 - employment opportunities are open and accessible to all on the basis of their individual qualities and personal merit
 - where appropriate, positive action measures are taken to attract applicants from all sections of society and especially from those underrepresented in the workforce
 - selection criteria and processes do not unlawfully discriminate
 - where appropriate and necessary lawful exemption (genuine occupational requirements) will be used to recruit suitable staff to meet the special needs of particular groups
 - any third parties acting for CAB Gwynedd in respect of employment are made aware of the requirements not to discriminate and to act accordingly.

Training and development

- 5.3. We will ensure that all employees are encouraged to achieve their full potential. Selection for all training and career development opportunities will be purely on the basis of merit. Appraisals of performance will be conducted objectively and on time.

Meeting individual needs

- 5.4. CAB Gwynedd will do its utmost to meet the needs of individuals at work, for example:
- Recognising caring and domestic responsibilities.
 - Working patterns - wherever possible training courses and meetings will be planned to allow attendance by staff working non-standard hours / working patterns.
 - Disability – reasonable adjustments will be made where necessary to remove barriers and enable disabled staff to carry out their roles.
 - Religious practices – time off and suitable facilities for prayer will be provided wherever possible. Requests for annual leave to celebrate religious festivals will be accommodated wherever possible.

6. Volunteers

- 6.1. Volunteers contribute significantly to the diversity of the organisation. They can expect to be treated fairly, with dignity and respect, and without discrimination. They are likewise expected to treat others fairly, with dignity and respect, and without discrimination. Due to the restrictions imposed by employment law, volunteers are not entitled to the same rights and protections as employees.

7. Implementing the policy

- 7.1. The Chief Executive (Tal Michael) is responsible for implementing this equality and diversity policy supported by the management team (George Williams and Michelle Williams).
- 7.2. The policy will be provided to all paid staff, volunteers and trustees and to new starters as part of their induction. All are expected to have read and understood this policy, to ensure they behave in accordance with its principles and requirements, to encourage the same level of behaviour in colleagues and to immediately report any breaches witnessed, whenever it is reasonable for them to do so.
- 7.3. Those who manage staff and supervise volunteers are responsible for promoting this policy and ensuring it is understood and complied with by everyone they work with, dealing with breaches and complaints (whether reported or not) seriously, speedily, sensitively and confidentially and contributing ideas for the advancement of diversity principles within the organisation. They are expected to be proactive in identifying circumstances in which elements of the policy can benefit individuals and encourage and support them in making use of such benefits.

8. Conduct and general standards of behaviour

- 8.1. All staff and volunteers are expected to conduct themselves in a professional and considerate manner at all times. CAB Gwynedd will not tolerate behaviour such as:
- making threats
 - physical violence
 - shouting
 - swearing at others
 - persistent rudeness
 - isolating, ignoring or refusing to work with certain people
 - telling offensive jokes or name calling
 - displaying offensive material such as pornography or sexist / racist cartoons, or the distribution of such material via email / text message or any other format.
 - any other forms of harassment or victimisation.
- 8.2. CAB Gwynedd encourages the resolution of misunderstandings and problems informally where appropriate, but it is important for someone who may have caused offence to understand that it is no defence to say that they did not intend to do so, or to blame individuals for being over sensitive. It is the impact of the behaviour, rather than the intent, that counts, and that should shape the solution found both to the immediate problem and to take steps to prevent further similar problems in the future.
- 8.3. It is therefore essential that all concerned understand that the unacceptable behaviours listed above are considered to be disciplinary offences within CAB Gwynedd and can lead to disciplinary action being taken against paid staff or for volunteers to be removed from their duties.
- 8.4. For more details about performance, disciplinary and grievance matters refer to [our policies](#).

9. Complaints of discrimination

- 9.1. CAB Gwynedd will treat seriously all complaints of discrimination whether made by employees, volunteers, clients or other third parties and will take action where appropriate.
- 9.2. All complaints will be investigated in accordance with the organisation's grievance, complaints or disciplinary procedure as appropriate. The complainant will be informed of the outcome in line with these procedures.
- 9.3. We will also monitor the number and outcomes of complaints of discrimination made by staff, volunteers, clients and other third parties.

10. Monitoring

- 10.1. CAB Gwynedd will monitor and record diversity information about staff and volunteers, including trustees, on the basis of age, gender, ethnicity and disability.
- 10.2. Where it is possible to do so, and where doing so will not cause offence or discomfort to those whom it is intended to protect, we will monitor the sexual orientation and religion or belief of staff and volunteers to ensure that they are not being discriminated against in terms of the opportunities or benefits available to them.
- 10.3. We will regard diversity monitoring data as being confidential and appropriately restrict access to this information. Diversity monitoring data will be used exclusively for the purposes of diversity monitoring and will have no bearing on opportunities or benefits. [Further information on the Citizens Advice network's approach to diversity monitoring.](#)

11. Review

- 11.1. The Trustee Board will have oversight of this policy and will receive regular reports and monitor the effectiveness of this policy at regular intervals in accordance with the requirements of the Leadership Self Assessment, in particular the Equality Standard. Where under-representation of particular groups is identified, the Board will consider appropriate remedial action such as the setting of targets and/or positive action measures provided for in the Equality Act 2010. The Trustee Board should undertake annual reviews of this policy, particularly where there are changes in legislation or significant developments in the area of equality, diversity, inclusion or Human Rights.

This version approved by Trustee Board 17 June 2020