



**Landau Ltd**  
Registered Charity No. 1048645

# Equality & Diversity Strategy & Policy

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Date: Mar 11, 2024

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## **Diversity & Inclusion statement**

Individuals with different cultures, perspectives and experiences are at the heart of the way Landau works.

We want to recruit, develop and retain the most talented people, regardless of their background and make best use of their talents.

At Landau we are guided by our values in everything we do, and recognise that being a diverse and inclusive employer helps us fulfil our responsibility to make a difference for our service users.

We seek to develop a work environment where we treat all employees as individuals, fairly and in a consistent way. We work within the spirit and the practice of the Equality Act 2010 by promoting a culture of respect and dignity and actively challenging discrimination, should it ever arise. We will remove unnecessary barriers for our employees seeking opportunities through training and development, promotion and career planning.

We will continue to support our leaders, managers and employees to demonstrate the principles of diversity and inclusion in their everyday activities, roles and functions.

**Sonia Roberts**

**CEO**

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## Introduction

The Equality Act 2010 states that all public bodies and those carrying out public

functions have a statutory duty to ensure that equality is promoted and discrimination challenged.

Landau operates across a wide geographical area and is committed to ensuring we understand who our customers are, what their needs are and that our services are delivered in a flexible and diverse way, taking into consideration the needs of all customers. We are equally committed to ensuring equality of our staff and key stakeholders.

The strategy and associated action plan, sets out how we will encourage, value and deliver diversity as an employer and service provider in line with government legislative and the Regulatory Standards. It is also aligned to our business strategy.

### **Our Values that are particularly relevant to this strategy.**

Relevant Business Objectives:

<b>Exceptional Workforce</b>	Employees will be highly trained, motivated and competent to do their job
<b>Quality Services</b>	To enhance the company's ability to consistently meet our customer's needs, by providing quality services first time, on time, every time
<b>Customer Satisfaction</b>	Become provider of choice by exceeding expectations

We will ensure our policies, procedures and working practices, for both employment and service delivery, reflect our commitment to achieving equality of opportunity. They will support our commitment to remove all direct and indirect discrimination, and eradicate any harassment or victimisation. We will not tolerate anti-social behaviour, including harassment, hate crime or domestic violence towards our customers or staff.

In addition to fulfilling our statutory responsibility to promote equality of opportunity in all our activities, we are committed to developing an organisational culture which values people from all sections of the community and the contribution each individual can make to our work.

### **Strategic Aims**

- To make a commitment to E&D, supported by a clear action plan
- To provide high quality services that are accessible to all and continuously improving to meet the changing needs of our customers
- To encourage and facilitate involvement from our customers in shaping the delivery of high quality and accessible services
- To gather and securely hold E&D-related data on our customers and employees, and use this to identify areas for future service improvement

- To recruit, develop and retain a diverse, talented and motivated workforce that reflects the communities we work with
- To embed a culture of equality within Landau

## **Delivery**

Delivery of the strategy will be devolved through these key principles through the action plan

- a) To work towards ensuring we have a workforce that reflects the diversity of our service users
- b) Embed equality into the heart of business planning and day to day operations
- c) Ensure that Landau's diverse communities, particularly the most disadvantaged people, benefit from Landau's vision to deliver employment and training opportunities for all.
- d) Support the development of diverse markets, workforces and suppliers, in particular through working with key employers, businesses, voluntary and community sector and skills providers
- e) Provide leadership as an employer and service provider to drive our work to reduce inequalities across our regions
- f) Have a governance structure that holds the organisation to account, ensuring that benefits are achieved from mainstreaming equalities across all of our work
- g) Utilise our evidence base and ensure equality is built into data collection, analysis and reporting of trends to inform our work
- h) Monitor, review and revise equality measures and objectives to analyse the impact of our work on businesses, communities and our workforce
- i) Comply with equalities legislation and paying due regard to the public sector equality duty as a requirement of public sector and EU funding
- j) Set a broad range of targets to ensure that we are meeting the needs of diverse communities and achieving a broadly representative workforce
- k) Ensure all have equal access to opportunities offered by Landau in order to have a diverse supplier market that supports and works in partnership to meet our strategic objectives

## **Commitment**

Every employee is entitled to a working environment that promotes dignity, equality and respect for all. Landau will not tolerate any acts of unlawful or unfair discrimination (including harassment) committed against an employee, contractor, job applicant, visitor, client or participant because of a protected characteristic:

- sex;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race (including ethnic origin, colour, nationality and national origin);
- disability;
- sexual orientation;
- religion and or belief; and

- Age.

All employees will be encouraged to develop their skills and fulfil their potential and to take advantage of training, development and progression opportunities.

Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability.

No form of intimidation, bullying or harassment will be tolerated. If you believe that you may have suffered discrimination because of any of the above protected characteristics, you should consider the appropriateness and feasibility of attempted informal resolution by discussion in the first instance with your line manager or another colleague in a relevant position of seniority. You may decide in the alternative to raise the matter through the Harassment Policy or Grievance Policy. Please see the forms of discrimination below.

## **Types of discrimination**

There are various types of discrimination prohibited by this policy. The main types are:

### **1. Direct discrimination**

Direct discrimination occurs where one person is treated less favourably than another because of a protected characteristic set out in this policy. By way of example, refusing to promote a pregnant employee on the basis that she is shortly due to go on maternity leave would be direct discrimination on the protected characteristic of the employee's sex.

Other types of direct discrimination are:

- Associative discrimination - this is direct discrimination against someone because they associate with another person who possesses a protected characteristic. For example, an employee is discriminated against because his/her son is disabled.
- Perceptive discrimination - this is direct discrimination against an individual because others think they possess a particular protected characteristic. For example, where co-workers believe the individual is gay. It applies even if the person does not actually possess that characteristic.

### **2. Indirect discrimination**

Indirect discrimination occurs when an unjustifiable requirement or condition is applied, which appears to be the same for all, but which has a disproportionate, adverse effect on one group of people. This is discrimination even though there was no intention to discriminate. For example, a requirement for UK based qualifications could disadvantage applicants who have obtained their qualifications outside of the UK; this could amount to indirect discrimination on the grounds of race.

### **3. Victimisation**

Victimisation is where an employee is treated less favourably than others because they have asserted legal rights against Monitor or assisted a colleague in doing so. For example, victimisation may occur where an employee has raised a genuine grievance

against Monitor and is demoted as a result.

#### **4. Harassment**

Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.” It is important to remember that it is not the intention of the harasser but how the recipient perceives their behaviour, which determines whether harassment has occurred. Please see Monitor's Harassment Policy, for further details of how Monitor will deal with bullying and harassment.

#### **Recruitment and selection**

We aim to ensure that no job applicant receives less favourable treatment as a result of any of the protected characteristics listed above. Our recruitment procedures are reviewed annually in line with our recruitment policy to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are essential for the effective performance of the job and therefore justified on non-discriminatory grounds.

We take steps to ensure that knowledge of vacancies reaches a wide market and, where relevant, groups underrepresented in our organisation. Where appropriate, we may be made of lawful exemptions to recruit suitably qualified people to cater for the special needs of particular groups.

Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with Human Resources approval. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments);
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment;
- Positive action to recruit disabled persons;

**Equal opportunities monitoring** (This will not form part of the decision-making process).

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation and the right to work in the UK.

#### **Staff training and promotion and conditions of service**

Staff training needs will be identified through regular staff appraisals. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

The composition and movement of staff at different levels will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to

provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or underrepresented groups.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

### **Termination of employment**

We will monitor redundancy criteria and procedures to ensure that they are fair and objective and are not directly or indirectly discriminatory. We have an Employment Support package in place with a reputable legal firm who advise on all HR and Employment related matters and who conduct an annual check to ensure we are compliant in law and good practice.

We will also ensure that disciplinary procedures are carried out fairly and uniformly for all staff, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

### **Disability discrimination**

If you are disabled, or become disabled in the course of your employment with us, you are encouraged to tell us about your condition. This is to enable us to support you as much as possible.

You may also wish to advise the Company of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties.

The Company may wish to consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job.

Nevertheless, there may be circumstances where it will not be reasonable for us to accommodate suggested adjustments and we will ensure that we provide you with information as to the basis of our decision not to make any adjustments.

We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff.

Where possible and proportionate, we will take steps to improve access for disabled staff and service users.

### **Fixed-term employees and agency workers**

We monitor our use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities.

We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

### **Part-time workers**

We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt



with appropriately.

## **Actions to Implement Landau's Equality and Diversity strategy**

In supporting the mission and strategy above Landau will do the following: -

### **For clients**

- Identify and address clients' individual needs
- Ensure no service user is treated less favorably in relation to any of the protected characteristics
- All the premises we use to deliver services (including those not under our control) to be assessed and upgraded where possible for ease of access.
- Positive action to reach out to the disadvantaged where the need is identified.
- Publish this strategy in suitable formats and make our commitment clear.
- Publicly report on the outcomes of monitoring.
- Actions taken to address specific needs such as adaptive software, a change of format, adaptive technology, simplified language etc.
- The ongoing process of updating and extending our knowledge about equality and diversity on a regular basis.
- All publicity, marketing and information to be kept under constant review to ensure that they carry positive and non-discriminatory messages that promote equality and diversity.
- To see evidence of advocacy being used by our staff in helping young people and adults overcome barriers to progress.
- Working with partners to agree joint action that promotes equality and diversity in education, training and employment.

### **For staff**

- Ensuring no employee or job applicant is treated less favorably because of protected characteristics, conditions or requirements which cannot be justified.
- Using published, objective and job-related criteria when making decisions on recruitment, pay, training, progression and termination of employment.
- Supporting or training staff appropriately to help them progress within or outside the organisation.
- Ensuring that managers apportion development opportunities objectively and as fairly as possible.
- All new staff to receive training during induction on the company policy and plans, and this to be reinforced and updated periodically.
- All staff to understand equal opportunities legislation, relevant case law and best practice as it affects their own job; and to receive training towards this.
- All personnel policies and procedures to be kept under review so as to ensure they are fair and are based on best practice principles.

### **For clients and staff**

- Ensuring as far as possible they have access to the full range of Landau services.
- Consulting clients and staff with learning difficulties and/or disabilities about reasonable adjustments to Landau arrangements and premises so as to minimise any

disadvantages they may face.

- Setting an equal opportunities budget that is flexible but based on identified needs.
- Providing counselling and advice for alleged victims of harassment and abuse.
- Complying with all relevant legislation.
- All policies and procedures to include, where relevant, positive action to identify and challenge discrimination and stereotyping.
- Comprehensive data to be collected about company performance on equal opportunities issues, action taken and these to be made publicly available especially to Members of the Council of Management and staff
- To work towards a client group that reflects our local communities.
- Researching and responding to the needs (in respect of the services we provide) of communities and clients likely to experience discrimination.
- Identify particular groups who need, but do not use our services and implement strategies to make our services more accessible.
- To work towards a workforce that reflects our local communities.
- Obtaining statistical information on the profile of Landau in relation to gender, age, disability and ethnic origin – also of the local population from which Landau normally recruits staff.
- Positive action to be taken where necessary so that the diversity of the community is reflected in staffing levels.
- Monitoring job applications, appointments, training and promotion, highlighting any disparities or trends and addressing these appropriately.
- Ensuring that staff involved in interviewing, are trained in equal opportunities issues in recruitment.
- Identifying possible barriers to employment in the local area and looking at how they could be overcome.
- To work together with partners in the promotion of equality of opportunity.
- Co-ordinate business planning, policy development and professional services with other partners in order to promote equality of opportunity.
- To monitor and evaluate this equal opportunity policy and keep it under regular review.
- Monitoring data on ethnicity, gender and disability in relation to client use of our services as well as outcomes.
- Monitoring job descriptions, appointments, training and promotion, highlighting any disparities or trends in the staff profile.
- Setting annual targets for improvement which are clear, measurable and achievable, monitoring these regularly and reporting on outcomes.
- Conducting annual self-assessment exercises to establish progress in equal opportunities provision.
- Monitoring awareness of the equal opportunities policy by staff through appropriate means.
- Keep abreast of best practice and new legislation.

## **Responsibilities**

It is unlawful to discriminate under the 9 characteristics

However, responsibilities go beyond mere compliance with legislation. Landau has an obligation to promote equality of opportunity and equity of treatment in all aspects of our work. This means understanding, recognising and challenging discrimination in all its forms.

The specific responsibilities of members of staff and beneficiaries are as follows:

#### **CEO**

- To take overall responsibility for the strategic planning and ensuring that business planning addresses equal opportunities issues.
- To ensure that facilities and resources are available.
- To ensure policy is developed, reviewed and implemented.
- To promote good practice in equal opportunities across the company and to partners.

#### **Senior Management Team**

- To take equal responsibility for the development, implementation and review of this Equality and Diversity strategy.
- To ensure that good practice is embedded in all aspects of our activity.

#### **All Managers**

- To raise staff awareness of equality and diversity issues and of procedures to adopt.
- In the case of any perceived discrimination or unequal opportunity.
- To review with staff their practice, performance and training needs.
- To ensure that staff undertake training that is required for the post.

#### **All Staff**

- To represent their teams views and ideas and promote awareness
- To contribute to Self-Assessment on equal opportunities issues.
- To coin tribute to the identification and dissemination of good practice.
- To comply with legislation, the provisions of this policy and to work within the code of practice.
- To promote equality of opportunity in their dealings with service users, stakeholders, partners, contractors, and other staff.
- To maintain awareness of best practice and constantly strive to work within it.
- To participate in any training that is identified as mandatory for their particular post.

#### **Service Users**

- Not to discriminate against or harass any member of staff, in relation to their race, gender or disability.
- To treat other service users with respect, with no discrimination or harassment.
- To report incidents or discrimination or harassment that occur in relation to services the company delivers.

#### **Monitoring & Review**

The Board of trustees and the CEO has overall responsibility for the strategy, the day to day monitoring of E&D is the responsibility of the senior management team to

ensure the action plan is implemented.

We will continue to review the effectiveness of the policy to ensure it is achieving its objectives by monitoring the composition of job applicants and the benefits and career progression of our staff.

Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities.

All members of staff are responsible for the success of this policy and must ensure that they familiarise themselves with the policy and act in accordance with its aims and objectives.

We will produce an annual E&D Report for the board, showing how the action plan is progressing and detailing the outcomes achieved, which aids the review of this strategy.

If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Dignity at Work Policy.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure.

Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any member of staff who is found to have committed acts of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We always take a strict approach to serious breaches of this policy.

## **Delivery plan**

To ensure the delivery, monitoring and review of this strategy, there is an associated Action Plan which can be found within Appendix 1. This details the actions, timescales and responsible officers concerned; as above, the actions are monitored and reported to the Board annually.

## **Equality Analysis**

Equality Analysis will become an embedded feature of policy development and strategic/operational reviews of our services. It ensures that decisions made about our services and/or developments have included consideration of all the diversity issues of those they may affect. This includes evaluation of barriers that may exist or which could have a positive/negative impact on any individual or group. If any adverse

impacts are found to exist, an action plan will be produced to reduce them.

We have delivered training to senior management to ensure their understanding of equality and diversity and the impact this has. To ensure that they are embedded in all our future procedures and reviews, we will ensure that all new services, and appropriate policies and procedures have Equality analyses carried out.

### **Complaints under the Equality and Diversity Policy**

Any complaints concerning harassment or bullying should be raised under the Landau Dignity at Work Policy

Other complaints concerning unfair treatment within the scope of this equal opportunities policy should be raised under the company's Grievance policy.

### **References**

Appendix 1 - Action Plan  
Disciplinary Policy  
Grievance policy  
Recruitment Policy  
Dignity at Work Policy