



Laya Healthcare Diversity & Inclusion Policy

This policy sets out how Laya Healthcare will achieve its aims to promote diversity & inclusion as an employer and supplier of services.

It outlines how Diversity & Inclusion will underpin all areas of the organisation's work and service provision, including the communities within which it operates.

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1. Purpose

1.1. Policy Statement

Laya Healthcare recognises that its customers and team members come from diverse backgrounds, with varying experiences and needs. We are committed to ensuring diversity & inclusion is embedded into our day-to-day working practices. Laya Healthcare actively promotes fairness, respect, equality, diversity inclusion and engagement and is committed to continuous improvement.

- 1.2. Through our policies and in our day to day work and fulfilment of our legal responsibilities, Laya healthcare is committed to promoting equality and fairness and combating discrimination. This applies to everyone, regardless of Gender, Civil status, Family status, Sexual orientation, Religion, Age, Disability, Race (includes race, colour, nationality or ethnic or national origins) or Membership of the travelling community.

2. Objectives

- 2.1. In order to effectively implement its commitment to being an equal and diverse organisation, Laya healthcare has identified the following objectives:

- Provide the organisation's leaders with the skills and knowledge to fully embed fairness, respect, equality, diversity, inclusion and engagement into the organisation's culture, strategy and processes.
- Provide diversity & inclusion training to all team members and Board members, which will include content on their responsibilities, relevant legislation and this policy
- Ensure that no customer or potential customer receives less favourable treatment than any other, making adjustments to services where necessary in order to facilitate this.
- Ensure opportunities are accessible to all, introducing reasonable accommodations to facilitate this where required
- Gather data to enable the monitoring of customer and team members satisfaction to identify and address any negative trends by the 9 Grounds of discrimination.
- Continue to promote a culture where our team members and customers are treated fairly and with dignity and respect
- Enforce a zero-tolerance approach in relation to discrimination, bullying, harassment and inappropriate behaviour, thoroughly investigating any reported incidents and taking appropriate actions in line with our policies and procedures.
- Ensure fair treatment for job applicants, which is free from bias
- Make the best possible use of our existing and potential team through effective talent management
- Provide a safe, supportive and welcoming environment where everyone can contribute to their fullest potential
- Challenge discrimination and promote diversity
- Provide training to team members on Laya healthcare's approach to diversity & inclusion, its commitment to zero tolerance in relation to discrimination, bullying, harassment and inappropriate behaviour and the contents of this policy.
- Act as role models to partner organisations and other external stakeholders.
- Undertake Equality Impact Assessments on all policies, processes and procedures in order to ensure that no direct or indirect discrimination exists within these.

3. Scope

- 3.1. This policy applies to the organisation, its Board members team members partners, and to any external stakeholders which are supported by or engage with the organisation.
- 3.2. Diversity & inclusion imposes rights and responsibilities on every members of team members. All team members and the Board of Directors will be informed that a Diversity & inclusion policy is in operation and that they are bound to comply with its requirements. The policy will also be drawn to the attention of external stakeholders, job applicants and customers.
- 3.3. The policy ensures that our statutory equality duties outlined in the Employment Equality Acts 1998–2015 and the Equal Status Acts 2000 are met.
- 3.4. The 9 Grounds are defined as being:
 - Gender
 - Civil status
 - Family status
 - Sexual orientation
 - Religion
 - Age
 - Disability
 - Race (includes race, colour, nationality or ethnic or national origins)
 - Membership of the travelling community.

4. Key Equality & Diversity Concepts

- 4.1. **Diversity** can be defined as the visible and non-visible differences between individuals. These differences can be related to race, ethnicity, religion, age, disability, sexual orientation and gender, as well as the many differences in values, attitudes, beliefs, cultural views, skills, knowledge, education, background, employment, parenthood, marital status, and life experiences of every individual.
- 4.2. **Equal Opportunities** can be defined as ensuring all those involved with or wishing to be involved with the organisation, regardless of their diversity, are provided with opportunity based on their ability or potential to perform the required activity.

- 4.3. **Discrimination** is unequal treatment of an individual because of their membership of a particular class or group, such as sex, race or trade union. It may be direct, for example, refusing to send someone on a training course because they are married or have children. It may be indirect, for example, declaring a post as being suitable only for a full-time members of team members without proper justification (i.e. establishing the need for a full-time members of team members rather than for part-timers or job sharing).
- 4.4. Discrimination may be subtle and unconscious and may not be easy to identify. For example, discrimination sometimes results from general assumptions about the capabilities, characteristics and interests of particular groups or individuals, which are allowed to influence the treatment of team members or job applicants or clients. This includes unconscious bias.
- 4.5. **Harassment or bullying** has the effect of causing undue stress on individuals and of de-motivating them. Harassment or bullying of any kind will not be tolerated and serves to undermine the safe, supportive and welcoming environment which laya healthcare wishes to encourage.

5. **Management and Delivery of this policy**

- 5.1. Fairness, Respect, Equality, Diversity, Inclusion and Engagement are the responsibility of everyone within laya healthcare. Our values Fair, Grounded, Innovative, Caring also supports our Diversity and Inclusion policy.
- 5.2. The Leadership team of Laya healthcare is committed to embedding Diversity & inclusion within the business, ensuring that everything we do and the manner in which it is done, makes reference to and considers the impact upon our equality objectives.
- 5.3. Laya healthcare uses the procurement process to ensure that its partners and external stakeholders operate their businesses with similar equality objectives and delivers its services with the same ethos.
- 5.4. It is the responsibility of Laya healthcare's Managing Director to implement, monitor and evaluate the diversity & inclusion policy in terms of employment practices (selection, recruitment and retention) and service delivery. The Chief Executive is also under a duty to ensure that the Board of Directors is regularly kept updated in terms of the policy's implementation. Additionally, the implications for the Board arising

from the decisions it makes and the policies it introduces must be made clear to the Board.

- 5.5. The Policy Statement (at paragraph 1.1) will be communicated to all team members, visitors, customers and other stakeholders using a variety of methods such as the team members intranet (Pulse+), Communication walls, Via Communication Comms Champs the website, displayed in offices and where appropriate included in publications.
- 5.6. Annual work plans are in place, which specifically address the diversity & inclusion aspects of all areas of work for team members and the Board of Directors; these support the delivery of the objectives contained within this policy.
- 5.7. Our team members will receive appropriate training to ensure they understand their responsibility not to discriminate and to treat everyone with respect and dignity. Team members are expected to be aware of personal prejudices, unconscious bias and stereotypes and avoid labels at all times.
- 5.8. All team members will be made aware of and follow the requirements in the Anti-Bullying and Harassment Policy
- 5.9. Existing processes will be used to review and investigate any complaints in relation to discrimination, harassment or bullying as follows:
 - team members - Disciplinary and Grievance procedures
 - customers (those using our services) - Complaints procedure
- 5.10. It is expected that when team members or Board Members represent Laya healthcare at any time, including through attendance at committees, meetings with external stakeholders and contact with customers, they will ensure that the diversity & inclusion principles and practices outlined in this policy are adhered to.
- 5.11. When representing Laya healthcare on the committees of other agencies, each team members or Board Members will endeavour to ensure that diversity & inclusion principles and practices are adopted by those agencies.
- 5.12. We will use an Equality Impact Assessments framework to regularly review our policies, to minimise the possibility of directly or indirectly discriminating against any group or individual as a result of our working methodologies.

6. Selection, Recruitment and Retention

- 6.1. Laya healthcare aims to promote diversity & inclusion as an employer. It also aims to ensure that no job applicant or team member receives less favourable treatment or is disadvantaged by conditions or requirements that cannot be shown to be justifiable within the context of the policy.
- 6.2. Selection, recruitment, training, promotion and employment practices generally will be subject to regular review to ensure they comply with this policy. In particular, selection and recruitment procedures will be reviewed annually in order to constantly improve diversity & inclusion practices and respond to changes in legislation. Laya healthcare will monitor data on all applicants as well as those that are successful in order to identify any practices that unintentionally discriminate against specific groups.
- 6.3. We will take whatever positive action is required where it can be shown that under-representation of any particular group has occurred in recruitment. Where appropriate and legally permissible team members from under-represented groups will be given training and encouragement in order to promote diversity & inclusion within laya healthcare.
- 6.4. Team members involved in the selection and recruitment process, and in the management of team members, will receive appropriate training to ensure they recognise when they are making stereotypical assumptions or judgements about people, and avoid any discriminatory practices in the way in which they shortlist, recruit or manage team members. This will include unconscious bias training.
- 6.5. We regard discrimination, harassment, abuse, victimisation or bullying of team members, customers or of others in the course of work as disciplinary offences that could be regarded as gross misconduct. Condoning such behaviour could also be treated as a disciplinary offence. We will give appropriate support to people who complain of harassment of themselves or others.
- 6.6. Laya healthcare has considered the working practices it has in place to address inequality, and discrimination and how it promotes fairness for all. Examples of these against each of the protected characteristics are given below but is not a definitive list of all that Laya healthcare does:

- 6.6.1. We recognise that team members have different needs at different stages during their career, both men and women, for example to balance work and caring responsibilities. We will attempt to accommodate team members requests to work flexibly, whether part-time or some other working arrangement, for whatever reason, so long as agreement is consistent with the needs of the organisation. We will also encourage initiatives designed to help team members who wish to return to work after a career break.
- 6.6.2. Our terms and conditions of employment allow for paternity and partner leave in addition to standard maternity leave, in accordance with current legislation. Laya healthcare's existing maternity benefit pays above the standard rate paid which is reflected in how we support our D&I polices. Laya healthcare has a policy in place for compassionate and dependant's leave to deal with domestic emergencies through our family friendly policies.
- 6.6.3. We recognise that organisations are obliged, under the Employment Equality Acts 1998–2015 to make reasonable accommodations to support disabled people and enable them to do their job without unnecessary difficulty. We will make accommodations which are reasonable, whether or not we are obliged to do so by law, and whether or not a disabled applicant or team member is covered by the definition of 'disabled' under the Employment Equality Acts 1998–2015
- 6.6.4. We are committed to ensuring team members do not experience discrimination (or less favourable opportunities/treatment) on the basis of their race, religion or belief by: -
- Allowing time and, if possible, a place for prayers during the working day and at the workplace as appropriate.
 - Considering team members ' dietary requirements in catering for team members, and when providing facilities for team members to eat and store food.
 - Allowing team members of particular faiths to take their holidays for religious festivals and other religious observance.
 - Trying to arrange job interviews or other important work meetings at times when they do not clash with important religious festivals.
 - Not imposing a dress code with which people of a particular religion cannot comply.
- 6.6.5. We will not discriminate on grounds of age in recruitment, promotion, training, or the availability of benefits - such as pension contributions or health insurance.

- 6.6.6. We will not discriminate on the grounds of gender, where an individual is in the process of gender reassignment or where an individual has completed this reassignment.
- 6.6.7. Laya healthcare will not discriminate on the grounds of marriage or civil partnership and will support individual need as required.
- 6.6.8. We will not discriminate on the grounds of an individual's sex or on the grounds of the sexual orientation providing everyone, whether a members of the team in the office or a team member working from home will have the exact same opportunity to achieve their goals.
- 6.7. As part of its talent management strategy, Laya healthcare will operate an annual team member Check In conversation. Training or education development to enhance potential within the existing job, arising out of needs identified through appraisal or from other circumstances, will, where appropriate or possible, be provided. We may, in certain circumstances, allow for paid or unpaid leave for training or educational purposes.
- 6.8. Laya healthcare's retention, reward and progression processes are fair and take account of the social, domestic, cultural and physical obstacles to people progressing. We seek to identify where these exist for individuals and take actions to limit these where necessary.
- 6.9. We undertake review of pay and continually work towards eliminating any unfair pay gaps where these are identified.
- 6.10. All training opportunities will be published widely through Line Managers to all appropriate team members, and not in such a way as to exclude or disproportionately reduce the numbers of applicants from a particular group. In all training opportunities we will pay due regard to the need to eliminate discrimination on the grounds set out in this policy.

7. Service Delivery

- 7.1. We will use a variety of methods to regularly consult with our customers. We will gather their views on existing and planned services, including changes to provision.
- 7.2. We will make public our commitment to combating discriminatory attitudes where these are encountered by publishing this policy widely amongst team members,

partners, recognised trade unions and external stakeholders and in a variety of formats.

8. Procurement

8.1. Laya healthcare is committed to working with a wide range of suppliers and contractors, from local businesses through to large multi-nationals across a wide range of different types of contracts and purchases.

8.2. Diversity & inclusion will be considered during the procurement process and on the award of contracts there will be an expectation that contractors comply with the relevant legislation and principles of this policy.

8.3. The extent will be dependent on the nature of the work and size of the contractor, but examples of compliance requirements may include contractors being required to;

- Provide diversity & inclusion training for all of their team members, or for their team members to attend laya healthcare's diversity & inclusion training
- Carry out diversity & inclusion monitoring of their team members and to take action to deal with any under-representation of particular groups
- Undertake 'reasonable accommodations' when delivering services for customers.

9. Monitoring and Evaluation

9.1. Laya healthcare will systematically evaluate its services and the effectiveness of its diversity & inclusion policy by a variety of means.

9.2. Information gathered through the complaints, grievances, disciplinary or other appropriate processes will be analysed by the 9 Grounds of discrimination where this information is available to identify any particular trends. Where any negative trends are identified, these will be investigated fully, and recommendations made to the Board.

9.3. We will report annually to the Board on the outcomes of monitoring and evaluation activities, including any trends in relation to particular 9 Grounds.

10. Review Cycle

- 10.1. Responsibility for review of this policy sits with Laya healthcare's HR department.
- 10.2. A formal review will be completed 2-yearly.
- 10.3. Additionally, an interim review would be conducted in the following circumstances:
 - A change is made to relevant legislation, including but not limited to the Employment Equality Acts 1998–2015 and the Equal Status Acts 2000
 - The investigation into a negative trend indicates a review of this policy is appropriate
 - An external review of our services identifies the need for a policy review