

Equality, Diversity & Inclusion Policy

December 2025

Introduction

Luton Rising is committed to the principles of equality, diversity and inclusion, and recognises the importance of adhering to these principles at all times. All that we do will reflect our approach to equality, diversity and inclusion in practice.

What is equality?

At its core, equality means fairness: we must ensure that individuals, or groups of individuals, are not treated less favourably because of their protected characteristics. Equality also means equality of opportunity: we must also ensure that those who may be disadvantaged can get the tools they need to access the same, fair opportunities as their peers.

What is diversity?

Diversity is recognising, respecting and celebrating each other's differences. A diverse environment is one that brings people together with a wide range of backgrounds and mindsets, allowing for an empowered culture of creativity and innovation.

What is Inclusion?

Inclusion means creating an environment where everyone feels welcome and valued. An inclusive environment can only be created once we are more aware of our unconscious biases, and have learned how to manage them.

Equality, diversity and inclusion together form a positive approach to recognise that everyone is different and can make and bring their own unique contribution, experience, knowledge and skills to the organisation. Luton Rising promotes dignity and respect for all, and an environment where individual differences and the contributions of all whom we engage with – whether those who work for us, those who work with us or those we work for – are recognised and valued.

Luton Rising will not unlawfully discriminate against any individuals including those with protected characteristics such as 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 in line with the Equality Act 2010.

This policy is written in accordance with all legal requirements, ACAS guidance and best practice.

Overview

We recognise that both the people who work for us – or who we may want to recruit to do so – and those who use our services are individuals with different needs which may impact on their ability to access many services in our community including our own services. In the case of service users this means that we may, therefore, set up and deliver projects that will work expressly with specific groups in order to increase their chances of accessing the services we provide.

We will, however, also work hard to ensure that all individuals who fit the criteria for employment or access to our services truly have the opportunity to access and benefit from what Luton Rising can offer, and this policy sets out how we aim to do this.

Why this policy exists

The **Equality Act 2010** sets out the legislation around equality, including what is required of employers in the UK.

The aim of this policy is to ensure that Luton Rising operates in line with this legislation and that no service user, job applicant, director, employee, secondee or volunteer is unfairly or unlawfully discriminated against in their dealings with Luton Rising.

Scope

This policy applies to all areas of Luton Rising's work and to all staff, by which term we mean all employees (including those employed by Luton Council to work for Luton Rising), volunteers, directors, seconded staff, agency staff, interns, students on work placement and anyone who is subcontracted to undertake specific duties. Wherever this policy refers to staff or employees it includes everyone mentioned here unless specifically stated otherwise.

The principles set out in this policy will also be reflected in all contracts and project plans. We will expect anyone we sub-contract or with whom we work in partnership to work in line with this policy or to demonstrate that they have their own appropriate equality policy and practices in place.

It is a condition of employment that all employees respect and act in accordance with this policy. Failure to do so will result in action being taken, where appropriate, in accordance with Luton Council's disciplinary procedures.

All employees will be required to read this policy on joining the organisation.

Roles and Responsibilities

- **All staff** are responsible for familiarising themselves and acting in accordance with this policy. Employees should inform their manager if they know or suspect that discrimination or harassment is occurring.
- **Managers** will ensure that this policy is communicated to all staff and will provide advice and guidance to staff regarding their conduct along with sources of available support. Managers are required to exercise leadership in this field by encouraging inclusion, discouraging prejudice and modelling appropriate behaviour. They must also take speedy and appropriate action to deal with any breaches of the policy, or behaviour that could lead to a breach of the policy. Any identified breaches of the policy should be dealt with using the Disciplinary or Grievance Resolution policies. Managers are responsible for applying employment practices, policies and procedures fairly and consistently, and for highlighting and addressing any practices which could lead to discrimination.
- **The Shared Services team** will ensure that this policy is implemented and operated in a reasonable and fair manner, provide advice and guidance to individual members of staff and line managers and oversee provision of any letters and documents required.

Zero tolerance

Although treating anyone differently because they have one or more of the protected characteristics is illegal, the Act only specifies two types of discrimination that apply to all of the protected characteristics: direct discrimination and victimisation. Appendix 1 sets out which types of discrimination apply to which protected characteristics. Luton Rising has a zero-tolerance approach to any form of discrimination on the grounds of any of the protected characteristics, whether or not the Act applies the specific form of discrimination to a specific characteristic.

The sole exception to this is where a specific service may require us to recruit candidates of one or other sex in order to safeguard the users or staff of that specific service. Where this is the case the service model for that service will explicitly set out why recruitment for workers in that service will be focused specifically on one sex over another and this will be reflected in the recruitment process.

Monitoring

Luton Rising will maintain records of gender, ethnic origin, age and disability for all employees and for internal and external job applicants.

This information will be collected and stored in line with the Data Protection Act 2018 (GDPR) and will only be used to monitor compliance with the principles of equality, diversity and inclusion. The information will be reported to the Board of Directors as part of the Annual Staff Development Plan.

Where possible, and dependent on the type of service, we will also monitor the following characteristics for the people using our services:

- Age

- Disability
- Ethnicity
- Sex
- Sexual orientation

Related policies and procedures

The following policies and procedures may need to be consulted in conjunction with this policy as applicable:

- Luton Council's Grievance Resolution procedure
- Luton Council's Disciplinary procedure
- Luton Council's Code of Conduct for employees and protocol for Member/officer relations
- Complaints Policy
- Procurement Policy

The person responsible for the implementation of this policy is the Executive Director, Governance. This policy will be reviewed periodically and at any time experience of its use suggests that changes or clarifications are needed.

Where review is necessary due to legislative change this will happen without delay. The policy will additionally be updated according to legislative and good practice changes and changes in internal structures and role responsibilities as and when needed.

Dissemination

This policy will be available to all new staff, volunteers, including directors, agency workers, secondees and students on placement. During induction the policy will be signed off as having been read and understood.

The policy will be made available to current and prospective partners, suppliers and others on request.

Procedures

Behaviours

Luton Rising is committed to achieving an inclusive and diverse workforce and to providing equal opportunity and access for all. In applying this policy we seek to 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.

Our employment practices, policies and procedures are governed by those of our shareholder, Luton Council, and seek to ensure that no employee or potential employee receives less favourable treatment on the grounds of gender, race, colour, ethnic or national origin, sexual orientation, marital status, religion or belief, age, trade union membership, disability, offending background, domestic circumstances, social and employment status, HIV status, gender reassignment, political affiliation or any other personal characteristic.

Luton Rising seeks to actively promote best practice in diversity and inclusion across the organisation, in accordance with the policies adopted by its shareholder, Luton Council, in areas such as pay and benefits, terms and conditions of employment, dealing with grievances and disciplinary issues, dismissal, redundancy, leave for parents, requests for flexible working and selection for employment, promotion, training or other developmental opportunities.

Both employer and employee 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.

Employees must conduct themselves in a manner which is in accordance with Luton Rising's vision, mission, values and business principles.

The Luton Rising Group's Vision is:

Protecting the world we live in and creating a place of opportunity for everyone.

Our Mission is:

Working towards Luton 2040 by delivering enduring total stakeholder return through the intelligent and creative management of assets and opportunities.

We have adopted the **Values** of our shareholder, Luton Council. For us, they particularly mean the following:

Collaborative – we work in productive partnership with those who share our values and ambitions

Ambitious – we set our sights high without forgetting that it's what happens on the ground that matters

Respectful – we run a well-governed and socially conscious business, respecting the rights of others and their opinions

Empowering – we give people the opportunity to define how they make a difference through the work we do together

Supportive – we do not blame others when things go wrong; we put them right together. Trust and encouragement make for success

We run our business in accordance with the following **Principles**, beliefs and behaviours:

Transparency – we openly and honestly engage with the community for the benefit of all

Sustainability – we are passionate about making things better for our people, place and our planet

Innovation – we drive visionary partnerships to improve people's futures

Success – we exceed expectations to deliver value in everything we do

Trust – we have confidence in the integrity of those we deal with and inspire trust in those that deal with us

Respect – we respect our environment, our stewardship responsibility, and our duty to protect and plan for the future

Communication – we communicate our vision, mission and values with belief and passion

Ownership – we accept responsibility for actions and outcomes

Consistency – we are consistent in our dealings with others and in delivering excellent results

Excellence – we deliver services of exceptional quality to give the best stakeholder return possible

Policy into Practice

Luton Rising will:

- Promote our equality and diversity aims with our staff, partners and other stakeholders.
- Ensure that staff are aware of their responsibilities in implementing this policy.
- Offer training for staff to enable them to understand and implement this policy.
- Expect compliance with and commitment to this policy, and take action if any individual is found not to be complying.
- Take appropriate action to deal with discrimination, harassment and victimisation by or against a member of staff.
- Carry out recruitment, selection and promotion in accordance with this policy.
- Ensure that our commitment to equality is plainly communicated in all policies and procedures and clearly evident in our practices.

- Comply with all relevant legislation including the Equality Act 2010.

Recruitment and Employment

We will act within the framework of principles, policies and procedures laid down by our shareholder, Luton Council.

Recruitment

Luton Rising will:

- Operate fair and inclusive recruitment and employment practices to achieve our operational needs, including use of the 2 Tick scheme for disabled applicants.
- Work to achieve equality of opportunity in all areas of employment.
- Seek to recruit and retain a diverse workforce that reflects the diversity of the communities we serve.

Terms and Conditions of Employment

We will not apply unjustifiable requirements in our terms of employment or working practices. Care will be taken to ensure that Luton Rising's policies and procedures do not include elements which will or could unfairly or adversely impact on individuals or certain groups of staff or service users.

Promotion, training and development

Selection for promotion will only be based on ability or demonstrated potential to do the job. All employees will be encouraged to take advantage of available, relevant and suitable training and development opportunities.

Online courses will be available and internal courses provided by Luton Council will be utilised to meet specific training needs in relation to diversity and inclusion, and appropriate training will be provided for all employees involved in selection for recruitment or delivering training.

The responsibilities of the employer and employee for diversity, inclusion and equality will be positively incorporated into employee training at all levels from induction courses to Senior Management workshops.

Working environment

All efforts will be made to make adjustments wherever reasonably practicable for disabled staff, applicants for posts or any staff member making a reasonable request.

Luton Rising aims to have a working environment and culture where everyone feels comfortable and treated with dignity and respect.

Challenging policy, practice and individuals

Luton Rising is committed to respectful forms of challenge and healthy conflict resolution. We actively encourage staff to challenge each other when they are feeling uncomfortable and expect them to do so if they notice that this policy is being breached.

We will provide information so that staff can access appropriate support to deal with equality, diversity and inclusion issues which they cannot resolve themselves.

Our services

Luton Rising will strive to understand the complexity of the community in which we operate: its needs, challenges and aspirations. We are committed to equality of opportunity within the criteria for our services. Where services specifically exclude specific groups of people we will clearly set out the reasons why this is so.

Access to services

We will, wherever possible, make reasonable adjustments to how we deliver services according to individual circumstances. We aim to ensure that no individual or group applying to use our services will be treated less favourably than any other person or group of persons for any reason that cannot be justified.

Access to information and engagement

Where possible – given limited financial resources – information will be made available in suitable formats, such as large print, recorded or translated, where needed to meet the needs of those with whom we engage. We will work proactively with community leaders and representatives to ensure that we engage effectively with all sections of the community including those seldom heard.

Community investment

A significant part of our income is invested in the community through our Community Funding Programme. We will ensure that funding policies are deeply rooted in the principles of equality, diversity and inclusion and that the allocation of funding is monitored for fairness and proportionality. Where necessary, we will, through our awarding body, take action to encourage applications from under-represented sections of the community and to provide support in making those applications as effective as possible.

Procurement: contractors, consultants, agents and partners

Luton Rising is committed to providing equality of opportunity for contractors, consultants and agents, and will apply fair, open and consistent criteria in the selection of contractors and consultants.

We will only seek to work with partners who share our commitment to equality, diversity and inclusion. We will also work with other community organisations where possible to help us understand the issues of relevance to local communities and groups within those communities and ensure that they are fully included in our work in their area.

Further information about procurement is set out in our Procurement Policy.

Complaints

We will ensure that individual employees who believe they have received treatment contrary to the principles of this policy can have their grievances dealt with quickly and confidentially in accordance with the Grievance Resolution procedure or other relevant procedures.

We will ensure that any service user, contractor, volunteer etc. making a complaint due to any incident which occurs contrary to this policy will have such complaints dealt with quickly and confidentially in accordance with the

Complaints policy. **Assessing Impact**

Unlike its shareholder, Luton Council, Luton Rising is not a public authority subject to the Public Sector Equality Duty. Nevertheless, its principles should inform the way we operate as an organisation. These are:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the [Equality] Act [2010].
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Whilst we are not required to prepare equality impact assessments, section 172 of the Companies Act 2006 requires our directors, in making decisions, to promote the success of the company having due regard to, amongst a number of other factors, the impact on the community.

Every report considered by our Board of Directors includes an assessment of how these factors are affected by the decision it is being asked to make. The assessment of the impact on “the community” provides an opportunity for

the report author to reflect, where appropriate, on the implications for equality, diversity and inclusion in the spirit of the Public Sector Equality Duty.

Health Equity

Health equity is defined by the World Health Organisation as **the absence of unfair and avoidable or remediable differences in health among population groups defined socially, economically, demographically or geographically**.

We know that disparities in health outcomes are a particular concern for policy-makers and the community in Luton and we also recognise that the operations of a principal part of our business – London Luton Airport – has the potential for deleterious impacts on health.

In undertaking our business activities, we will consider how Luton Rising can, itself and in partnership with others, contribute the reduction of health inequalities through action on six the policy objectives set out in Sir Michael Marmot's 2010 Report Fair Society, Healthy Lives:

- Give every child the best start in life
- Enable all children, young people and adults to maximise their capabilities and have control over their lives
- Create fair employment and good work for all
- Ensure healthy standard of living for all
- Create and develop healthy and sustainable places and communities
- Strengthen the role and impact of ill-health prevention

Appendix 1 – Protected characteristics and types of discrimination

Protected characteristics

The Equality Act 2010 identifies 9 protected characteristics, i.e.:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

Types of Discrimination

The Act also identifies 7 types of discrimination, i.e.:

- direct discrimination – treating one person less favourably than another person because they **have** a protected characteristic;
- discrimination by association – treating one person less favourably than another because they **associate with** a person who has a protected characteristic;

- **discrimination by perception** – treating someone less favourably than others because those others think that person has a protected characteristic – it applies even if the person does not in fact have the perceived protected characteristic;
- **indirect discrimination** – this can occur if an employer has practices, rules or policies that apply to everyone but that create a disadvantage for people with a protected characteristic – but see the section below for further information on this;
- **harassment** – unwanted conduct specifically related to a 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;
- **harassment by a third party** – when an employee experiences harassment from someone who is not employed by Luton Rising, which may include service users, funders or suppliers; this applies if Luton Rising is aware of the harassment but takes no measures to stop it from happening.
- **victimisation** – when an employee is treated badly because they have made or supported a legitimate complaint or raised a legitimate grievance under the Act.

Legitimate aim

Indirect discrimination may be justified in some cases where the employer can show that it is reasonable and proportionate in achieving the organisation’s aims, although not that simply of cost reduction. The organisation will need to demonstrate that the indirect discrimination cannot be avoided without negatively impacting on its ability to manage its business.

Appendix 2 – Guidance for Managers on dealing with issues around equality, diversity and inclusion

Luton Rising is corporately liable for acts of bullying, harassment or discrimination by its employees but individual managers may also be held personally liable in the event of any legal proceedings being brought.

All Luton Rising managers are expected to encourage and foster an environment for staff that is free from all forms of unlawful discrimination, bullying and harassment, and to lead by example. Managers are expected to ensure that staff in their teams are aware of the behaviours expected from them under this policy. Managers are expected to act swiftly if unacceptable behaviour occurs, and to take a zerotolerance approach to such behaviour.

If a staff member raises a complaint under this policy

- Find a confidential and quiet place to talk.
- Listen carefully and ensure you understand the full facts.
- Consult with the People Manager and, if applicable, your own line-manager, about what to do next – this may include conducting a full investigation into the complaint and/or invoking the Disciplinary Policy and Procedures.
- Ensure that the staff member raising the complaint is fully supported and knows where and how to access additional support if needed, e.g. the confidential employee helpline.
- While the matter is being investigated and as far as possible protect the staff member(s) against whom the complaint has been made and do not share details of the complaint with anyone not directly involved in the investigation.

Reasonable adjustments

Employers have a legal duty to make reasonable adjustments to ensure disabled employees are not at a disadvantage.

Examples of reasonable adjustments are:

- **Making physical changes**, e.g. widening doorways, providing ramps, audio – visual fire alarms, additional lighting etc.

- **Providing extra aids or support**, e.g. specialist equipment (chairs, desks, keyboards), information in alternative formats such as braille or audio, extra training, supervision or assistance.
- **Changing the way things are done**, e.g. adapting policies or rules on parking, flexible working, rest breaks, sick leave etc.