

Polisi Cydraddoldeb, Amrywiaeth a Chynhwysiant

Equality, Diversity and Inclusion Policy

**Gwasanaeth Pobl a Pherfformiad /
People and Performance Service**

Mawrth / March 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd.

Anyone can access **The County Conversation** to share views and ideas about the County or your local area.



Here's the link to our [County Conversation webpage](#)

Here's the link to our [County Conversation Facebook page](#)



Conwy County Borough Council
PO Box 1
Conwy
LL30 9GN



countyconversation@conwy.gov.uk



01492 574000
BT Relay Service Customers with hearing or speech impairments can contact any Council service by dialling **18001** before the number they require.



British Sign Language users can contact Conwy County Borough Council using a Sign Language interpreter, through the InterpretersLive! Service, provided by Sign Solutions – visit www.conwy.gov.uk/Contact-Us/sign



We are happy to provide this document in large print, audio and braille.

Please contact the People and Performance Service

Please Contact: HR and Equality Officer
E-mail: equalities@conwy.gov.uk
Telephone: 01492 576301 / 574213

Approvals	
Approved	Date: January 2023
Equality Impact Assessment Completed	Date: January 2023
Version	V2

Version Control			
Version No.	Key Changes	Agreed By	Issue Date
1.0	Equality and Diversity Policy		2013
2.0	<ul style="list-style-type: none"> • The addition of “Inclusion” into the policy; • Updated Corporate Plan outcomes • Includes details of the Socio-economic Duty • Refers to and explains “intersectionality” • Includes reference to and a description of Unconscious Bias • Refers to and describes the Social Model of Disability • Explanation of the Disability Confident (previously two-tick) scheme • Details of the Equalities Champions Group • Updated Procurement section • Inclusion of a Modern Slavery statement • Strengthened the reference to “Hate Crime” • Updated Useful Terms and Definitions (as a separate Appendix) • Updated Useful Resources document (as a separate Appendix) 	SMT	2023

Equality, Diversity and Inclusion Policy

1. Contents

1. Contents
2. Policy Statement
3. Introduction
4. Aims of the Policy
5. Scope of the Policy
6. Types of Discrimination
7. Social Model of Disability
8. Equality in Service Delivery
9. Equality in Employment
10. Procurement and Working with Others
11. Responsibility and Implementation
12. Making a Complaint of Discrimination
13. Monitor and Measuring Progress
14. Review and Equality Impact Assessment
15. Alternative Formats and Languages

Appendix

Appendix A – Useful Terms and Definitions

Appendix B – Useful Contacts and Resources

2. Policy Statement

Conwy County Borough Council is committed to integrating equality, diversity and inclusion considerations into the day to day activities that are carried out as an employer, service provider and commissioner of services for our diverse community. We are committed to creating a community for all people, who live in, work in and visit Conwy, where difference is valued and harassment and discrimination is not tolerated. We recognise that what we do every day within Conwy plays an important part in people's lives and we have a key role in enhancing the quality of life for everyone in our community.

Fostering an inclusive culture helps each of us to benefit from a wider range of different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all. We believe that a culture of equality, diversity and inclusion not only benefits our organisation but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

Recognising and understanding the needs of communities in Conwy will help us to remain customer focused and provide accessible and high quality services. The Council recognises that the promotion of equality in the workplace is good management practice in which all employees are supported to reach their full potential and the talents and resources of the workplace will be utilised to maximise the efficiency of the Council. By maintaining a diverse and well informed workforce we believe we can better meet the needs of our diverse community.

3. Introduction

What do we mean by equality, diversity and inclusion?

Equality is about recognising and valuing differences and treating people according to their needs. It is about creating a fairer society, in which everyone can take part and have the opportunity to achieve their true potential regardless of their identity.

Diversity is understanding that each person is unique. It means embracing people's differences, including their beliefs, abilities, preferences, backgrounds, values, and identities.

Inclusion is an extension of equality and diversity. It means that all people, without exception, have the right to be included, respected, and appreciated as valuable members of the community.

Equality, diversity and inclusion are about valuing everyone as an individual, treating people fairly and providing equal chances, while respecting people's differences.

Conwy's Vision and Values were developed in consultation with employees, managers and senior managers from across the Council. Equality is specifically identified in the value 'we are fair to all' but it is relevant to all our core values. Our values represent the beliefs and expected behaviour of everyone working for the Council. Our vision is, 'Conwy - a progressive County creating opportunity'.

Our values, which aim to support quality policies, practices and services, are:

- We care about what we do
- We are fair to all
- We are innovative
- We are team players

Our priorities are that:

- 1) People in Conwy value and look after the environment
- 2) People in Conwy live in a county which has a prosperous economy with culture at its heart
- 3) People in Conwy are Educated and Skilled
- 4) People in Conwy have access to affordable, appropriate, good quality accommodation that enhances the quality of their lives
- 5) People in Conwy are safe and feel safe
- 6) People in Conwy are Healthy
- 7) People in Conwy live in a county where the use of Welsh is thriving and people can participate in all aspects of community life through the medium of Welsh
- 8) People in Conwy are informed, included and listened to and can actively contribute to a community where their background and identity are valued and respected
- 9) Conwy County Borough Council is resilient

Across all areas of work we will ensure that we meet the needs of the present without compromising future generations, in line with the Wellbeing of Future Generations (Wales) Act 2015. We will endeavour to make the best decisions we can in light of the financial restraints we face. We will consider the impact of policies and practices on our communities, including those protected under Equalities legislation, people living in socio-economic disadvantage and we will promote and facilitate use of the Welsh language.

Our guiding principles for equality are:

- Celebration of diversity and difference
- Elimination of discrimination and disadvantage
- Inclusiveness and accessibility
- Accountability

Equality, diversity and inclusion are mainstreamed into the daily activities of employees and service users through corporate plans, performance management, engagement

and consultation, assessing the impact of policies and practices and through the Welsh Standards.

This policy accompanies other related policies, plans and guidance adopted by the organisation, such as our:

- Policy Against Harassment at Work
- Policy Against Bullying
- Grievance Policy
- Whistleblowing Policy
- Menopause Guidance
- Strategic Equality Plan
- Equality Action Plans
- Employment Monitoring
- Equality Impact Assessment
- Violence against Women, Domestic Abuse and Sexual Violence Policy
- Mental Health and Wellbeing Policy
- Various Special Leave/Flexible Working Policies
- Recruitment and Selection Policy
- Anti-racist Wales Action Plan
- LGBTQ+ Action Plan

4. Aims of the Policy

This policy supports the Council's service delivery, commissioning of services and employment policy and practices.

The overall aim of this policy is to demonstrate how we will value everyone as an individual, treating people fairly and providing equal chances, while respecting people's differences. It also shows how we meet the objectives of the Public Sector Equality Duty, under the Equality Act 2010, with due regard given to:

- Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
- Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it

It also demonstrates how we will give due regard to the Socio-economic Duty and the need to reduce the inequalities of outcome that result from socio-economic disadvantage. This will encourage better decisions and outcomes for those who are socio-economically disadvantaged.

This Policy is underpinned by the following legislation:

- Equality Act 2010 (including the Socio-economic Duty)
- Statutory Duties (Wales) Regulations 2011
- Welsh Language (Wales) Measure 2011 / Welsh Language Standards 2015

- Well-being of Future Generations (Wales) Act 2015
- Human Rights Act 1998

The Council commits to promoting a zero tolerance approach to racism and all forms of discrimination throughout our work. We are committed to delivering our Strategic Equality Plan, and working alongside Welsh Government and other public sector partners in delivering the [Anti-racist Wales Action Plan](#), the [LGBTQ+ Action Plan](#) and any other equality action plans.

The Council's Strategic Equality Plan sets out the Council's Equality Objectives and action plan to meet the requirements of the Equality Act 2010 and the specific public sector duties as specified by the Statutory Duties (Wales) Regulations 2011.

5. Scope of the Policy

It is the intention of this policy that no individual, including job applicants and employees, receives less favourable treatment than another or is disadvantaged by reason of any protected characteristic as identified in the Equality Act 2010 when using the services, facilities and information provided by or on behalf of the Council.

The Equality Act 2010 outlines the groups or protected characteristics that are protected by legislation. These are:

- Race
- Sex
- Gender Reassignment
- Disability
- Sexual Orientation
- Religion and Belief
- Age
- Marriage and Civil Partnership
- Pregnancy and Maternity

We live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others. The more areas of difference a person brings, the more this effect can be compounded. In this way, the experiences of a disabled black woman may be very different to the experiences of a non-disabled black woman, and also very different from the experiences of a white woman. This way of looking at diversity and inclusion is known as **intersectionality**.

Everyone who uses the services, facilities and information provided by or on behalf of the Council should be treated in line with this policy.

The policy applies to all employees of Conwy with the exception of teachers and those employed by School Governing Bodies. Those employed through or by School Governing Bodies are subject to the relevant policies of that school.

The policy will apply to full-time, part-time, fixed term, temporary, casual and relief employees who are workers/employees of the Council, regardless of the hours worked. Also covered by this policy are people on work experience, volunteers and agency staff.

Service providers to the Council are also required to adhere to this policy, therefore, companies or individuals working alongside workers/employees of the Council are required to follow the principles of this policy.

Members are required to adhere to the principles of this policy. The Member Code of Conduct applies to Elected Members. Section 4 of the Code of Conduct states that Members must:

- a) Carry out duties and responsibilities with due regard to the principle that there should be equality of opportunity for all people, regardless of gender, race, disability, sexual orientation, age or religion.
- b) Show respect and consideration for others
- c) Not use bullying behaviour or harass any person

6. Types of discrimination defined within Equality Legislation

Discrimination occurs when someone is treated less favourably than another person in a similar situation and this treatment cannot be objectively and reasonably justified.

Direct discrimination

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see perceptive discrimination below), or because they associate with someone who has a protected characteristic (see associative discrimination below).

Discrimination by association

This is direct discrimination against someone because of their association with another person who possesses a protected characteristic. This applies to age, race, religion or belief, sexual orientation, disability, gender reassignment and sex.

Perceptive discrimination

This is direct discrimination against an individual because others think (or perceive) they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic. This applies to age, race, religion or belief, sexual orientation, disability, gender reassignment and sex.

Indirect discrimination

Indirect discrimination can occur when a condition, rule, policy or practice in the organisation applies to everyone, but disadvantages people who share a particular protected characteristic, compared with others who do not share that characteristic. Indirect discrimination can be justified if it can be demonstrated that someone acted reasonably in managing the business. In law it is referred to as, 'a proportionate means

of achieving a legitimate aim'. A legitimate aim might be any lawful decision made in running a business or organisation. Being proportionate means being fair and reasonable, including showing that you have looked at 'less discriminatory' alternatives to any decision a person makes.

Harassment

Harassment is "any 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".

Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees may complain of behaviour that they find offensive even if it is not directed at them, and the person making the complaint need not possess the relevant characteristic themselves.

Victimisation

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

Unconscious Bias

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- Steering employees into particular types of work on the basis of stereotypical assumptions, without considering the attributes and abilities of individuals
- Recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients
- Using different standards for different groups of employees to judge performance

Individuals can be held personally and criminally liable for discrimination and harassment.

7. Social Model of Disability

The Council promotes the principles of the Social Model of Disability, which takes the perspective that society creates barriers that "disable" people from participating fully and on an equal basis with others and we are committed to removing these barriers.

The social model of disability puts the focus on the individual and their unique needs and not on their condition. This person-centred approach helps develop positive attitudes in society. The language used in a social model reflects this person-centred approach, for example 'disabled people' rather than 'people with a disability'.

The social model says that people are disabled by barriers in society, not by their impairment or difference. Barriers can be physical, like buildings not having accessible toilets. Or they can be caused by people's attitudes to difference, like assuming disabled people can't do certain things. The social model helps us recognise barriers that make life harder for disabled people. Removing these barriers creates equality and offers disabled people more independence, choice and control.

These barriers tend to be of the following kinds:

- **Environmental:** buildings, transport and other public places and services being developed without thought for the needs of disabled people
- **Attitudinal:** people and communities being quick to draw stereotypical conclusions that limit the potential of disabled people and the tendency of some people (knowingly or unknowingly) to be discriminatory or prejudicial
- **Organisational:** showing lack of flexibility and empathy in the way they develop their policies, practices and procedures
- **Communication:** poorly-worded letters and emails in fonts that make them difficult to read, inaccessible websites, and lack of communication support (including a lack of British Sign Language interpretation)

When barriers are removed, disabled people can be independent and equal in society, with choice and control over their own lives.

8. Equality in Service Delivery

Our aim is to be customer focused in every aspect of our service delivery; providing appropriate, accessible and effective services and facilities to meet the diverse needs of our community. This will include:

- Treating customers and visitors with dignity and respect
- Integrating equality of opportunity and respect for diversity into all aspects of our activities
- Designing and delivering appropriate, accessible and effective services and facilities to meet people's needs including cultural requirements
- Providing clear and accessible information about our services, in a variety of appropriate formats and languages which meet people's needs
- Challenging all forms of unfair discrimination, whether intentional, unintentional, institutional or otherwise, by using the equality impact assessment process to identify any adverse impact in order to remove or reduce it and to promote any positive impact identified
- Using effective systems for challenging, reviewing and monitoring our service delivery and to ensure that quality and equality are continuously evaluated
- Engaging with, consulting and listening to all sections of our community in identifying different needs and in making decisions on the way we plan and deliver our services

- Monitoring and evaluating service up-take in relation to the protected characteristics
- Making it easier for people in Wales to use Welsh as part of their everyday lives by following the Service Delivery Standards as set out in the Council's Welsh Language Policy
- Working with our partners in the statutory, voluntary and private sectors to ensure the best outcomes for people who live in, work in and visit Conwy
- Work within our resources to promote and advocate for schemes which advance equality, diversity and inclusion in service delivery. For example, promoting the Hidden Disabilities Sunflower lanyard scheme (which discretely indicates that the wearer may need additional support, help or a little more time) at our buildings and venues

9. Equality in Employment

The Council is committed to promoting equality of opportunity in employment, promotion and training. We are committed to eliminating discrimination, harassment and unwanted behaviour and encouraging diversity amongst our workforce. Our aim is to maximise the potential of all employees and prospective employees by ensuring that fair employment practices are adopted and regularly reviewed to reflect legislative changes and best practice. We strive to create a workplace in which everyone can give their best and be themselves.

Employees and potential employees can expect the Council to:

- Create an environment in which the individual differences and contributions of our staff are recognised and valued
- Promote a working environment that entitles all employees to dignity and respect
- Review our employment practices and procedures on a regular basis to ensure they reflect legislation, published codes of practice and best practice
- Work within our resources to promote and advocate for schemes which advance equality, diversity and inclusion as an employer. For example, taking relevant actions to maintain certification as a Disability Confident Employer

Policy Commitments:

9.1 Recruitment and Selection

Those employees who have responsibility for the recruitment and selection of staff must undertake appropriate training and ensure that selection procedures are fair and are carried out in accordance with the Council's Recruitment and Selection Policy. We commit that:

- We will take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible

- Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions
- Recruitment to all jobs will be on merit, and selection criteria used will be relevant to the job and will promote equality of opportunity
- We will encourage lawful positive action initiatives where data shows that people from particular groups are under-represented, where appropriate, to help redress employment imbalances
- We will abide by the commitments set out in the Disability Confident Scheme

9.2 Training

Relevant training and development opportunities will be made available to all employees through regular check-in meetings with their line manager under our Conwy Conversation process. We commit to:

- Raise awareness of equality issues at all levels through training, ensuring that no one is in any doubt about what constitutes acceptable and unacceptable conduct
- Monitor and report on access to, and attendance at, training to ensure that all staff have equal access to training and development opportunities
- Endeavour to ensure that all employees have an equal chance to contribute to and achieve their potential

9.3 Employment

This policy extends to all employees and categories of employment and also applies to all aspects of employment, from recruitment to dismissal and includes former worker's rights in respect of reference provision. We commit to:

- Ensure that our organisation is free of unwanted conduct that violates the dignity of individuals and creates an environment where no form of intimidation, bullying, victimisation or harassment will be tolerated
- Seek information from relevant groups through consultation to make informed decisions about employment policies and practices
- Treat all complaints of discrimination or harassment in the course of employment seriously, and where appropriate, deal with them in accordance with our disciplinary procedure, which may result in disciplinary sanctions and even dismissal
- Integrate equality considerations into the decisions we make covering all aspects of employment including recruitment and selection, training, promotion, pay, employee benefits, employee grievances and disciplinary procedures

9.4 Disability Confident Employer Scheme

The Council is committed to providing a safe and informed working environment for disabled employees (and prospective employees) or those who become disabled during their employment. Disabled staff do not have to tell us. However, they are encouraged to let us know so that we can support them, for example by making

reasonable adjustments to our premises or to aspects of their role, or to working practices. If staff are experiencing difficulties at work because of their disability, they are encouraged to contact their line manager to discuss potential reasonable adjustments that may alleviate or minimise such difficulties.

The Council has been certified as a Disability Confident Employer (Level 2), adhering to the Core Actions under the two themes: 'Getting the right people for your businesses' and 'Keeping and developing your people', and we undertake numerous activities to support this:

Theme 1: Getting the right people for your job

Core Actions

- Providing a fully inclusive and accessible recruitment process
- Offering an interview to disabled people who meet the minimum criteria for the job
- Proactively offering and making reasonable adjustments as required
- Encourage our suppliers to be disability confident
- Ensure employees have sufficient disability awareness

Theme 2: Keeping and developing your people

Core Actions

- Promoting a culture of being Disability Confident
- Supporting employees to manage their disabilities or health conditions
- Ensuring there are no barriers to the development and progressions of disabled staff
- Ensuring managers are aware of how they can support staff who are sick or absent from work
- Valuing and listening to feedback from disabled people
- Reviewing the Disability Confident employer self-assessment every 3 years, or earlier as appropriate

Further information about the Disability Confident Employer Scheme can be found [here](#).

9.5 Equality Champions Group

We have Equality Champions in all service areas who meet on a quarterly basis to discuss equality work underway within the organisation. This group is open to other interested parties to attend and provides a forum for people who have a passion for, or a connection with, a particular aspect of equality, diversity and inclusion.

The aim of the group is:

1. For employees with a desire to make a difference to improve the environment for everybody
2. To provide a mechanism for employees to bring to the attention of the group any issues that are of concern which adversely affect different groups

3. To provide a forum to share good practice
4. To provide an opportunity to evaluate progress on equality actions set out in the Council's equality action plan(s)
5. Part of a commitment to ensuring a balanced view is always considered

Staff interested in joining this group should email equalities@conwy.co.uk.

10. Procurement and Working with Others

The Council regularly works in partnership with external organisations to share the responsibility for service delivery. The Council must ensure that money spent on goods, works and services meet the diverse needs of the customers we serve. Our customers deserve a high quality service regardless of who provides the service.

This policy applies to service suppliers, contractors and outside agencies e.g., independent contractors, the voluntary sector and services delivered by joint committees which the Council is involved with.

Where a public function is carried out on behalf of Conwy County Borough Council, the contractor is bound by the public sector general and specific equality duties. It is therefore the responsibility of those services working with these bodies to ensure they are informed of this policy.

The Council remains responsible for meeting the general duty even where relevant works or services are contracted out to an external supplier. It is important that equality considerations are built into procurement processes.

The general duty applies to anyone who is carrying out a public function. Where an external body is being contracted to provide a relevant public service (including, in some cases, providing goods or works) the Council has a duty to make them aware of the responsibilities that may arise under the public sector equality duty and to assist them appropriately. This may involve being clear about the need to address a range of needs and to mitigate disadvantage.

The Council must have due regard at all stages of the procurement process to the need to advance equality, for example:

- Advertising and selecting who to invite to tender
- Drafting the invitation to tender and evaluation criteria
- Drafting contract specifications and conditions
- Monitoring, managing and enforcing contracts

The Council must assess its procurement policies and strategies to consider whether they adequately meet the aims of the duty. Policies and strategies should cover planning and carrying out procurement and the subsequent management and enforcement of contracts.

10.1 Partnerships

To encourage partners to value diversity and promote equality, the Council will:

- Incorporate equality principles in terms of reference to ensure that we embed equality within strategies, plans and projects, including identifying responsibility for equality impact assessments
- Lead by example incorporating the principles of equality in all that we do
- Work together with our partners to embed and mainstream equality within our work

10.2 Modern Slavery

The Council recognises that it has responsibility to take a robust approach to modern slavery and human trafficking and, as an employer, acknowledges its duty to notify suspected victims of slavery or human trafficking as introduced in Section 52 of the Modern Slavery Act 2015. We are committed to preventing slavery and human trafficking in our corporate activities and taking steps to ensure that our Suppliers/Service Providers/Contractors and their supply chains are free from slavery and human trafficking.

11. Responsibility and Implementation

Everyone has a personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share. This may mean allowing for different views and viewpoints and making space for others to contribute.

We expect that everyone who interacts with the Council, as both an employer and a service provider, should be treated with dignity, courtesy and respect. Everyone should be aware of the effect their own behaviour and language has on others and use behaviour and language that is inclusive rather than discriminatory or offensive.

By embedding such values and constructively challenging inappropriate comments or ways of working, we can work together to achieve and maintain a truly inclusive workplace culture.

11.1 Cabinet and Senior Management

The Leader of the Council, Members of the Cabinet, Chief Executive, Strategic Directors, Chief Officers, Senior Managers, Equality Champions and the People and Performance Service are all responsible for promoting both the principle of equality, diversity and inclusion, and the practical action needed to implement this policy. Responsibility for the Council's approach to all equality issues lies ultimately with the Chief Executive. The People and Performance Service has responsibility for co-ordinating equality issues and actions in both service delivery and employment.

The Cabinet, Chief Executive, Strategic Directors, Chief Officers, Senior Managers and Equality Champions will:

- Publicly demonstrate their support by endorsing events that promote the principle of equality

- Ensure that the public image of the Council emphasises its commitment to the principles of equality
- Ensure that resources are allocated as appropriate to implement equal opportunities

11.2 Managers

Managers have a responsibility to promote the principles of equality, diversity and inclusion and to act in accordance with this policy in delivering services and managing their employees. Managers are required to take prompt action to address any inequality, discrimination and harassment in the workplace. In identifying and challenging discriminatory practices and behaviour, managers have an important role to play in leading by example. Managers have a dual responsibility to ensure services are accessible and meet the needs of diverse groups in our community and to comply with equality legislation through all aspects of employment.

Managers will:

- Ensure their employees are aware of the principles set out in this policy
- Respect the confidentiality of all service users and employees and ensure that all equality issues are managed with discretion and sensitivity
- Ensure their employees undertake the mandatory Equalities & Human Rights Awareness training
- Support employees to develop and enable them to reach their full potential through:
 - Full consideration of the need to achieve a healthy work-life balance
 - Ensuring employees attend regular check-in meetings as part of the Conwy Conversation process
 - Abiding by the commitments set out in the Disability Confident Scheme
- Ensure equality impact assessments are undertaken in a timely manner for relevant policy/practice or decisions proposed in their service area as appropriate

11.3 All Employees and Workers

All employees and workers will be made aware of this policy and shall have responsibility to respect and act in accordance with it. All employees, and contractors working on behalf of the Council, are required to treat others with dignity and respect and to not unlawfully or unfairly discriminate on any grounds.

The success of implementing this policy is dependent upon all employees taking responsibility for promoting equality, diversity and inclusion. All employees have a duty to report any practices of discrimination or inequality that they observe. Inappropriate behaviour by employees, either directed towards work colleagues or members of the public will not be tolerated.

Employees will:

- Treat other employees, customers, contractors and visitors to the Council with dignity, courtesy and respect

- Be aware of the effect their own behaviour and language has on others and use behaviour and language that does not cause offence and is not discriminatory
- Be sensitive to the diverse needs and beliefs of colleagues, for example, different arrangements due to reasonable adjustments
- Respect the right of colleagues not to disclose aspects of their protected characteristics if they so wish
- Be aware of the effect of their own behaviour and language outside the workplace and on social media, and the impact this may have on employment if it is likely to bring discredit to the Council

Any breach of this policy will be dealt with through the [Disciplinary Policy](#). Serious offences such as harassment will be treated as gross misconduct. The [Policy Against Harassment at Work](#) details grounds and forms of harassment.

11.4 Trade Unions

All recognised Trade Unions and Trade Union Representatives have a responsibility to promote the principles of equality, diversity and inclusion, and ensure that they act in accordance with this policy, and report any discriminatory practices that they identify during the course of their duties.

The Council is committed to working in partnership with Trade Unions and to incorporating the principles of equality, diversity and inclusion through the work that is undertaken.

11.5 Contractors and Partners

All contractors and partners undertaking activities for the Authority have a responsibility to comply with the requirements of this policy and this will be reflected in all contract and partnership arrangements.

12. Making a Complaint of Discrimination

If an individual experiences discrimination while working with us, or using our services whilst living or working in our communities, we want to know about it, to ensure that this is recorded and an appropriate resolution is sought. The complaint will be taken seriously and we will take action where our policies have been breached.

The Council will not tolerate any contraventions of this Policy, by any of its employees, members, contractors, or other agents working or delivering services on our behalf.

We all have a responsibility to treat others with dignity and respect. This includes the language we use with each other. It is recognised that acceptable language and terminology in relation to the equality agenda changes over time and we all have a duty to ensure that the language we use is appropriate and up to date. We believe that treating everyone we encounter with dignity and respect is not only an essential ingredient in our Council's culture, but is also vital in order to comply with the legislation and to meet our commitments outlined in this Policy.

Discrimination on the grounds of any protected characteristic is regarded as gross misconduct in the Council's Disciplinary Policy. Any form of harassment, bullying or victimisation of colleagues or members of the public, or false or malicious accusations of such conduct, is also deemed to be gross misconduct. Either situation could result in summary dismissal, following a full investigation and disciplinary hearing. Our [Policy Against Harassment at Work](#) describes unacceptable behaviours, and set out procedures and support available to employees.

12.1 Complaints from Employees

Employees who feel they have experienced discrimination or harassment in the workplace from another employee or third party, should in the first instance try to resolve the situation informally themselves by advising the perpetrator that their behaviour is not acceptable to them and requesting that it stops. If the employee does not feel able to approach the perpetrator directly, or they feel the situation is more serious, they may proceed straight to a formal procedure.

If an employee wishes to commence formal procedures, they should contact their line manager, if appropriate, and follow the Council's [Grievance Procedure](#) or the [Policy Against Harassment at Work](#) to ensure that appropriate action is taken to prevent repeat incidents. The employee may also wish to have a confidential discussion with a member of the People and Performance Service and / or a Trade Union Representative.

The Council's [Whistleblowing Policy](#) can also be followed to raise serious concerns within the organisation. Copies of relevant policies are available on the [intranet](#) or upon request from the People and Performance Service.

Employees who require additional support on any work related or personal matter, or feel they could benefit from counselling advice can contact [Care First](#).

12.2 Complaints from the Public

If an individual experiences discrimination or harassment whilst using one of our services then the Council's complaints procedures should be followed.

These are set out in the Conwy Complaints and Compliments leaflet which is available from all local Council Offices, libraries and via the Councils' [website](#), or by contacting the Council by telephone 01492 576070 or email: complaints@conwy.gov.uk.

All complaints will be treated in confidence and investigated fully and any action against an employee found to have contravened the policy will be dealt with using the Council's Disciplinary Policy.

In some cases, incidents could be considered a hate crime. A hate crime is defined as 'any criminal offence which is perceived by the victim, or anybody else, to be motivated by hostility or prejudice towards someone's race, religion, sexual orientation, transgender identity and/or disability'. More information about hate crime can be found at www.hatecrime.campaign.gov.uk.

If an individual has been harassed in the community because of a protected characteristic they can report this to North Wales Police on the numbers below. It is important to ensure that where a hate crime has been committed this is recorded as it helps public organisations to record the extent of such problems in Conwy and take appropriate action.

Report to **North Wales Police** on:
Telephone: 101 (Non-emergency)
TypeTalk: 01978 294738
Minicom: 01745 535612

Or contact **Victim Support** directly to report a Hate Crime:
Website: www.reporthate.victimsupport.org.uk
Telephone: 0300 30 31 982 (free number)
Email: hate.crimewales@victimsupport.org.uk

Or to **Safer Wales**:
Web link: www.saferwales.com
Telephone: 029 2022 0033

Or contact the **Safer Conwy** team:
Website: Safer Conwy
Telephone: 01492 575229
Email: saferconwy@conwy.gov.uk

13. Monitoring and Measuring Progress

The Council will monitor this policy through the following processes:

- Monitoring complaints, compliment and other feedback received regarding recruitment, employment and service delivery and this will be reported on in the annual equality report which is published on our website
- Analysing annual employment monitoring, which is published on our website, and service equality monitoring data
- Using equality monitoring data to inform the Equality Impact Assessment process and to feed into policy reviews
- Information gathered through consultation undertaken by the Council

By collecting equality monitoring data covering various aspects of people's identity we can analyse the data to make informed decisions regarding our policies and practices and this helps us to avoid any adverse impact on different groups. Any patterns of inequality practice found to exist will be investigated and remedial action taken, both to correct the situation and to prevent any re-occurrence.

14. Review and Equality Impact Assessment

This policy will be reviewed jointly with the Trade Unions three years after implementation. Minor amendments will be delegated to the Head of People and Performance, e.g., terminology, title descriptions, legal changes that have to be implemented. The policy will continue to be monitored for any impact on equalities.

15. Alternative Formats and Languages

This Policy is published on our website in Welsh and English.

The Policy can also be accessed on our free public access computers which are in all Council Libraries and Coed Pella Reception.

Copies can be made available in paper copy, Braille, large print, audio CD, British Sign Language and in other languages. To arrange a copy please contact:

Telephone: 01492 574213

Email: equalities@conwy.gov.uk

If you have a hearing or speech impairment you can contact us from your Textphone by dialling 18001 before (or followed by) the number you require. You can also download the free NGT (Next Generation Text) App on your mobile or other device. A BT Operator will act as an intermediary, relaying the call between our officer and yourself. This services incurs no additional cost. British Sign Language users can also contact us using a Sign Language interpreter, through the InterpretersLive! Service, provided by Sign Solutions – visit <https://www.conwy.gov.uk/en/Council/Contact-Us/sign.aspx> for more information.

Where applicable, services will promote the availability of alternative formats and languages to ensure accessibility to information. For more information about translation and interpretation facilities in languages other than English and Welsh please contact equalities@conwy.gov.uk.