



# EQUALITY

## POLICY AND PROCEDURE

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## **INFORMATION**

Every person who works for Ramsey Town Commissioners (RTC) (The Authority) should expect to be treated equally, fairly and with dignity and respect. The Isle of Man Equality Act 2017 comprehensively deals with discrimination in respect of both employment and the provision of goods and services on the grounds ('protected characteristics') of:

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

This policy and associated procedure notes apply to all staff working within the organisation. It extends to include non-permanent workers such as contractors, agency, temporary staff, volunteers, suppliers and any other workers. It may also impact on those accessing RTC services.

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## **STATEMENT**

Ramsey Town Commissioners are committed to fairness, inclusivity and respect. We believe that equality, diversity and inclusion strengthen our organisation and the services we deliver to the people of Ramsey.

We aim to ensure that no employee, job applicant, elected Member or member of the public is treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation, in accordance with the Equality Act 2017 (Isle of Man).

We promote equality of opportunity in all our employment and service delivery practices and operate a zero-tolerance approach to discrimination, harassment and victimisation. All staff, Members and contractors are expected to uphold these principles and the standards set out in our Code of Conduct and Equality Policy.

## **POLICY**

RTC will provide and sustain a working environment that is free from discrimination and promotes equality of opportunity for all employees. Standards will be clearly set out both in a general set of principles, and where appropriate, in more specific terms in relation to particular roles.

The Equality Policy covers all aspects of employment, including recruitment redundancy, promotion, training, benefits, pay, and working conditions.

RTC is committed to promoting equality of opportunity and ensuring that no employee or job applicant is discriminated against based on any protected characteristic. The organisational culture will be inclusive, where everyone feels valued, respected, and empowered to achieve their full potential. Diversity is embraced, and individual differences are celebrated.

We are committed to providing equal opportunities in all aspects of employment, including but not limited to:

**Recruitment and Selection:** We will ensure that recruitment processes are fair and transparent, and that decisions are made based on the skills, experience, and qualifications required for the role, not on any personal characteristic.

**Training and Development:** All employees will have access to training and development opportunities, based on their role and individual needs, to ensure that they can reach their full potential.

**Promotion and Career Progression:** We will provide opportunities for career progression based on merit and will ensure that all employees have equal access to promotions and career advancement.

**Compensation and Benefits:** Pay and benefits will be determined by the role, performance, and the skills of the individual, without discrimination based on any personal characteristic.

**Workplace Environment:** We will ensure that our workplace environment is inclusive, respectful, and free from harassment, bullying, or discrimination.

An inclusive and diverse workforce is a strength and contributes to the overall success and sustainability of the organisation.

### **Accountability and Review**

This policy and procedure will be reviewed at least annually to ensure that it remains up to date and reflects the needs of RTC and its employees.

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## PRINCIPLES

### Prohibited Discrimination

[In accordance with law, discrimination based on the following protected characteristics is prohibited:

- Age
- Disability
- Gender Reassignment
- Marriage or Civil Partnership
- Pregnancy and Maternity
- Race (including ethnicity, nationality, and cultural background)
- Religion or Belief
- Sex (gender)
- Sexual Orientation

### Modes of Discrimination

**Direct Discrimination:** Treating someone less favourably because of a protected characteristic.

**Indirect Discrimination:** A policy or practice that applies to everyone but disadvantages people with a certain protected characteristic.

**Harassment:** Unwanted behaviour that creates an intimidating, hostile, or offensive environment.

**Victimisation:** Treating someone unfairly because they have made a complaint of discrimination or helped someone else make a complaint.

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## PROCEDURE

### Responsibilities

**Town Clerk:** The Town Clerk is responsible for overseeing the implementation and monitoring of this policy. They are also responsible for facilitating advice and training to managers and staff, and for investigating any complaints related to discrimination.

**Leadership and Management:** Senior leaders and managers are responsible for fostering an inclusive work culture and ensuring that equality principles are embedded in all organisational practices. They must lead by example and ensure compliance with this policy.

**Employees:** All employees have a responsibility to promote equality, avoid discriminatory behaviour, and treat colleagues with respect. Employees should report any incidents of discrimination, harassment, or bullying to their manager.

## **Recruitment and Selection**

RTC will ensure that all recruitment and selection practices are free from bias and will take active steps to ensure equal opportunities for all applicants, regardless of their background. This includes:

Ensuring job advertisements are inclusive and accessible to a wide range of candidates.

Using fair and transparent recruitment processes, including diverse selection panels, where appropriate.

Providing reasonable adjustments during the recruitment process for individuals with disabilities.

## **Harassment and Bullying**

Harassment and bullying of any kind will not be tolerated. Separate detailed policy and guidance has been published in respect of this.

## **Reasonable Adjustments**

RTC is committed to providing reasonable adjustments to employees with disabilities or other specific needs. This includes:

Modifying workstations or office layouts.

Providing assistive technology or equipment.

Offering flexible working arrangements where necessary.

Adjusting working hours or job duties to support employees with health conditions or disabilities.

Employees who require adjustments are encouraged to discuss their needs with their manager. From this, agreed and appropriate plans to accommodate those needs will be formulated.

## **Monitoring and Reporting**

The Town Clerk in association with the Establishments Committee will quarterly review workforce data to identify any disparities or trends related to recruitment, training, pay, promotions, and employee satisfaction. An annual employee survey will include assessment of perceptions of equality and inclusion.

The Town Clerk will also take action to address any identified issues of inequality or discrimination and will provide regular reports on progress to The Board.

## **Training and Development**

To ensure that all employees understand and uphold the principles of equality and diversity, training which must include;

- equality and diversity awareness,
- unconscious bias,
- inclusive leadership and management,
- harassment prevention and reporting.

Training will be mandatory for all employees and managers . Records will be kept alongside other staff training on personal files. Refresher training should be taken every two years.

## **Complaints and Grievances**

Employees believe they have been subjected to discrimination, harassment, or unfair treatment are encouraged to raise their concerns through the grievance procedure. All complaints will be taken seriously, investigated thoroughly, and addressed promptly.

## **EQUALITY IMPACT ASSESSMENT (EIA)**

A key methodology for the assurance of equality is through EIA. Each role in the organisation will be reviewed in accordance with this process and new roles will be evaluated, and signed off accordingly. See Appendix 1 for the associated Process

## **APPENDIX 1 – PROCESS FOR EQUALITY IMPACT ASSESSMENTS**

### **1. Review the Legal and Policy Framework**

Staff conducting an EIA should familiarise themselves with both the Equality Act 2017. This will help ensure EIA aligns with both legal obligations and organisational goals. The key principle is to demonstrate how the organisation is fulfilling the legal requirements to avoid discrimination against any protected groups.

In particular, understanding the distinction between direct and indirect discrimination will enable full evaluation of the potential for negative impacts in policy and practice.

### **2. Establish the Purpose of the EIA**

Identify the specific goals of the EIA. For example, is the goal to assess:

A comprehensive workforce equality audit, assessing the organisation's performance on key diversity and inclusion metrics.

The fairness of redundancy or workforce reduction processes?

The inclusivity of hiring, promotion, or training practices?

Employee benefits or pay structure equity?

This assists in tailoring the assessment toward areas of most concern.

### **3. Gather Comprehensive Workforce Data**

To perform a meaningful EIA, data on the entire workforce, segmented by protected characteristics is required. This data will help with understanding where there may be disparities or inequalities. These will include:

**Employee Demographics:** Gather data on age, gender, race, disability, religion, sexual orientation, and other relevant factors.

**Role Breakdown:** Understand how different groups are represented at various levels within the organisation, and in specific departments, roles, or functions.

**Workplace Policies:** Review of any existing policies related to recruitment, training, promotion, pay, benefits, and other workplace practices that may impact different groups.

Consider conducting employee surveys (voluntary) to gather additional qualitative data on perceptions of fairness and inclusivity in the workplace.

#### 4. Review Key Organisational Practices and Policies

Examine organisational processes to identify where the greatest risks of inequality may exist. This will include review of:

**Recruitment & Selection:** How are candidates selected? Are recruitment methods potentially excluding certain groups? Are there equal opportunities for candidates with disabilities, or do certain interview processes disadvantage certain demographic groups?

**Training & Development:** Are training opportunities provided equitably across all levels? Do any groups (e.g., women, minority ethnic groups) have fewer opportunities for development or career advancement?

**Promotion & Pay:** Are promotions or salary increases equally accessible to all employees? Is there evidence of pay gaps, especially by gender, ethnicity, or disability status?

**Working Conditions:** Are there flexible working options? Does the working environment accommodate employees with disabilities or those with caregiving responsibilities?

**Redundancy/Restructuring Processes:** How are redundancies decided? Do selection criteria or redundancy decisions disproportionately affect certain groups (e.g., older workers, women, people with disabilities)?

The EIA should focus on identifying any disproportionate impact these processes may have on any protected groups. If discrepancies exist, corrective actions need to be planned.

#### 5. Assess Potential Impacts on Protected Groups

For each of the workforce policies and practices, assess the potential impact on each of the protected characteristics:

**Direct Impacts:** Does the policy explicitly or indirectly disadvantage any group? For example, does a requirement for physical ability in certain roles disadvantage disabled employees?

**Indirect Impacts:** Could certain criteria unintentionally affect a group? For example, requiring a certain amount of experience or qualifications might disproportionately impact younger workers or people from minority ethnic backgrounds.

Consider both negative and positive impacts:

**Negative:** Could certain groups be excluded or disadvantaged (e.g., a gender bias in leadership selection)?

**Positive:** Does the policy promote inclusion or equality for underrepresented groups (e.g., diversity hiring practices)?

## 6. Consult with Key Stakeholders

Engage with employees and other stakeholders (e.g., unions, employee resource groups) to get feedback about the fairness and inclusivity of workplace policies. Consult via;

Surveys and questionnaires.

Focus groups or employee forums.

Discussions with trade unions or employee representatives.

Consulting directly with employees from diverse groups can provide insight into any areas where employees may feel disadvantaged or excluded, helping identify potential issues that may not be immediately obvious.

## 7. Identify Mitigation Measures

Identify any mitigation measures or actions to reduce or eliminate discrimination or inequality.

For example:

**Adjusting Selection Criteria:** Modify criteria that could disadvantage certain groups. For instance, ensure that attendance records don't unfairly disadvantage employees with disabilities or those with caregiving responsibilities.

**Implementing Training Programs:** Offer training for staff on unconscious bias or diversity and inclusion to ensure fair decision-making.

**Ensuring Access to Opportunities:** Provide equal access to promotions, career development, or training for all employees, especially those from underrepresented groups.

**Reasonable Adjustments:** Ensure that workplace adjustments are made for employees with disabilities or other specific needs, both for retention and recruitment.

Ensure that any identified actions are practical, achievable, and adequately resourced.

## **8. Document the Findings and Actions**

Create a comprehensive Equality Impact Assessment Report, which should include:

Summary of the organisation's policies and practices being assessed.

Data analysis: Present demographic data and any findings of disproportionate impact.

Mitigation plans: Outline the steps being taken to address any disparities.

Action plan: Specify timelines and responsible parties for implementing changes.

Monitoring & Review: Include a mechanism for reviewing the outcomes and ensuring ongoing fairness.

This documentation will be crucial for demonstrating compliance with equality and diversity standards, both internally and externally.

## **9. Monitor the Implementation of Changes**

After implementing changes, ensure that the effectiveness of the measures is regularly monitored. This can be done by:

Gathering employee feedback through surveys or focus groups.

Continuously analysing workforce data to track any changes in representation or opportunity for different groups.

Reviewing complaints, grievances, and disciplinary actions to ensure no group is being unfairly treated.

Regular audits and feedback loops help maintain an equitable and inclusive workplace over time.