



Equality, Diversity and Human Rights Policy - Progressive Recovery Care (PRC) Group LTD

Policy Summary

At Progressive Recovery Care (PRC) Group Ltd, we are firmly committed to promoting and embedding the principles of **equality, diversity, and inclusion (EDI)** in every aspect of our service delivery, workplace culture, and organisational operations.

This policy applies to all individuals who come into contact with our services, including children and their families, adults using care services, staff, partners, contractors, and other stakeholders. It affirms our responsibility to treat everyone with fairness, dignity, and respect—irrespective of their ethnicity, language, culture, faith, gender identity, age, disability, sexual orientation, neurodivergence, or any other protected characteristic as defined in the **Equality Act 2010** and associated **Human Rights legislation**.

We recognise that promoting inclusion and eliminating discrimination are essential not just for compliance, but for delivering high-quality, person-centred care. A key enhancement to this policy is the inclusion of a new section on **neurodiversity**, which outlines support measures and reasonable adjustments for neurodivergent individuals, such as those with autism, ADHD, dyslexia, and other cognitive differences.

While this policy does not replace formal grievance or disciplinary procedures, it provides essential guidance in resolving disputes and defending discrimination claims. It also reinforces our expectation that **everyone connected to our service**—staff and service users alike—has a responsibility to uphold the principles of equality and mutual respect.

Our Commitments and Approach

Progressive Recovery Care (PRC) Group Ltd expresses its commitment to equality, diversity, and inclusion by:

- **Respecting personal identity and culture:** Recognising and celebrating people's ethnic, religious, cultural, and personal backgrounds—including gender identity and sexual orientation—and creating space for them to express their individuality and participate in meaningful ways.



- **Promoting inclusive, person-centred care:** Involving service users in designing the support they receive, and ensuring care is shaped by their identity, preferences, beliefs, and lived experiences. For example, celebrating events or observances that are personally or culturally significant.
- **Challenging stereotypes and discrimination:** Treating people as individuals—not as cases, labels, or stereotypes—and ensuring discriminatory behaviour, such as racism, ableism, homophobia, transphobia, or religious intolerance, is neither tolerated nor ignored.
- **Demonstrating inclusive leadership:** Developing an organisational culture and management practices that reflect our values and actively promote social inclusion.
- **Setting clear expectations for staff and service users:** All staff are expected to act in accordance with this policy, uphold non-discriminatory practices, and support a safe, welcoming, and respectful environment. Service users are also expected to show mutual respect toward staff, including their ethnicity, gender identity, religious beliefs, or disabilities.
- **Embedding EDI in contracts and partnerships:** Ensuring that all external relationships, including commissioned services and contractors, reflect our standards and commitment to equality and inclusion.
- **Providing training and support:** All staff receive mandatory EDI training as part of induction, with annual refresher training to maintain awareness and embed practice. Supervision and appraisal processes also reinforce EDI responsibilities.

Relevant Legislation

- Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012
- Care Quality Commission (Registration) and (Additional Functions)
- Care Quality Commission (Registration) Regulations 2009
- Equality Act 2010 (including Chapters 1–3)
- Data Protection Act 2018
- Gender Recognition Act 2004



- UK General Data Protection Regulation (UK GDPR)

Evidence Base / Underpinning Knowledge

- Equality and Human Rights Commission (2011), *Employment Statutory Code of Practice*
- Government (2010), *Equality Act 2010*, legislation.gov.uk
- Equality and Human Rights Commission (2019), *Equality Act Guidance*
- EHRC (2022), *What is the Equality Act*, equalityhumanrights.com

CQC Quality Framework Alignment

Key Lines of Enquiry (KLOEs):

Key Question KLOE		Quality Statement
SAFE	S1: Safeguarding	QSS3: Safeguarding
WELL-LED	W2: Governance and performance	QSW5: Governance and sustainability

Policy Purpose

- 1. Promote fair access to services**
Ensure that no person applying for a service is refused based on protected characteristics such as ethnicity, gender identity, religion, disability, or sexual orientation—provided they meet the service eligibility criteria.
- 2. Prevent unequal treatment or substandard care**
Guarantee that no individual receives inferior services due to discrimination on any prohibited grounds.
- 3. Actively address discriminatory incidents**
Respond swiftly and appropriately when service users experience abuse or offensive treatment related to their protected characteristics—including ethnicity, religion, gender identity, or sexual orientation (e.g. LGBTQ+ identities).
- 4. Provide personalised, culturally competent care**
Work collaboratively with each individual to identify and meet their unique needs and



preferences, informed by their background, identity, culture, and values—recognising that care should never be ‘one size fits all.’

5. Foster mutual respect and inclusive relationships

Encourage all staff and service users to engage with each other respectfully, recognising and embracing diversity, and supporting individual identity and life choices, including those relating to LGBTQ+ or gender-diverse identities.

6. Promote self-awareness and challenge discrimination

Develop staff and service user awareness to identify and challenge discriminatory behaviour, including the use of offensive, exclusionary, or abusive language—ensuring that everyone understands such behaviour is unacceptable and contrary to the organisation’s values.

7. Ensure accessible and effective complaint procedures

Make sure all individuals are aware of how to raise concerns about discrimination, abuse, or inequality—including how these link to the organisation’s safeguarding policies—and ensure that these procedures are inclusive and accessible to all.

8. Address EDI-related complaints fairly and effectively

Investigate all incidents or complaints of discriminatory or oppressive conduct with fairness and transparency, ensuring responses are free from bias and uphold the principles of equality and human rights.

Scope of Policy

This policy applies to:

- All staff (employees, contractors, volunteers)
- Service Users
- Applicants and job candidates
- Visitors, suppliers, and external partners
- Commissioners and regulatory bodies

It applies in the workplace and externally when staff represent the organisation (e.g. on business trips, at work-related social functions, when wearing uniforms).

**Policy Lead:**

The lead responsible for this policy is:

Geneva Tabe

Role: Registered Manager

Contact: info@progressiverecoverycare.co.uk

They are responsible for ensuring the implementation, training, monitoring, and review of this policy.

Roles and Responsibilities

At Progressive Recovery Care (PRC) Group Ltd, we recognise that creating and maintaining an inclusive and equitable environment is a shared responsibility. Every individual within the organisation has a vital role to play in upholding the principles of equality, diversity, and human rights.

Managers and Supervisors

Managers are responsible for setting the tone and leading by example. Their responsibilities include:

- Ensuring compliance with all relevant equality, diversity, and human rights legislation and internal policies.
- Responding promptly to reports or incidents of discrimination, harassment, or inequality and taking appropriate action in line with disciplinary procedures.
- Providing and facilitating training for their teams on EDI principles, unconscious bias, and inclusive practices.
- Promoting a culture of inclusion, respect, and dignity through day-to-day interactions and leadership practices.
- Conducting risk assessments and implementing reasonable adjustments for staff and service users where necessary.
- Monitoring team dynamics to ensure equitable access to development opportunities, support, and resources.

All Staff Members

Progressive Recovery Care (PRC) Group LTD. Company House Number 15768666



All employees have a personal responsibility to:

- Uphold and actively promote the organisation's equality, diversity, and inclusion values in all interactions with colleagues, service users, stakeholders, and members of the public.
- Treat everyone with fairness, dignity, and respect, regardless of age, race, religion or belief, sex, sexual orientation, gender identity, disability, marital status, pregnancy or maternity status, or any other protected characteristic.
- Challenge discriminatory behaviour or language where it occurs and reports any incidents or concerns through the appropriate channels.
- Engage in training and professional development related to EDI to maintain awareness and understanding of best practice.
- Support reasonable adjustments for colleagues and service users where needed.

HR, Compliance, and EDI Leads

Human Resources and Compliance personnel are central to supporting the implementation and monitoring of our EDI strategy. Their responsibilities include:

- Monitoring and analysing EDI performance, workforce composition, and recruitment data to identify trends, risks, or areas for improvement.
- Supporting managers and staff in implementing inclusive practices, resolving concerns, and applying fair procedures.
- Maintaining accurate and secure records of EDI-related data and incidents in compliance with the UK General Data Protection Regulation (UK GDPR).
- Reviewing and updating policies, procedures, and training programmes to reflect legal developments, best practice, and internal findings.
- Reporting EDI outcomes to senior leadership to inform strategic planning and decision-making.
- Leading and coordinating awareness campaigns or initiatives that promote inclusion and celebrate diversity across the organisation.



Policy Principles and Commitments

1. Equal Opportunities

We are committed to eliminating all forms of discrimination, direct or indirect, on the grounds of:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy or maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

2. Recruitment and Employment

Progressive Recovery Care (PRC) Group Ltd is committed to fair, inclusive, and non-discriminatory recruitment and employment practices. We recognise that a diverse and representative workforce strengthens our service delivery and enhances the lived experience of those who use our services.

Job Advertising

- All job adverts will be written using inclusive and non-discriminatory language.
- Job descriptions and person specifications will focus on essential skills, qualifications, experience, and behaviours relevant to the role.
- We will proactively advertise roles through a wide range of platforms to reach diverse audiences, including underrepresented groups.

Application and Shortlisting Process

- All applications will be treated confidentially and assessed consistently against objective criteria.



- We will not ask health-related or disability-related questions during the recruitment process unless it is lawful to do so (e.g. to make reasonable adjustments or assess the applicant's ability to carry out a function intrinsic to the job).
- Shortlisting will be based solely on merit, skills, and experience.

Interviews and Selection

- Interview panels will aim to include at least two assessors to ensure impartiality and reduce the potential for unconscious bias.
- Standardised interview questions and scoring systems will be used to promote fairness and transparency.
- All assessors involved in the selection process will receive training in equality, diversity, and unconscious bias.

Reasonable Adjustments

- Progressive Recovery Care (PRC) Group Ltd will offer reasonable adjustments throughout the recruitment process for applicants who are disabled or neurodivergent.
- Adjustments may include (but are not limited to) alternative formats of application materials, extended time for tests or interviews, or modified interview environments.
- Applicants will be given the opportunity to request adjustments confidentially at any stage of the process.

Employment Practices

- We are committed to providing an inclusive and supportive working environment for all employees.
- Induction and ongoing training will include content on equality, diversity, and human rights.
- Staff will be supported with reasonable adjustments in the workplace where required, ensuring equal access to progression, development, and wellbeing initiatives.

Monitoring and Accountability

- We will collect and review anonymised data on recruitment and workforce diversity to identify any disparities or patterns of inequality.
- This data will inform our continuous improvement efforts in building an inclusive workforce that reflects the communities we serve.



3. Neurodiversity

We promote awareness and understanding of neurodiversity, including but not limited to:

- Autism Spectrum Disorder (ASD)
- ADHD
- Dyslexia
- Dyspraxia
- Dyscalculia

Employees are encouraged to disclose any neurodiverse conditions confidentially to their manager so that needs assessments, and reasonable adjustments can be implemented. Examples of adjustments include:

- Noise-cancelling headphones
- Clear visual instructions
- Quiet working areas
- Adjusted workloads or flexible hours

Managers will receive training on neurodiversity and are encouraged to foster peer networks, appoint neurodiversity champions, and promote awareness across the workforce.

4. Immigration and Right to Work

We do not assume immigration status based on appearance or name. All applicants must provide Right to Work documentation in line with the **Right to Work Checks Policy**.

5. Equal Treatment of Contract Types

Fixed term and part-time staff will receive the same treatment as full-time and permanent colleagues, unless different treatment is objectively justified.

Breaches of Policy

1. Disciplinary Action

- Breaches of this policy may lead to disciplinary action, up to and including dismissal.
- Serious acts of discrimination may constitute gross misconduct.



2. Grievance Procedure

- Staff are encouraged to report any discrimination or unfair treatment via the Grievance, Anti-Bullying, or Harassment Procedures.
- All complaints will be handled with sensitivity and confidentiality.
- False allegations made in bad faith may result in disciplinary action.

Definitions

Term	Definition
Victimisation	Retaliation against someone who raised or supported a discrimination complaint.
Discrimination	Unfair treatment based on a Protected Characteristic, whether direct, indirect, associative or perceptive.
Bullying	Offensive, intimidating, malicious or insulting behaviour that undermines, humiliates or threatens an individual.
Harassment	Unwanted conduct related to a protected characteristic that violates dignity or creates a hostile work environment (including sexual harassment).

Procedures to Ensure Implementation and a Culture of Inclusion

Progressive Recovery Care (PRC) Group Ltd reaffirms its statutory obligations under the Equality Act 2010, the Human Rights Act 1998, the Care Act 2014, the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, and UK General Data Protection Regulation (UK GDPR). As a registered care provider, we are legally and ethically committed to ensuring that Equality, Diversity, and Inclusion (EDI) principles are fully embedded across all aspects of our organisational infrastructure, service delivery, workforce practices, and leadership governance.

To operationalise this policy and uphold our legal duties, we have implemented the following structured procedures:



1. Code of Conduct and Statutory Behavioural Standards

- All personnel, whether employees, contractors, volunteers, or third-party affiliates, are bound by a legally compliant Code of Conduct which explicitly prohibits:
 - Direct or indirect discrimination.
 - Harassment (including sexual, racial, and disability-related harassment);
 - Victimisation; and
 - Any form of abusive, derogatory, or prejudicial behaviour based on a protected characteristic.
- Compliance with the Code is a condition of employment and continued engagement, enforceable under disciplinary procedures. Breaches may result in formal warnings, suspension, dismissal, or referral to relevant regulatory bodies, including the Disclosure and Barring Service (DBS) and Social Work England, where applicable.
- The Code aligns with and references relevant provisions under:
 - Section 149 of the Equality Act 2010 (Public Sector Equality Duty)
 - Regulation 10 and Regulation 13 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, relating to dignity and safeguarding from abuse.

2. Staff Training and Competency Development

- Mandatory EDI training forms a core element of induction for all new employees, incorporating modules on:
 - Equality legislation and human rights.
 - Unconscious bias.
 - Cultural competence.
 - Anti-racism and anti-discriminatory practice.
 - Reasonable adjustments under the Equality Act 2010.
- Training is formally refreshed annually, with additional ad-hoc updates provided in response to changes in law, CQC guidance, or identified organisational risks.



- Specialist EDI training is delivered to managers, safeguarding leads, and recruitment personnel to mitigate risks of structural bias, ensure equitable hiring practices, and support inclusive leadership.
- Competency in EDI principles is monitored through regular supervision, appraisal, and performance review cycles, with recorded evidence maintained in staff HR files in compliance with Regulation 18 of the Health and Social Care Act Regulations 2014.

3. Inclusive Service Provision and Impact Assessment

- Pinnacle ensures that all care plans, risk assessments, and support interventions are:
 - Person-centred and non-discriminatory.
 - Culturally responsive and inclusive of religious, gender, and linguistic needs.
 - Adapted where required to meet individual needs arising from disability, neurodivergence, or sensory impairment.
- All policies, procedures, and major operational decisions are subject to a formal Equality Impact Assessment (EIA) process, designed to:
 - Identify and mitigate potential adverse impacts on individuals with protected characteristics.
 - Ensure compliance with the Public Sector Equality Duty, even where not statutorily mandated.
 - Demonstrate proportionality and transparency in policy design and delivery.
- EIAs are reviewed annually or in response to significant legislative or operational change and are documented in accordance with best practice guidance issued by the Equality and Human Rights Commission (EHRC).

4. Safeguarding and Complaints Resolution

- Allegations or incidents involving:
 - Discrimination.



- Hate crime.
- Harassment or abuse related to protected characteristics;
are managed in accordance with our Safeguarding Policy, and where necessary:
- Escalated as safeguarding concerns.
- Reported to the Local Authority Designated Officer (LADO);
- Investigated under our Complaints and Incident Management Policy.
- Reported to external agencies such as the Police, CQC, or Safeguarding Adults Board (SAB).
- Complainants are entitled to advocacy, support, and a fair and transparent process that complies with:
 - The Care Quality Commission's key lines of enquiry (KLOEs).
 - Principles of natural justice and procedural fairness.
 - The Human Rights Act 1998, particularly Article 14 (prohibition of discrimination).

5. Information Governance and Data Protection

- All personal and sensitive data related to protected characteristics is managed in accordance with:
 - The UK General Data Protection Regulation (UK GDPR).
 - The Data Protection Act 2018;
 - The Caldicott Principles and ICO guidance.
- Information sharing is lawful, necessary, and proportionate where:
 - Required for safeguarding.
 - Permitted under multi-agency agreements (e.g. MARAC, MAPPA).
 - Legally mandated under statutory reporting obligations.
- Systems ensure secure digital and physical storage, clear data access protocols, and documented consent processes where required.



6. Governance, Review, and Policy Compliance

- EDI policy implementation is subject to robust governance and oversight, including:
 - Quarterly EDI audits;
 - Spot checks;
 - Data analysis of complaints, referrals, and outcomes disaggregated by protected characteristics.
 - Annual workforce equality monitoring.
- Supervisors and team leaders are accountable for daily compliance and must evidence EDI integration in shift reports, staff reviews, and operational practice.
- The Board of Directors holds ultimate accountability for EDI performance and ensures:
 - Annual Board-level review of this policy;
 - Publication of workforce equality data (where required under public contracts);
 - Compliance with commissioning and contractual EDI standards.

7. Staff Engagement, Communication, and Learning Culture

- This policy is disseminated through:
 - Internal communications;
 - Team briefings;
 - The Care Planner App (Quality Compliance Systems) for staff accessibility.
- Staff are encouraged and supported to:
 - Access external learning via the EHRC, Skills for Care, and professional CPD bodies;
 - Participate in reflective practice, case-based discussions, and EDI-themed learning events.
- Feedback from staff and service users is actively sought through:
 - Annual EDI surveys;



- Feedback forms;
- Focus groups;
- Exit interviews.

Findings inform continuous policy improvement and foster a responsive, evidence-based approach.

Statement on Culture of Inclusion

Progressive Recovery Care (PRC) Group Ltd is committed to cultivating a working and service delivery environment in which no protected characteristic is viewed as superior or subordinate to another. We actively promote intersectionality and recognise the complex ways in which discrimination can manifest—including in indirect, institutional, or unconscious forms.

We adopt a zero-tolerance approach to discrimination and are committed to proactive allyship, inclusive leadership, and the co-production of services with individuals from diverse backgrounds.

We believe that equality is not synonymous with uniformity, but with equity and fairness—ensuring that all individuals are treated with dignity, provided with appropriate support, and empowered to reach their full potential within a safe, inclusive, and rights-based environment.

Review

Signed:	G.Tabe
Named Person Accountable for Policy	Geneva Tabe
Creation Date:	25/06/2025
Next policy review date:	25/06/2026