

DIVERSITY, EQUITY AND INCLUSION POLICY

1. PURPOSE AND SCOPE

1.1 Somerset Community Foundation is committed to treating all members of the Somerset community fairly and regardless of ethnic origin, sexual orientation, religious belief, background, location, age, ability or other factors which sometimes give rise to discrimination. Some groups and communities face inequalities and injustices in the way opportunities and resources are shared in society. If we address these barriers and include people with a diverse range of lived and learned experiences, we know our work will be richer and make more of a difference.

1.2 The policy is based on best practice, legal advice and Charity Commission guidance on the Equality Act 2010 (i.e. that grant-making counts as service provision). It applies to all Foundation employees, Board members, self-employed associated and volunteers.

1.3 The purpose of this policy is to explain how we:

- comply with equality and anti-discrimination laws and regulation;
- go beyond legal requirements to understand, implement and promote greater diversity, equity and inclusion;
- live the Foundation's values including being fair and equitable in our behaviours, outlook and actions, while being committed to transforming lives and communities in Somerset; and
- make sure we tackle prejudice, discrimination and unconscious bias at the Foundation and across everything we do.

2. RESPONSIBILITY FOR IMPLEMENTING THIS POLICY

2.1 Ultimate responsibility for this policy rests with the Foundation's Board of Trustees. The Board delegates responsibility for implementation to the Chief Executive. However, everyone who works for the organisation, whether paid or unpaid, has an individual responsibility to work within and promote the policy.

2.2 Where it appears that there may be a breach of the policy, the Chief Executive¹ will investigate and take appropriate action. Complaints may be made externally through the Foundation's published complaints process or whistleblowing policy.

2.3 The Board will receive regular updates on diversity, equity and inclusion, including appropriate data on application of the policy, with actions to be included in the following year's plan. The Board will review the policy itself every three years.

3. GIVING AND PHILANTHROPY

¹ If the Chief Executive is accused of breaking the policy, then the Chair of Trustees will investigate and take appropriate action.

3.1 The Foundation seeks to involve donors from diverse backgrounds, so we offer options to give in line with different wishes and means. Some groups – notably people from Black, Asian and minority ethnic communities – are under-represented among our donors. So, we will take positive action to encourage and support people with protected characteristics and from other diverse backgrounds to take part.

3.2 Donors may establish named or collective funds at the Foundation with benefits restricted to people with one or more protected characteristics (for example: a Women’s Fund). We will accept such restrictions where the intention is to tackle greater needs or disadvantages linked to that protected characteristic. In such cases, donor’s wishes will be clearly set out in a fund agreement. Donors can also seek restrictions on who benefits from a fund that do not relate to a protected characteristic. For example, a fund can legitimately be restricted to people with a particular social need or disadvantage, a place, or a type of activity, without unlawfully excluding people with one or more protected characteristics.

3.3 Participation in Foundation fundraising activities can, where appropriate, be restricted to one sex or protected characteristic (for example: an holding an event to raise money for a Women’s Fund).

3.4 We advise donors and panel members on how this policy applies to funds and to grant recommendations. Where needed, we will constructively challenge donor assumptions and attitudes which are based on prejudices or unconscious bias. In line with our Gift Acceptance Policy, the Board reserves the right not to accept, or to return, a gift which is not in line with our values or charitable mission.

3.5 We also reserve the right not to approve grants recommended by donors or panels if doing so would conflict with this policy.

4. FUNDING AND SUPPORT

4.1 We make grants to a diverse range of charities and community organisations, and to individuals. We also support organisations with training and other help to improve governance, leadership and capabilities. We are committed to making our processes easy to use and we consider all requests for support on their merits and in line with our policies, priorities and fund criteria.

4.2 We will make grants or offer other support where the benefit is restricted to people with one or more protected characteristics, where doing so is a reasonable way of meeting a legitimate aim or is a justifiable means of achieving positive action. We will also take positive action to consult with, support applications from, or target funding towards groups led by or helping people with one or more protected characteristics, or other disadvantages. For example, in seeking to address hate crime experienced by lesbian, gay, bisexual and transgender people, we will seek to fund organisations set up by and serving those communities.

4.3 We ask grant applicants to tell us in their own words who and where their organisation is set up to benefit, and who will be helped by work they are asking us to fund. We make clear that our funding can benefit a specific population or place. Based on what applicants tell us, we record data on communities served by applicants and who benefit from our funding. Our data covers protected

characteristics and the focus of the work (e.g. ‘support for parents, families and carers’). We use this data to help us address gaps in support from us and others.

4.4 We also ask applicants to tell us how they make sure their organisation is welcoming to everyone they are set up to help, what they do to reach and include people and how they prevent and tackle prejudice and discrimination. Where appropriate, we ask for more information about their policies on diversity, equity and inclusion. If we think organisation’s policies and practices are not adequate, we will reject their request and/or offer other advice or support so they can improve.

4.5 In line with our grant-making policy, the Foundation welcomes applications from faith groups but we do not normally make grants to support religious activity which is not for wider public benefit.

5. KNOWLEDGE, RESEARCH AND ADVOCACY

5.1 The Foundation gathers, analyses, and shares knowledge as part of meeting our charitable purposes. In doing so, we will take positive action to help us to understand and address needs or lower levels of inclusion for people sharing one or more protected characteristics or experiencing other kinds of disadvantage. This might include policy and advocacy work, convening, targeted initiatives, or collaborations with other funders.

5.2 Where it is available, we will use good quality regional-level data about our area to set benchmarks so we can understand whether and how our people and our activities reflect the communities we serve. This is more useful than England or UK data which is affected by very different demographics elsewhere in the country.

6. GOVERNANCE AND ACCOUNTABILITY

6.1 We aim to have a Board with diverse lived and learned experience that broadly reflects communities in our area. We have standards and procedures to ensure open trustee recruitment, which aim to attract diverse candidates and give everyone a fair chance regardless of background. In advertising vacancies and when recruiting trustees, we will take positive action to make sure we attract under-represented groups.

6.2 Trustees are not required to have specific qualifications except where relevant to a role (e.g. accountancy qualifications for the post of Treasurer). Board and committee meetings take place at the most convenient times agreed collectively by members, with options for those not able to be there in person. Reasonable expenses are paid to support everyone’s participation.

6.3 Trustees sign a code of conduct, and must comply with our policies, and they can be removed by the Board if they breach them.

7. PEOPLE AND OPERATIONS

7.1 We aim to have a staff team with diverse lived and learned experience, relevant to their job roles, and broadly reflective of our communities. We have standards and procedures to ensure open staff recruitment which attracts diverse candidates and gives everyone a fair chance regardless of background. We will take positive action to

attract candidates from under-represented groups. We do not ask for specific qualifications unless they clearly link to a role's requirements.

7.2 We are committed to an inclusive and healthy working environment and culture, and to people having a positive balance in their lives. Our staff handbook includes this policy as well as policies on sickness, maternity, paternity, parental, adoption, and dependants' leave, flexible working and our grievance and disciplinary procedures. There are separate policies on anti-bullying and harassment and on safeguarding. Diversity, equity and inclusion are central to our standards for staff conduct.

7.3 The Foundation's offices are not fully accessible and not easily accessible by public transport. Therefore, we are conscious of this fact when scheduling meetings, and our team will always be accommodating when scheduling meetings with members of the public. When running activities in other locations, we seek to ensure easy access for disabled people and for people without cars.

7.4 The Foundation will provide induction and continuing training on this policy and other aspects of diversity, equity and inclusion to Board members, staff and volunteers.

8. COMMUNICATIONS, MARKETING AND WORKING WITH OTHERS

8.1 The Foundation recognises that it has some work to do to make sure its communications and marketing are designed to reach diverse audiences. This work includes designing a new website that is accessible in formats for disabled people, . We ask about communication, dietary or access needs when people book to attend our events. We would aim to make reasonable adjustments to meet these needs (e.g. by booking sign language interpreters or providing information in other languages or formats if required, subject to the likely effectiveness, practicality and cost).

8.2 We strive to listen to communities and to describe people in words they would themselves use, while recognising we need to be understood by a range of audiences. We recognise that some terms which categorise groups together (e.g. 'BAME', 'disabled' and 'LGBT') can be problematic as their use may hide very different experiences. Wherever appropriate, we aim to be clear who we are talking about and why. Where we are talking about communities who experience similar prejudice and discrimination – like sexism, racism, anti-Semitism, Islamaphobia or homophobia – we will say so.

8.3 We will gather and appropriately share data on diversity, equity and inclusion including about our Board, staff and grant beneficiaries, and on any related benchmarks or targets we set. We recognise that given the relatively small size of our team, and the nature of our work, our trustees and staff will not always fully reflect communities in our area. So, we will take positive action to make sure we engage and listen to the opinions and experiences of people and communities who are under-represented and who are affected by prejudice, discrimination and unconscious bias.

8.4 The Foundation seeks to apply this policy when we buy services and to work with partners and suppliers. Where possible, we will ask potential suppliers to demonstrate how they share our values.

ADDENDUM

OUR VALUES

We're here for everyone: We embed diverse perspectives throughout everything we do and welcome and value the uniqueness in everyone

We drive equity: We work to better understand the needs, challenges, dreams and aspirations of historically underfunded communities* and take positive action to redress the balance

We act with integrity: We're transparent about how and why we do things and always do the best we can

We lead with kindness: We're supportive, compassionate and respectful to each other and everyone we serve

We strive to be better: We seek and reflect on feedback and insight, foster collaboration, and share our learnings to get better results.

*For us, historically underfunded communities are communities who are marginalised or otherwise disadvantaged due to background, geography or other socio-economic factors that we have historically underfunded.

This includes, but is not limited to, organisations led by and for minority ethnic communities, people with disabilities and people who identify as LGBTQ+, as well as people living in the most deprived neighbourhoods, and people living in isolated rural communities.

DEFINITIONS

- **Diversity:** means people's different experiences, identities and points of view. For the Foundation, our focus is the diverse characteristics and backgrounds of our area's population. That includes legally protected characteristics and other things which can affect people's life chances, like appearance, gender identity, caring responsibilities, being from a working-class background, or being a migrant, refugee or asylum seeker.
- **Equity:** means everyone, no matter their background or characteristics, getting fair treatment and access to opportunities. This means recognising that some people experience *inequality* and *injustice*. So, for the Foundation, treating everyone the same ('equality') is not enough – we must strive to remove barriers people face.
- **Inclusion:** means everyone feeling they belong, being safe and respected, able to take part and realising their potential. For the Foundation, this involves striving to reach, listen to and involve people in our work who tend to be under-represented or whose voices tend not to be heard.

- **Protected characteristics** are defined in the Equality Act 2010 as:
 - age
 - disability (a physical or mental impairment which has a substantial and long-term effect on your ability to do normal day-to-day activities – it includes learning disabilities, autism spectrum disorders, sensory impairments, mental health issues, dementia and impairments resulting from injuries),
 - gender reassignment (transitioning from one gender to another),
 - marriage or civil partnership for same- or opposite-sex couples
 - pregnancy or maternity (if you are expecting a baby and the period after birth),
 - your race, colour, nationality, ethnic or national origin
 - having a religion or belief (including no religion) which affects the way you live,
 - your sex (whether you are a man or woman)
 - sexual orientation (whether you are sexually attracted to men, women, both or neither).

- **Positive action** in law means proportionate measures to help people with one or more protected characteristics to have the same chances as everyone else. This may include providing additional or targeted support to achieve equity, help address specific needs, overcome disadvantage linked to a protected characteristic or increase inclusion where there is under-representation.

- **Fund Agreement** in law is a formal document setting out the purposes for which donated funds must be applied. For the Foundation, this is normally our fund/ philanthropy agreement but could also be a Will, trust deed or other governing document.

- **Legitimate aim** in law is one which the Foundation can justify as effective on social policy grounds, or which is consistent with our charitable purposes for public benefit.

- **Prejudice** means an unjustified, usually negative, attitude towards a person or a group of people based on their different characteristics or background.

- **Discrimination** means treating a person or a group of people unfairly because of their differences. **Direct discrimination** means someone with a protected characteristic being treated less favourably than someone without that characteristic. **Indirect discrimination** is where a rule or practice applies to everyone, but it disadvantages people with a protected characteristic. **Discrimination by association** is where someone experiences direct discrimination because of their link to someone else's protected characteristic.

- **Reasonable adjustment** is a change an employer or provider of a service or activity must make to reduce a substantial disadvantage for a disabled person. Whether a proposed adjustment counts as reasonable depends on things like how far it would remove or reduce the disadvantage, and whether it's practical and affordable.

- **Unconscious bias** is where, without actively intending to, people favour others who are most like them, which can increase barriers for people from diverse backgrounds.

The Act also covers people who care for someone who is elderly or disabled as being 'associated' with someone whose characteristics are legally protected.