Ref: WF05

Equality and Diversity Policy

Executive Sponsor & Function:	Executive Director of Workforce & OD
Document Author:	Equality, Diversity & Inclusion Manager
Approved by:	Trust Board
Approval Date:	26 November 2026
Date of Equality Impact Assessment:	September 2026
Outcome of Equality Impact Assessment:	Continue to promote and monitor Equality, Diversity and Inclusion training across the Trust. Policy translation to Welsh. Ensure all new and revised policies, service developments and organisational changes are supported by Equality Impact Assessments. Monitor workforce equality data, staff survey feedback and staff network feedback to identify and address any inequalities or barriers.
Review Date:	November 2029
Version:	5

CONTENTS

1. Introduction / Purpose 3
2. Policy Statement 3
3. Objectives 3
4. Principles 4
5. Scope / Area Of Application 4
6. Legislation And Nhs Requirements 4
7. Roles And Responsibilities 5
8. Procedure / Main Body 6
9. Resources 7
10. Training 8
11. Implementation And Policy Compliance 8
12. Health And Care Standards 8
13. Integrated Impact Assessment 8
14. Environmental Impact 8
15. Audit 9
16. Review 9
17. Non-Conformance 9
18. Getting Help 9
19. References And Related Documents 9

Appendix 1: Protected Characteristics And The Equality Act 2010 10

Appendix 2: Equality Communication 11

Appendix 3: Responsibilities 12

1. INTRODUCTION / PURPOSE

This Equality and Diversity Policy provides the overarching framework for promoting fairness, dignity, respect and inclusion for all staff, patients, service users, volunteers and stakeholders. The policy sits at the centre of a cohesive Equality and Diversity Policy Pack and should be read together with the relevant operational sub-policies and guidance documents.

The purpose of this policy is to ensure equality and fairness throughout Velindre University NHS Trust and to support compliance with the Equality Act 2010, the Public Sector Equality Duty, National Terms and Conditions of Service for NHS employees and good practice guidance. The policy specifically relates to workforce issues and supports an inclusive working environment where equality of opportunity is actively advanced, barriers are removed and reasonable adjustments are made where required.

The policy also supports the principles of the Well-being of Future Generations (Wales) Act 2015 by contributing to a more equal, cohesive and inclusive organisation.

2. POLICY STATEMENT

Velindre University NHS Trust aims to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010; advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.

The Trust recognises that individuals may experience discrimination or disadvantage as a result of one or more intersecting protected characteristics. This will be taken into account in the implementation of this policy, decision-making and employment practices.

The Trust is committed to making reasonable adjustments to ensure equitable access to employment, development opportunities and the working environment for staff who require them. The Trust is also committed to ensuring that workplace communication, information and services are accessible and inclusive, including compliance with Welsh Language Standards and accessible communication requirements.

3. OBJECTIVES

- Promote equality, diversity, inclusion, fairness, dignity and respect across the Trust.
- Support compliance with equality, human rights, Welsh Language and NHS Wales requirements.
- Ensure equality considerations are embedded in employment policies, practices, decision-making and service developments.
- Support staff to achieve their full potential within a safe, inclusive and supportive working environment.
- Promote accessible and inclusive communication and engagement.

- Ensure concerns about unfair treatment, discrimination, harassment, bullying or hate-related behaviour can be raised through appropriate routes.
- Support the development, monitoring and delivery of the Trust Strategic Equality Plan.

4. PRINCIPLES

Velindre University NHS Trust will seek to employ a workforce that is representative of all sections of society within the communities it serves. The Trust is committed to equality of opportunity for all employees and prospective employees, regardless of protected characteristic, and to eliminating discrimination, harassment and victimisation in all aspects of employment.

The Trust aims to ensure that every employee feels respected, valued and able to be their authentic self, giving their best within a safe, inclusive and supportive working environment. Employees will be supported and encouraged to develop their full potential, and the talents, skills and experience of the workforce will be fully utilised to maximise the effectiveness of the organisation.

The Trust recognises and values individual difference and will not tolerate intimidation, bullying, harassment or hate-related behaviour. Staff will be supported where they feel they are being unfairly treated and encouraged to report concerns using appropriate and safe reporting routes.

5. SCOPE / AREA OF APPLICATION

This policy applies to all employees of Velindre University NHS Trust, including those employed on a permanent, temporary, fixed-term, bank, agency or honorary basis, as well as volunteers, including those working within hosted organisations.

The policy also applies to job applicants, potential employees, students, trainees, apprentices and secondees undertaking work or placements within the Trust. It applies to all stages of employment, including recruitment and selection, employment, training and development, promotion and termination of employment.

The principles of this policy apply to behaviour in the workplace and to work-related activities, including training, events, meetings and online or digital working environments.

6. LEGISLATION AND NHS REQUIREMENTS

This policy complies with relevant legislative and NHS requirements, including:

- Equality Act 2010 and Public Sector Equality Duty.
- National Terms and Conditions of Service, Agenda for Change, Equality and Diversity Statement.
- Human Rights Act 1998.
- Well-being of Future Generations (Wales) Act 2015.
- Welsh Language (Wales) Measure 2011 and associated Welsh Language Standards.
- NHS Wales equality and human rights requirements and guidance.

7. ROLES AND RESPONSIBILITIES

Clear responsibilities for equality, diversity and inclusion apply at all levels of the organisation. All staff and managers are responsible for promoting equality, preventing discrimination and fostering an inclusive working environment.

Role	Responsibilities
Board members	Set strategic direction, review performance and ensure good governance, with equality, diversity and human rights considered in policies, strategies and service developments.
Senior managers	Oversee the design, delivery, quality and effectiveness of organisational functions, demonstrate inclusive leadership and ensure equality is embedded in recruitment, workforce management, decision-making and service delivery.
Managers	Implement this policy within their areas, embed equality considerations into people management and day-to-day behaviours, promote inclusive teams and ensure concerns are addressed appropriately.
Equality Manager	Raise awareness, provide advice and build capacity regarding equality duties and support employees and managers to meet their responsibilities.
Workforce and OD officers	Build equality considerations into employment policies, procedures and people practices.
Communications officers	Ensure information is available and accessible to employees, service users and wider communities, taking account of protected characteristics, Welsh Language Standards and accessible communication requirements.
Workforce information officers	Support the collection and reporting of equality characteristics and workforce information to monitor the effect of Trust policies and practices.
Frontline employees	Treat colleagues, service users and the public with dignity and respect, and meet the needs of people from protected groups in line with Trust values and policies.
Trade union representatives	Contribute to the equality agenda and support members who have concerns about equality, fairness or inclusion.

8. PROCEDURE / MAIN BODY

8.1 EQUALITY POLICY PACK

This policy is the umbrella policy for the Equality and Diversity Policy Pack. Dedicated sub-policies provide more detailed operational guidance. Staff and managers should consider the main policy and related sub-policies together to support a holistic and intersectional approach to workforce support.

Other equality-related policies and guidance include Supporting Staff with Specific Needs, Supporting Transgender Staff Policy, Supporting Staff who are Carers Policy and the Procedure for Delivering Interpreting Services.

8.2 PROTECTED CHARACTERISTICS

The Equality Act 2010 identifies nine protected characteristics. These are:

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

The duty applies to marriage and civil partnership only in respect of the requirement to have due regard to eliminating discrimination.

8.3 STRATEGIC EQUALITY PLAN AND MONITORING

The Trust will seek to achieve equality and fairness through its Strategic Equality Plan. The Trust will make every effort to improve the collection of staff equality data so that the Strategic Equality Plan remains appropriate and current.

Progress towards the Strategic Equality Plan and information contained in the Workforce Profile will be discussed through relevant governance routes. Where any shortfall or cause for concern is identified, further analysis will be undertaken and appropriate action plans agreed and monitored. This may include positive action where lawful and appropriate.

8.4 EMPLOYMENT PRACTICES AND EQUALITY IMPACT ASSESSMENT

The Trust will regularly review its employment practices and procedures to ensure fairness, compliance with law and good practice. All new and existing policies, service changes and developments will be impact assessed using the Trust Equality Impact Assessment tool to support compliance with legislation and good practice.

Recruitment processes will seek to ensure that all potential and actual applicants have equality of opportunity when applying for posts and following appointment. Equality principles will also apply to wider employment practices, including training, development, promotion, flexible working considerations and retire and return arrangements.

8.5 REASONABLE ADJUSTMENTS AND ACCESSIBILITY

Specific arrangements may be required to accommodate particular groups. These may include reasonable adjustments to facilities, catering, the workplace, working arrangements or communication methods. The Trust is committed to making reasonable adjustments where required to support equitable access to work, development opportunities and the working environment.

Full account will be taken of the Welsh Language Standards, the Trust Bilingual Skills Strategy and the promotion of the Welsh language. Workplace communication, information and services should be accessible and inclusive.

8.6 RAISING CONCERNS

Where an individual feels they have been treated unfairly from an equality perspective, they should raise the matter with their manager in the first instance where appropriate. Where the issue relates to treatment by another person, it may be addressed through the Trust Dignity at Work procedure, Grievance Policy, Speaking Up Safely arrangements or other relevant Trust policies.

If the individual feels stressed by the situation, they should refer to the Management of Stress Policy. If the issue relates to an application for employment, the individual may raise the concern with the appointing officer and, where not resolved, through the complaints process. The Trust will endeavour to deal with concerns promptly, fairly and sensitively.

8.7 ENGAGEMENT AND COMMUNICATION

Employee engagement will be promoted through staff networks, equality champions and other mechanisms that support involvement, voice and inclusion. The Trust will make every effort to keep employees informed of equality-related news, initiatives and developments, and to encourage discussion of relevant issues.

Further engagement may be undertaken through the NHS Wales Annual Staff Survey, staff networks, newsletters, intranet communication, formal engagement events, feedback mechanisms and other accessible routes.

9. RESOURCES

Implementation of this policy is supported through existing Trust governance, Workforce and OD, Equality, Diversity and Inclusion, Communications, management and staff engagement structures. Resource requirements may include staff time, training provision, communication resources, equality impact assessment activity, workforce data monitoring and reasonable adjustments where required.

10. TRAINING

Equality and Diversity training forms part of the Trust core skills training requirements. Employees are required to undertake the Treat Me Fairly e-learning package and/or classroom Equality Training sessions on a three-yearly basis. This may be supplemented by more detailed or specific training by request, or to support specific initiatives.

Training will be delivered to managers through e-learning, formal training programmes and informal discussion of specific equality issues such as equality impact assessment. Management development and organisational development programmes will include equality, diversity, inclusion and human rights elements wherever possible, supporting inclusive leadership, fair decision-making and compliance with legal and NHS Wales requirements.

11. IMPLEMENTATION AND POLICY COMPLIANCE

The principles of this policy will underpin all policies, practices and decision-making within Velindre University NHS Trust. Equality in the workplace is good management practice and supports the delivery of fair, inclusive and effective services.

Managers are responsible for implementing this policy within their areas of responsibility and ensuring equality considerations are embedded in decision-making, people management practices, service delivery and day-to-day behaviours.

12. HEALTH AND CARE STANDARDS

This policy supports safe, inclusive, respectful and fair working environments. It contributes to quality, safety, dignity, voice, learning, improvement, workforce wellbeing, equality of opportunity and good governance by embedding equality considerations into employment practices, policy development and service delivery.

13. INTEGRATED IMPACT ASSESSMENT

This policy has been impact assessed and has not been found to be discriminatory in accordance with the Equality Act 2010 and the Human Rights Act. The Equality Impact Assessment process considered the potential impact of this policy on all protected characteristics and identified no adverse impact. Where potential impacts are identified in future reviews, appropriate mitigating actions will be identified and implemented.

14. ENVIRONMENTAL IMPACT

No specific environmental impact has been identified within this policy. Where changes to communication, engagement, training materials or working arrangements are considered, environmental considerations should be taken into account where relevant and proportionate.

15. AUDIT

The policy will be monitored on an annual basis, including through workforce data, Equality Impact Assessments, staff engagement feedback and governance reporting arrangements. Audit and review activity should consider whether the policy remains current, accessible, understood and consistently applied.

16. REVIEW

This policy will be formally reviewed on a three-yearly basis, or earlier where required to reflect changes in legislation, NHS Wales requirements, organisational priorities or learning arising from monitoring, audit or review activity.

17. NON-CONFORMANCE

Failure to comply with this Equality and Diversity Policy, including behaviour that constitutes discrimination, harassment, victimisation or failure to uphold equality responsibilities, will be regarded as misconduct and may lead to disciplinary action in accordance with the Trust Disciplinary Policy and procedures. Appropriate action will be taken in line with the seriousness of the breach and may include informal action, formal disciplinary proceedings or other management action as appropriate.

18. GETTING HELP

For interpretation, advice or support in relation to this policy, staff and managers should contact their line manager, Workforce and OD, the Equality Manager or other appropriate Trust support routes. Concerns should be raised through the relevant Trust policy or reporting process, depending on the nature of the issue.

19. REFERENCES AND RELATED DOCUMENTS

- Equality Act 2010.
- Public Sector Equality Duty.
- Human Rights Act 1998.
- Well-being of Future Generations (Wales) Act 2015.
- Welsh Language (Wales) Measure 2011 and associated Welsh Language Standards.
- National Terms and Conditions of Service, Agenda for Change, Equality and Diversity Statement.
- NHS Wales equality and human rights requirements and guidance.
- Velindre University NHS Trust Strategic Equality Plan.
- Supporting Staff with Specific Needs.
- Supporting Transgender Staff Policy WF46.
- Supporting Staff who are Carers Policy WF40.
- Procedure for Delivering Interpreting Services WF55.
- Dignity at Work procedure, Grievance Policy, Speaking Up Safely arrangements, Management of Stress Policy and Disciplinary Policy.

APPENDIX 1: PROTECTED CHARACTERISTICS AND THE EQUALITY ACT 2010

The Equality Act 2010 brought together and replaced previous anti-discrimination laws with a single Act. It simplified and strengthened the law, removed inconsistencies and made it easier for people to understand and comply with it. The Act includes the Public Sector Equality Duty, replacing the separate duties on race, disability and gender equality.

The general duty requires public bodies, when exercising their functions, to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.

Advancing equality of opportunity involves removing or minimising disadvantages experienced by people due to protected characteristics, taking steps to meet different needs and encouraging participation where participation is disproportionately low. Fostering good relations involves tackling prejudice and promoting understanding.

APPENDIX 2: EQUALITY COMMUNICATION

Equality communication applies to service users as well as employees. Given the size and importance of the equality agenda, particularly in relation to the Public Sector Equality Duty and accessible communication requirements, the Trust will support a two-way, inclusive and accessible communication approach.

The key aims are to communicate equality, diversity and human rights activity and messages to employees, the Trust, the public, seldom-heard and underrepresented groups, public sector and third sector partners and other key stakeholders; enable two-way communication and meaningful engagement; and support training and awareness through accessible information, resources and toolkits.

- Monthly equality newsletters, Trust communications, intranet news and links to significant equality calendar dates.
- Equality and accessible healthcare web pages, internally and externally.
- Formal engagement and consultation events, including targeted engagement where appropriate.
- Development and support of staff networks and stakeholder groups.
- Media and digital communications, including social media and press releases.
- Awareness and marketing events for equality programmes.
- Surveys, questionnaires, suggestion boxes and digital feedback routes.
- Links with patient experience, concerns, complaints and partnership working.
- Equality and accessibility information within training and development activity.
- Ongoing exploration of innovative communication routes to improve reach, engagement and accessibility.

The Trust communication strategy should be underpinned by equality considerations, with regular communication with the Communications Team. Accessible formats should be considered fundamental to inclusive communication.

APPENDIX 3: RESPONSIBILITIES

It is important for all employees of Velindre University NHS Trust to be aware of the Public Sector Equality Duty so that it is considered in their work where relevant. Responsibilities include strategic leadership, inclusive management practice, advice and support, accessible communication, workforce monitoring, respectful frontline behaviour and trade union contribution to the equality agenda.