

# 3SC Equality and Diversity Policy

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## The Issue Status

The Issue Status is indicated by the version number in the footer of this document. It identifies the Issue Status of the 3SC Equality and Diversity Policy. When any part of this document is amended, a record is made in the Amendment Log shown below.

The 3SC Equality and Diversity Policy can be fully revised and re-issued at the discretion of the 3SC Senior Management Team.

Further information and policy on Document Control and Control of Records is recorded in section 7 of the 3SC Business Management System Quality Manual.

Issue	Amendment	Date	Initials	Signed off by	Review Date
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2.3	Removed Third Part Harassment from section 3. The Law	January 2015	C O’K	KY	January 2016
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3.1	Addition of Gender Identity section	December 2016	NB	JC	November 2017
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3.4	General review	March 2020	DB	JC	March 2022
3.5	Change of office address	May 2020	DB	JC	March 2022

3.6	Addition of Public Sector Equality Duty Checking and amending of formatting (DR)	November 2020	DB	JC	November 2022
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## 1. Introduction

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### 1.1 Our Commitment

3SC is committed to providing equal opportunities in employment and to avoiding unlawful discrimination in recruitment, selection, employment and in services relating to 3SC's stakeholders including partners, suppliers and beneficiaries. As an employer, 3SC is committed to valuing diversity in the workplace, by creating an environment in which individual differences and the contributions of all our staff are recognised and valued.

Our goal is to ensure that these commitments, reinforced by our values, are embedded in our day-to-day working practices with all our customers, colleagues, Supply Chain Delivery Organisations and partners.

We will demonstrate our commitment by:

- promoting equality of opportunity and diversity within the communities in which we work and with all our partners and workforce
- aiming to build a workforce which reflects our customer base, within the diverse communities in which we work, with the aim of having parity of representation across the workforce
- encouraging recruitment from groups currently under-represented and their career progression once employed
- reviewing our employment practices to ensure fairness
- treating our customers, colleagues and partners fairly and with respect
- promoting an environment free from discrimination, bullying and harassment, and tackling behaviour which breaches this
- recognising and valuing the differences and individual contribution that people make
- providing support and encouragement to staff to develop their careers and increase their contributions to the organisation through the enhancement of their skills and abilities

Every person working for 3SC has a personal responsibility for implementing and promoting these principles. Compliance with this policy should ensure that employees do not commit unlawful acts of discrimination. Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. 3SC has a separate Bullying and Harassment policy, which deals with these issues.

## **1.2 Training**

3SC will provide Equality and Diversity training to all existing and new employees and others engaged to work at 3SC to help them understand their rights and responsibilities in relation to equal opportunities, to create a working environment that values diversity and is free of discrimination.

3SC line managers will be responsible for ensuring they actively promote equal opportunity within the departments for which they are responsible.

All 3SC staff are expected to read and comply with the Bullying and Harassment policy to ensure they understand what they can do to help create a working environment free of bullying and harassment. Where needed 3SC will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

## **1.3 The Law**

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy & maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief (including philosophical belief), or because someone is married or in a civil partnership. These are known as "protected characteristics".

Discrimination after employment is also unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.

Staff should not discriminate against or harass a member of the public in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

## **2. Types of Unlawful Discrimination**

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### **2.1 Direct Discrimination**

Direct Discrimination occurs when a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

### **2.2 Indirect Discrimination**

Indirect discrimination occurs where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

### **2.3 Harassment**

Harassment occurs where a person suffers unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

### **2.4 Associative Discrimination**

Associative discrimination occurs where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

## **2.5 Perceptive Discrimination**

Perceptive discrimination occurs where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

## **2.6 Victimisation**

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so. However, an employee is not protected from victimisation if he or she acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare his or her treatment with someone who has not made or supported a complaint under the Equality Act 2010. For example, if a blind employee raises a grievance that the employer is not complying with its duty to make reasonable adjustments and is then systematically excluded from meetings such behaviour could amount to victimisation.

## **2.7 Failure to Make Reasonable Adjustments**

Failure to make reasonable adjustments occurs where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

## **3. Equal Opportunities in Employment**

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### **3.1 Overview**

3SC will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary. 3SC will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if 3SC considers it has good reasons, unrelated to any protected characteristic, for doing so. 3SC will comply with its obligations in relation to statutory requests for contract variations. 3SC will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

3SC will monitor the ethnic, gender and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

3SC cannot lawfully discriminate in the selection of employees for recruitment or promotion, but the Company may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group that the Company identifies as being under-represented in particular types of job.

### **3.2 Gender Identity**

Gender identity refers to an individual's "personal sense of her or his gender" or inner sense of being a man or woman, regardless of biological sex.

Some people experience a gender identity that is somewhat, or completely, inconsistent with their sex appearance; or they may regard themselves as gender neutral, or non-gender, or as embracing aspects of both man and woman and, possibly, falling on a spectrum between the two. People have the right to self-identify, and many people reject the whole idea of binary

tick-boxes, and describe themselves in non-binary, more wide-ranging, open terms such as pan-gender, poly-gender, third gender, gender queer, neutrois and so on.

Gender reassignment is the process of transitioning from one gender to another. This is a personal process, not a medical process. This means that someone does not need to have undergone surgery or be under any kind of medical supervision to be classed and protected as transgender. When an individual decides to live openly in their acquired gender, they have made a social transition.

The Equality Act 2010 outlaws' discrimination in employment and vocational training on the grounds of gender reassignment. Harassment or bullying on the grounds that a person is proposing to transition, is transitioning or has transitioned is unlawful discrimination and will not be tolerated at 3SC. Gender reassignment is one of the nine protected characteristics protected by the act.

There is no requirement for a transgender and transsexual person to tell 3SC about their gender reassignment status and questions about a possible transgender status should not be asked. It is unlawful to refuse to work with someone with the protected characteristic of gender reassignment.

3SC will only identify a person's transsexual status if we have permission to do so. 'Outing' a person as transsexual is classed as direct discrimination under the Equality Act 2010 and could result in criminal charges under the Gender Recognition Act 2004. Disclosure of the fact that an employee has obtained a gender recognition certificate is a criminal act subject to a fine. If during the recruitment process information is disclosed about a job applicant's gender history, for example because certain documents are in a previous name, 3SC will keep the applicant's gender history confidential and will not take this into account in the selection process, unless an occupational requirement makes this relevant.

### **3.3 Dealing with the Transition**

3SC will be supportive of any employee who expresses an intention to transition and will work with him/her to try to ensure as smooth a transition at work as possible. Matters to be addressed may include the following:

*The employees' job:* Consideration will be given to whether the employee wishes to stay in the same job and location or, if possible, to move post and/or location. In the rare cases where an occupational requirement applies to the post, a change of job may be required.

*Time off:* The employee may require time off for medical or other treatment. Time off for these purposes will be treated no less favourably than time off for illness or other medical appointments.

Change of social gender: Consideration will be given to:

- when the employee expects to change name and to start presenting at work in the new gender;
- how work colleagues and clients are to be informed of the change;
- whether the employee wishes to inform colleagues and clients of the change or have someone from the organisation do this;
- what information or training is to be given to managers and work colleagues;
- the point at which the employee will start to use any single-sex facilities, such as toilets, in his/her new gender.

Dress codes: If there is a dress code applying to the job done by the employee consideration will be given to what, if any, flexibility may be required to accommodate the transition.

Records: After an employee has transitioned, records relating to the transition will be destroyed. The organisation will create a new personnel record to ensure confidentiality.

### **3.4 Dignity at Work**

3SC has a separate Bullying and Harassment policy concerning issues of bullying and harassment on any ground, and how complaints of this type will be dealt with.

### **3.5 Partners, Suppliers, Beneficiaries and other people not employed by 3SC**

3SC will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by 3SC.

Employees should report any bullying or harassment by customers, suppliers, visitors or others to their manager who will take appropriate action.

### **3.6 Your Responsibilities**

Every employee is required to assist 3SC to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, 3SC for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against 3SC employees or other 3SC stakeholders are disciplinary offences and will be dealt with under 3SC's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

### **3.7 Grievances**

If you consider that you may have been unlawfully discriminated against, you may use 3SC's grievance procedure to make a complaint. If your complaint involves bullying or harassment, the grievance procedure is modified as set out in the dignity at work policy.

3SC will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Use of the 3SC's grievance procedure does not affect your right to make a complaint to an employment tribunal. Complaints to an employment tribunal must normally be made within three months from the date of the act of discrimination.

### **3.8 Monitoring and Review**

This policy will be monitored periodically by 3SC to judge its effectiveness and will be updated in accordance with changes in the law. In particular, 3SC will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, 3SC will implement them.

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.

### **3.9 Benefits, Facilities and Services**

All terms of benefits, facilities and services will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

## **4. Human Rights and Equalities**

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### **4.1 Human Rights**

Human rights are the basic rights and freedoms that belong to every person in the world, from birth until death. They apply regardless of where you are from, what you believe or how you choose to live your life. They can never be taken away, although they can sometimes be restricted – for example if a person breaks the law, or in the interests of national security.

These basic rights are based on shared values like dignity, fairness, equality, respect and independence. These values are defined and protected by law. In Britain our human rights are protected by the Human Rights Act 1998.

The Human Rights Act 1998: sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000.

### **4.2 The Equality and Human Rights Commission**

The Equality and Human Rights Commission is the regulatory body responsible for enforcing the Equality Act 2010. Their duties include reducing inequality, eliminating discrimination and promoting and protecting human rights.

The focus of their regulatory role is to help organisations achieve what they should, not catch them out if they fall short. To help them to do this, they have a range of powers. These include providing advice and guidance, publishing information and undertaking research.

### **4.3 The Equality Act 2010**

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. The Equality Act came into force from October 2010 providing a modern, single legal framework with clear, streamlined law to more effectively tackle disadvantage and discrimination. The Equality Act 2006 remains in force (as amended by the Act) so far as it relates to the constitution and operation of the Equality and Human Rights Commission.

It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. It sets out the different ways in which it's unlawful to treat someone and harmonises all previous equalities legislation to

provide Britain with a discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

The Act also strengthens the law in a number of areas including placing a new duty on certain public bodies to consider socio-economic disadvantage when making strategic decisions about how to exercise their functions.

The characteristics that are protected by the Equality Act 2010 are:

- Age.
- Disability.
- Gender Reassignment.
- Marriage or Civil Partnership (in employment only)
- Pregnancy and Maternity.
- Race.
- Religion or Belief.
- Sex.



## 5. The Public Sector Equality Duty

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### 5.1 Background

The Public Sector Equality Duty came in to force in April 2011 (s.149 of the Equality Act 2010). The **Public Sector Equality Duty** is a duty on **Public Authorities** to consider or think about how their policies or decisions affect people who are **protected** under the Equality Act. Private organisations and individuals do not have to comply with the duty. However, for ESF funded projects the spirit of the public sector equality duty applies to the services that are to be provided.

### 5.2 The Equality Duty

This annex applies to 3SC staff, subcontractors' staff and participants in the ESF/GLA funded Parental Employment project alike.

3SC and their subcontractors recognise the importance of the Equality Act 2010 and the related Public Sector Equality Duty and have made a clear commitment to have due regard to the need of the three aims of the general duty.

The subcontractors for the GLA/ESF funded Parental Employment project are:

- The Write Time
- Belinda Grow
- Successful Mums

The Equality Duty means that public authorities are required, in carrying out their functions, to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010. As required by the Public Sector Equality Duty, in the exercise of our functions to deliver the GAL/ESF funded Parental Employment project, 3SC and its subcontractors will have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.



These are sometimes referred to as the three aims or arms of the general equality duty. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

### **5.3 Protected Characteristics**

People who are protected under the Act have what are called ‘Protected Characteristics’. The characteristics that are protected in relation to the public sector equality duty are:

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

Marriage and civil partnership are also protected characteristics under the Equality Act but is not covered by the public sector equality duty.

### **5.4 Applying the Public Sector Equality Duty**

When making decisions about how we will provide services and implement policies, 3SC and its subcontractors will always consider things like discrimination and the needs of people who are disadvantaged or suffer inequality. We will integrate consideration of equality and good relations into the day-to-day business of managing and delivering the GLA/ESF funded Parental Employment project.

3SC and its subcontractors recognise that if you do not consider how a function can affect different groups in different ways, it is unlikely to have the intended effect. This in turn can contribute to greater inequality and poor outcomes. To ensure we are meeting the equality duty we will consider how the service being delivered can positively contribute to the



advancement of equality and good relations. We will reflect this through the design of policies and the delivery of services to ensure these issues are kept under review.

We recognise the importance of being able to provide services to meet the diverse needs of our users, which in turn will support us to deliver the Parental Employment project more efficiently.

We also acknowledge that a supportive working environment is more productive, enabling us to draw on a broader range of talent that better represents the community the project will serve. Our intention is to provide a service that is appropriate to the user, and services that are effective, which in turn will lead to increased satisfaction with services offered as part of the Parental employment project.

The contract management process will include a review of how well subcontractors are meeting the Equality Duty to ensure that any sub-contractors promote equality in line with legal requirements. This includes a commitment to:

- monitoring of progress towards key objectives in the Equality Duty Action Plan
- monitoring representation and performance of different groups (sex, race, disability, and age) who participate in the ESF/GLA funded Parental Employment project.



## 6. The Equality Duty Action Plan

### 6.1 Action Plan

Staff		
Criteria	3SC staff	Subcontractors
<p>How staff will be trained in equality and diversity</p> <p>How training will be reviewed</p>	<ul style="list-style-type: none"> <li>• 3SC have a mandatory requirement for all staff to attend Equality and Diversity training.</li> <li>• Face to face training with the HR partner forms part of the staff induction process.</li> <li>• All 3SC staff access on-line training modules and any additional equality training their role requires, as identified through the objective setting process and on-going discussions between staff and line managers.</li> <li>• 3SC staff send a copy of their personal development requirements to the Risk and Quality Manager to ensure training needs are considered when reviewing the training plan.</li> <li>• Training records are held by HR and the RQM. Discussions during one-to-one meetings include reviews of training attended and the impact of training on behaviours.</li> </ul>	<ul style="list-style-type: none"> <li>• All delivery staff will be trained in equality and diversity.</li> <li>• The content of equality and diversity training will be reviewed as part of due diligence.</li> <li>• Staff training records will be provided to 3SC as part of due diligence.</li> <li>• Training attended/required by subcontractor's staff will be discussed during monthly Contract Performance Assessment (CPA) meetings.</li> </ul>



<p>Annual monitoring of staff by characteristics – sex, race, disability, age (with a view to identifying any significant under-representation)</p>	<ul style="list-style-type: none"> <li>• The 3SC application form includes an equality monitoring form which applicants are asked to complete.</li> <li>• The completed form provides the HR partner with information about the characteristics of all 3SC staff.</li> <li>• Monitoring of staff characteristics is completed annually by the CEO and HR partner with a view to identifying any significant under-representation.</li> <li>• Advertising of any future vacancies that encourages under-represented groups to apply. For example, focused advertising on specific websites such as <a href="https://www.bamerecruitment.com/">https://www.bamerecruitment.com/</a> or <a href="https://www.evenbreak.co.uk/en">https://www.evenbreak.co.uk/en</a></li> </ul>	<ul style="list-style-type: none"> <li>• The characteristics of staff who deliver the project will be recorded to identify any under-representation.</li> <li>• Delivery staff characteristics (where provided) will form part of the information needed for due diligence.</li> <li>• Due diligence annual reviews will include a review of delivery staff characteristics.</li> <li>• Support will be provided to subcontractors by 3SC to help them to put actions in place to resolve any significant under-representation.</li> </ul>
<p>Actions to help ensure that staff have equality objectives in personal development and appraisal processes.</p>	<ul style="list-style-type: none"> <li>• Each year 3SC staff are required to take part in an objective setting process with their line manager to set up to five annual objectives.</li> <li>• Objectives relate to 3SC’s vision, mission and values and include areas for improvement, challenges, special projects, or personal development.</li> <li>• 3SC staff involved in the delivery of the GLA/ESF funded Parental Employment project will be required to set at least one equality objective.</li> <li>• Annual reviews of objectives allow staff to take pride in the achievement of their goals and see their progress ensuring they move forward and develop.</li> </ul>	<ul style="list-style-type: none"> <li>• Staff objectives will be discussed during the due diligence process.</li> <li>• The appraisal and personal development process will form part of due diligence.</li> <li>• The equality objectives of delivery staff will be discussed and reviewed during monthly CPA meetings.</li> <li>• Where delivery staff do not have an equality objective an action will be set and progress reviewed during CPA meetings.</li> </ul>



Participants		
Criteria	3SC	Subcontractors
How participants will be informed of anti-harassment and anti-bullying policies.	<ul style="list-style-type: none"> <li>• 3SC will establish a portal for subcontractors that will include what information needs to be shared with participants at induction.</li> <li>• Due diligence will require the provision of an anti-harassment and anti-bullying policies.</li> <li>• A specific contract management manual for the GLA/ESF funded Parental Employment project will include information about the requirement to share anti-harassment and anti-bullying policies at induction.</li> <li>• The 3SC Risk and Quality Manager will carry out quality checks of participant records to ensure they sign the required documentation including provision of information about anti-harassment and anti-bullying policies.</li> </ul>	<ul style="list-style-type: none"> <li>• Subcontractors will provide a copy of their anti-harassment and anti-bullying policies.</li> <li>• If subcontractors do not have the required policies 3SC will support them to develop one.</li> <li>• Subcontractors will keep a record of any complaints about bullying and/or harassment and report these to 3SC during monthly CPA meetings.</li> </ul>
How participants will learn about importance of good relations.	<ul style="list-style-type: none"> <li>• ‘Good relations’ is not defined in legislation. For the purpose of this action plan 3SC will adopt the working definition provided by the Equality Commission of <i>“The growth of relationships and structures that acknowledge the religious, political and racial context of society, and that seek to promote respect, equity and trust, and embrace diversity in all its forms.”</i></li> <li>• 3SC will encourage subcontractors to adopt the Equality Commission definition and discuss how</li> </ul>	<ul style="list-style-type: none"> <li>• Subcontractors will actively promote good relations and proactively challenge sectarianism and racism, by reacting swiftly to incidents such as name-calling.</li> <li>• Subcontractors will make it clear to participants that prejudice is not acceptable, by challenging misconceptions, preconceptions, stereotypical assumptions and prejudices.</li> </ul>



	<p>they will proactively encourage and support positive interactions between certain groups of people.</p> <ul style="list-style-type: none"> <li>• 3SC’s contract manual will clarify the need for subcontractors to explain the importance of good relations to participants and that any prejudicial behaviours will not be acceptable.</li> <li>• The promotion of good relations will be discussed during monthly CPA meetings to identify good practice.</li> </ul>	<ul style="list-style-type: none"> <li>• Subcontractors will be expected to create a culture of good relations and recognise the need to promote good relations both within and between communities.</li> </ul>
<b>Performance</b>		
<b>Criteria</b>	<b>3SC</b>	<b>Subcontractors</b>
How the project(s) will monitor its performance in terms of representation of different groups and effectiveness in supporting different groups (results)	<ul style="list-style-type: none"> <li>• The 3SC portal will record equalities information for all participants.</li> <li>• 3SC will run quarterly management reports to identify the representation of different groups who take part in the project.</li> <li>• Monthly quality checks of participant records will include a review of the effectiveness of support provided to different groups.</li> </ul>	<ul style="list-style-type: none"> <li>• Subcontractors will record information to ensure representation of different groups.</li> <li>• Exit surveys will be carried out of all participants to gather their views about the effectiveness of the support provided. Exit surveys will be analysed to identify if there are any issues in the support of different groups.</li> </ul>
Action that the project will take in light of any underperformance	<ul style="list-style-type: none"> <li>• 3SC will carry out monthly CPA meetings with subcontractors to identify any underperformance.</li> <li>• Where underperformance is identified actions will be set to ensure improvements are made.</li> <li>• Where underperformance continues a Performance Improvement Plan will be put into place, including regular monitoring of progress.</li> </ul>	<ul style="list-style-type: none"> <li>• Subcontractors will review performance to ensure no underperformance.</li> <li>• Subcontractors will record information about any issues or any underperformance and discuss with their 3SC Contract Performance Manager.</li> </ul>



	<ul style="list-style-type: none"> <li>Where insufficient progress is made 3SC will consider termination of the contract.</li> </ul>	<ul style="list-style-type: none"> <li>Subcontractors will work with 3SC to resolve any issues of underperformance of any aspect of the Equalities Duty.</li> </ul>
<b>Arrangements for Reviewing the Policy and Implementation Plan</b>		
<b>Criteria</b>	<b>3SC</b>	<b>Subcontractors</b>
The plan should be reviewed on a regular basis and in line with any contractual requirements set by the CFO organisation or Managing Authority.	<ul style="list-style-type: none"> <li>3SC will carry out an annual review of the policy and action plan to ensure contractual requirements continue to be met.</li> <li>Where issues are identified during delivery 3SC will carry out an immediate review of the action plan to identify where improvements are needed.</li> <li>3SC will include a review of the subcontractor's progress with the action plan during quarterly Quality Deep Dives.</li> </ul>	<ul style="list-style-type: none"> <li>Subcontractors will review their progress with the action plan on a quarterly basis.</li> <li>Subcontractors will record and discuss the outcome of their reviews as part of the quarterly Quality Deep Dives (QDDs) of delivery.</li> </ul>
<b>Communication</b>		
<b>Criteria</b>	<b>3SC</b>	<b>Subcontractors</b>
How the policy and plan will be communicated to staff, participants and where necessary, other suppliers.	<ul style="list-style-type: none"> <li>3SC will communicate the policy and plan to its own staff through an email with links to the document.</li> <li>The Head of Employment Programmes will ensure all staff involved in the project have read and understand the policy and plan.</li> <li>3SC will share the policy and plan with the named subcontractors and ask them to sign to show they are aware of and will abide by the policy and plan during delivery of the ESF/GLA funded Parental Employment project.</li> </ul>	<ul style="list-style-type: none"> <li>Subcontractors will share a copy of the policy and plan with delivery staff.</li> <li>Delivery staff will ensure that participants are made aware of the existence of the policy and plan and summarise the contents.</li> <li>Where requested subcontractors will share the policy and plan with participants.</li> </ul>