ARC INITIATIVE

Equality, Diversity and Inclusion Policy

Fair treatment, equal access and a place to belong

Policy detail	Information
Policy owner	Chidi O'Hanekwu
Version	2.0
Approved by trustees	01/09/2026
Last reviewed	September 2026
Next review due	September 2027, or sooner if the law changes
Applies to	Trustees, employees, sessional facilitators, mentors, volunteers, interns, apprentices, agency workers, consultants, partners and everyone who takes part in our programmes

1. Policy statement

Arc Initiative is committed to equality, diversity and inclusion in everything we do. Every person has the right to be treated with dignity, fairness and respect, and to have equal access to opportunity whatever their background or identity.

We are a Black-led and lived-experience-led charity working in East London. We know that inequality is not an abstract idea for the young people we support. It shows up as a job application that never gets a reply, a tenancy that is harder to keep, a school exclusion, a waiting list for mental health support, or an assumption made about someone before they have spoken. Our purpose is to remove barriers, not to describe them.

We are committed to:

- Eliminating unlawful discrimination, harassment and victimisation
- Advancing equality of opportunity
- Fostering good relations between people from different backgrounds
- Taking positive action, where the law allows, to address under-representation and disadvantage

2. Who we serve and why this policy matters

Our programmes are for young people aged 16 to 25 across Newham, Tower Hamlets, Waltham Forest and Barking and Dagenham. Most are from Black, Asian and other minoritised communities and from low income households. A significant number are care leavers or care-experienced, and others are neurodivergent, disabled, young carers, or not in education, employment or training.

This policy therefore has to do more than state good intentions. It has to work for:

- Care leavers and care-experienced young people, who often face barriers that no protected characteristic fully captures

- Young people with caring responsibilities, shift work or unstable housing, who cannot always attend at fixed times or in fixed places
- Disabled and neurodivergent young people, who need adjustments made without having to ask twice
- Young people whose first language is not English, and young people with low literacy or who have missed periods of education
- Young people who have experienced racism, faith-based prejudice or other discrimination, including from services that were meant to help them
- Staff, facilitators, mentors and volunteers, many of whom share the same lived experience as the young people we support

> **Care experience and our approach**
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> Care experience is not a protected characteristic under the Equality Act 2010. Many local authorities have resolved to treat it as though it were, and Arc Initiative does the same. We treat discrimination or disadvantage linked to care experience as seriously as we treat discrimination linked to a protected characteristic, in our recruitment, our programmes and our partnerships.

3. Legal framework

This policy is informed by the Equality Act 2010 and applies to all nine protected characteristics:

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

We also work in line with:

- Human Rights Act 1998
- Worker Protection (Amendment of Equality Act 2010) Act 2023, which introduced the duty on employers to take reasonable steps to prevent sexual harassment of their workers
- Employment Rights Act 2025, which strengthens that duty to all reasonable steps and extends protection against harassment by third parties such as members of the public, partners and contractors, with those provisions taking effect from 30 October 2026
- Equality and Human Rights Commission codes of practice and current guidance
- Data Protection Act 2018 and the UK General Data Protection Regulation, as amended by the Data (Use and Access) Act 2025, which govern how we collect and use equality monitoring information
- Charities Act 2011 and Charities Act 2022, and Charity Commission guidance on trustee duties and on public benefit

- Care Act 2014 and the Children Act 1989 and 2004, where equality and safeguarding meet
- Children's Wellbeing and Schools Act 2026, which extends corporate parenting duties and support for care leavers

4. Scope

This policy applies to:

- Recruitment and selection of staff, trustees, facilitators and volunteers
- Terms and conditions of employment and engagement, pay and progression
- Training, development and supervision
- Volunteer and mentor engagement
- Programme design, delivery and evaluation
- Referral routes and eligibility criteria
- Partnerships, procurement and work with funders
- Our website, publications, social media and events
- Conduct at work and in community settings, and conduct outside work where someone is representing Arc Initiative

5. What we will not tolerate

Behaviour	What it means
Direct discrimination	Treating someone less favourably because of a protected characteristic
Indirect discrimination	A practice that applies to everyone but disadvantages a particular group, and cannot be objectively justified
Harassment	Unwanted behaviour related to a protected characteristic that violates someone's dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment
Sexual harassment	Unwanted conduct of a sexual nature. We take reasonable steps to prevent it, including from third parties such as partners, employers and members of the public
Victimisation	Treating someone badly because they have raised a concern, made a complaint or supported someone else who has
Failure to make reasonable adjustments	Not making changes that would remove a disadvantage for a disabled person
Discrimination by association or perception	Treating someone badly because of someone they are connected to, or because of a characteristic they are assumed to have

We also recognise that unconscious bias, low expectations and institutional practice can disadvantage people even where no one intends harm. We look for that in our own work and change it when we find it.

6. Responsibilities

Who	What they are responsible for
Board of Trustees	Ensuring compliance with the law, reviewing equality data and outcomes at least annually, and reflecting the communities we serve in the make-up of the board
Chief Executive Officer	Leading implementation, allocating resources for training and adjustments, and reporting progress to the board
Managers and programme leads	Designing inclusive programmes, making adjustments, dealing with concerns promptly, and modelling inclusive practice
Staff, facilitators, mentors and volunteers	Treating everyone with dignity and respect, challenging and reporting unacceptable behaviour, completing training, and making adjustments within their control
Partners and contractors	Meeting equivalent standards when delivering with us or on our behalf, which we set out in partnership agreements
Young people and the youth board	Shaping our programmes, telling us where we are getting it wrong, and being supported to do so safely

7. Recruitment and selection

- Roles are advertised widely, including through community networks that reach under-represented groups
- Selection is based on merit against objective criteria, with more than one person involved in shortlisting and interview wherever possible
- Lived experience is valued and recognised as relevant experience, and we welcome applications from care-experienced people and people who have used services like ours
- Recruitment materials use plain, inclusive language and state that adjustments are available
- Reasonable adjustments are offered at every stage, including questions in advance, extra time, alternative formats and a choice of interview format
- We ask only for the information we need, and equality monitoring is separated from selection decisions
- Criminal record disclosures are handled fairly, in line with our safeguarding policies and the law on filtered and protected convictions, and a disclosure does not automatically exclude someone
- Where the law allows, we take positive action to address under-representation, including targeted outreach, encouragement to apply, and choosing between equally qualified candidates

8. Inclusive delivery and access

We remove practical barriers rather than expecting young people to overcome them.

- Our programmes are free at the point of access
- We cover travel and food costs where cost would otherwise stop someone taking part
- We deliver online and in person, so that caring responsibilities, shift work, unstable housing or distance do not exclude anyone

- We work around exam periods and school holidays rather than through them, and offer wellbeing drop-ins at those times
- Sessions are designed so that a young person who does not want to speak in a group can do the same work one to one
- We provide materials in accessible formats on request, and we use plain English
- We take taster sessions into places young people already trust rather than expecting them to come to an unfamiliar building
- Venues are checked for physical accessibility, including step-free access and accessible toilets, and we tell people what to expect before they arrive
- We ask about access and support needs when someone joins, we ask again as things change, and we act on what we are told
- We co-design programmes with young people and pay attention to what alumni and the youth board tell us

Digital accessibility

- We work towards the Web Content Accessibility Guidelines, version 2.2, at level AA for our website and online materials
- We use readable fonts, sufficient colour contrast, descriptive link text and alternative text for images
- We caption or provide transcripts for video content wherever we can
- We check that online session platforms work with assistive technology and that participants can join by telephone where needed
- Anyone can tell us about an accessibility problem with our website or materials, and we will respond and fix it where we can

9. Training and culture

- Equality, diversity and inclusion is covered at induction for everyone, including trustees
- Refresher training is provided at least every two years, and includes bias, inclusive practice, anti-racist practice and preventing harassment
- Managers receive additional guidance on adjustments, inclusive recruitment and handling concerns
- We talk about equality in supervision and team meetings, not only in training sessions
- We name specific experiences rather than generalising. A care-experienced young Black man's experience of a job interview, a landlord or a police stop is not the same as another young person's, and we say so in our sessions

10. Preventing harassment

Arc Initiative takes all reasonable steps to prevent harassment, including sexual harassment, of our workers and volunteers, and to protect the young people we support. We:

- Set clear standards of behaviour in our code of conduct for staff, volunteers, mentors and partners
- Assess the risk of harassment in our activities, including at events, on placements and in workplaces we send young people into, and act on what we find

- Brief employers, mentors and partners on the standards we expect before a young person is placed with them
- Provide more than one route to report, including a route that does not go through the person's own line manager
- Take every report seriously, act promptly, and never treat a report as a reason to withdraw an opportunity from the person who raised it
- Record reports and review them so that we can see patterns rather than isolated incidents

11. Safeguarding, wellbeing and equality

Equality and safeguarding are connected. Racism, faith-based prejudice, disablist abuse and other prejudice-based harm are safeguarding matters, and we treat them as such. Current statutory guidance on safeguarding children places a stronger emphasis on identifying, understanding and challenging racism and discrimination, and our practice reflects that.

- Prejudice-based incidents are recorded and reported through our safeguarding procedures as well as this policy
- We are alert to the ways discrimination increases risk, including in housing, employment and contact with the police
- We make sure that adjustments do not reduce protection, and that protection does not become a reason to exclude someone from an opportunity

12. Raising a concern

- Anyone can raise a concern about discrimination, harassment or exclusion, including young people, parents and carers, referrers, staff, volunteers and partners
- Concerns can be raised with any member of staff, with the Chief Executive Officer, or with the Chair of Trustees where that is more appropriate
- We will acknowledge a concern promptly, agree with the person what they want to happen wherever possible, and deal with it fairly and confidentially
- Informal resolution is offered where the person wants it, and formal procedures are available under our Complaints, Disciplinary and Grievance procedures
- Serious breaches may result in disciplinary action, the ending of a volunteer or mentor role, or the ending of a partnership agreement
- No one will be treated unfairly for raising a genuine concern. Anyone who is can raise that as victimisation
- Where a concern involves potential harm to a child or adult at risk, our safeguarding policies apply and take priority

13. Monitoring, data and measurement

We collect equality information so that we can see who we are reaching, who we are missing, and whether our programmes work equally well for everyone.

- We collect and analyse diversity data across young people, staff, volunteers and trustees, where it is appropriate and lawful to do so
- Monitoring questions are optional, and choosing not to answer never affects someone's access to a programme or a role
- Equality information is handled in line with our Privacy and Data Protection Policy. Most of it is special category data, so we identify a lawful basis and an additional condition before we collect it, and we anonymise or aggregate wherever we can
- We monitor participation, completion and outcomes by group, not only overall numbers

- We use surveys, focus groups, end-of-programme circles and feedback from partners to understand experience as well as numbers
- We report to trustees at least annually, and we act on what the data shows
- We acknowledge openly that our data on who we reach is better than our data on who we are missing, and improving that is a current priority

14. Partnerships, employers and funders

- We choose partners who share this commitment, and we set out expectations in writing in partnership agreements
- We brief employers hosting placements on inclusive practice and on our expectations about harassment and adjustments
- We ask employers and partners to tell us about any incident involving a young person we have placed with them, and we follow up with the young person
- We will end a partnership where a partner will not meet these standards
- We report honestly to funders about who our work reaches, including where we have fallen short

15. Review and approval

This policy is reviewed every year by the Board of Trustees, and sooner if the law changes. The review includes equality data, concerns raised during the year, and feedback from young people, staff, volunteers and partners.

Version	Date	Summary of changes
2.0	September 2026	Added the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025 harassment duties, the treatment of care experience, a section on who we serve, digital and physical accessibility, reasonable adjustments, positive action, the lawful basis for equality monitoring, preventing harassment including by third parties, partnership and employer expectations, and clearer reporting routes
1.0	January 2026	Original policy

Signed on behalf of the Board of Trustees
Stephanie Nicola

Name and role
Stephanie Nicola

Date
01/09/2026