1. Introduction

1.1. Policy Purpose

At DCC, we are committed to creating an environment where diversity is valued, respected and included, where colleagues can share their different perspectives and bring their whole selves to work. Without this, DCC risks a less effective, less representative workforce, poorer decision-making, and failure to meet its legal duties under the Equality Act 2010.

This policy sets out DCC's commitments on diversity, equity and inclusion (DEI), what colleagues can expect from DCC, and what DCC expects from colleagues, suppliers and partners.

2. Policy Statement

DCC is committed to:

- creating a workforce that reflects the diversity of our communities, recognising that differences in skills, education, experience, background, age, gender, race, ethnicity, nationality, disability, religion or belief, sexual orientation and other characteristics drive greater effectiveness through diversity of thought
- creating an inclusive and welcoming work environment free of harassment and bullying, where everyone can achieve their potential and feels, and is, valued and respected
- acting in accordance with DCC's purpose, values and behaviours and its Code of Conduct, which set out the inclusive behaviours expected of everyone working for or on behalf of DCC
- working with suppliers and partners who share DCC's commitment to diversity and an inclusive workplace that respects the human rights of all employees
- applying this approach to client, customer and stakeholder relationships, so that no one DCC serves or works with feels discriminated against
- ensuring a safe and secure environment for all stakeholders to work and conduct business
- addressing any instances of inappropriate or unacceptable behaviour, such as harassment, bullying, discrimination or victimisation, and encouraging everyone to Speak Up about any concerns
- incorporating DCC's zero-tolerance commitment to discrimination and abuse across its policies and processes, including the Anti-Racism, Discrimination, Harassment and Bullying Policy, Safeguarding Policy, HSE Policy, Supplier Code of Conduct, Speak Up Policy and Grievance Procedure

3. Scope

This policy applies to all DCC employees, workers and contractors across Brabazon House (Manchester) and Riverscape (London), and extends to DCC's relationships with suppliers, partners, customers and other stakeholders

3.1. Out of Scope

Detailed reporting procedures for discrimination, harassment and bullying are set out in the Anti-Racism, Discrimination, Harassment and Bullying Policy, and safeguarding concerns involving a Child or Adult at Risk are covered by the Safeguarding Policy.

4. RACI

Responsible	Accountable	Consulted	Informed
People Team	People Director	Employee Network Groups, HSE, Legal	ExCo, Board, Employees, Suppliers and Partners

5. Principles

5.1. What you should expect from DCC

- DCC will treat you with dignity and respect, regardless of any personal characteristic, and in accordance with the law
- DCC will support all colleagues, and those working on its behalf, to uphold its commitments on diversity, equity and inclusion
- DCC will provide guidance, training and support to help colleagues deliver these commitments where appropriate
- DCC will consider and implement reasonable adjustments where required to support colleagues, job applicants and others working on DCC's behalf, in accordance with legal requirements and business needs.

5.2. What DCC expects from you

- treat everyone fairly, embracing differences and creating an inclusive working environment in your workplace and the wider communities in which DCC operates
- complete all training that applies to you and your role
- speak up if you are unsure what to do, or if you have a concern that this policy, or any related policy, is not being followed, or that something is illegal, unethical or does not comply with DCC's values, behaviours and Code of Conduct
- use the Speak Up process to anonymously report activity that does not meet DCC's values, no action will be taken against you for raising a genuine concern, whether or not it is proven. If any claims are found to be vexatious, they will be investigated and potential outcomes could lead to disciplinary action.

5.3. Manager Responsibilities

Managers play a key role in creating and maintaining an inclusive working environment. Managers are responsible for:

- leading by example and demonstrating behaviours consistent with DCC's Values, Code of Conduct and DEI commitments;

- fostering a workplace culture where colleagues are treated fairly, respectfully and inclusively;
- ensuring recruitment, development, promotion and reward decisions are made objectively and without discrimination;
- supporting reasonable adjustments and removing barriers that may prevent individuals from participating fully in the workplace;
- challenging inappropriate behaviour and addressing concerns promptly and fairly;
- encouraging colleagues to raise concerns and ensuring concerns are escalated appropriately where required;
- supporting employee participation in diversity, wellbeing and employee network initiatives; and
- completing any training relevant to their role and implementing actions that support DCC's diversity, equity and inclusion objectives.

5.4. How DCC will achieve this

- embed DEI activities and objectives within DCC's people strategy and action plans
- regularly review and update employment practices to maintain a focus on diversity, equity and inclusion
- ensure the principles of this policy are reflected in DCC's standard terms and conditions of employment
- improve data management and disclosure to identify areas for improvement in workforce representation
- operate a zero-tolerance approach to all forms of abuse, racism, discrimination, harassment and bullying, with a clear procedure to follow for any reported acts or behaviour
- set and periodically review diversity representation ambitions appropriate to DCC's workforce, with progress reported to the Executive Team
- educate colleagues and raise awareness of discrimination in the workplace through mandatory Diversity & Inclusion training and supporting modules
- support Employee Network Groups to create safe, collaborative spaces for colleagues to connect and share lived experience, open to all colleagues for awareness and learning
- ensure members of the Executive Team continue to act as sponsors for specific diversity and wellbeing strands and employee networks
- ensure recruitment, selection, promotion, development and reward decisions are based on merit, objective criteria and business need, free from unlawful discrimination and bias;
- seek to remove barriers that may disadvantage individuals or groups and support equitable access to opportunities wherever reasonably practicable.

5.5. Governance

The Board and Executive Committee will:

- ensure new appointments are made on merit, taking account of the specific skills, experience, independence and knowledge needed
- take opportunities to increase the diversity of the Board and senior leadership, where appropriate
- monitor progress against DCC's diversity, equity, inclusion and wellbeing plans, including the internal talent pipeline for succession
- receive regular reporting on DCC's progress in creating an inclusive and equitable workplace, including relevant diversity metrics and progress against stated objectives

6. Exceptions

There are no current exceptions to this policy. Any request for an exception must be submitted in writing to the HR Director and formally approved and documented before being applied.

7. Compliance Monitoring

The People Team monitors compliance with this policy, reviewing workforce diversity data, training completion and Employee Relations case data at least quarterly, with findings reported to ExCo.

Policy effectiveness may also be assessed through:

- recruitment, promotion and retention data;
- employee engagement survey results;
- participation in Employee Network Groups;
- diversity representation trends; and
- themes arising from Speak Up reports.

Non-compliance with this policy, including discriminatory behaviour or a failure to act on a reported concern may result in disciplinary action up to and including dismissal for gross misconduct.

Findings, trends, lessons learned and areas for improvement will be reviewed periodically and used to inform DCC's diversity, equity and inclusion objectives, training programmes and people initiatives.

8. Communication

This policy is communicated by the People Team through induction, DCC's intranet (SmartNET), and manager briefings. Any changes to the policy will be communicated to all DCC staff, and the policy will be reviewed at least every year or sooner if legislation changes.

9. Definitions

Term	Description
Diversity	The presence of difference within a group, including characteristics such as age, disability, race, sex and religion or belief.

Equity	Fair treatment, access and opportunity for all, recognising that people start from different circumstances.
Inclusion	Creating an environment in which everyone feels valued, respected and able to contribute fully.
Protected characteristic	A characteristic protected under the Equality Act 2010, such as age, disability, race, sex or religion.
Positive action	Lawful, proportionate steps taken to overcome a disadvantage linked to a protected characteristic.

10. Policy Responsible Person

For any queries related to this policy, please contact the designated policy author listed in the Policy Hub, who is best placed to provide clarification or additional guidance.

Related Documents

All related documents can be found on the People Team SmartNET and/or the Policy Hub.

- Anti-Racism, Discrimination, Harassment and Bullying Policy
- Safeguarding Policy
- Whistleblowing Policy
- Grievance Procedure
- Code of Conduct

Appendices

Appendix A – Legislative Reference

- Equality Act 2010
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Human Rights Act 1998