



OFFICE OF THE POLICE & CRIME COMMISSIONER
Equality, Diversity & Inclusion Policy

SECTION		PAGE
1	Purpose.	1
2	Scope.	1
3	Legal Framework.	1
4	Public Sector Equality Duty.	3
5	Equality, Diversity & Inclusion.	3
6	Disability, Neurodiversity and Long-Term Conditions.	4
7	Preventing Discrimination, Harassment and Victimisation.	4
8	Intersectionality & Lived Experience.	5
9	Recruitment & Employment Development.	5
10	Roles & Responsibilities.	5
11	Raising Concerns and Support.	6
12	Monitoring and Review.	6
13	Breaches.	6

1. Purpose

- 1.1 The Office of the Police and Crime Commissioner (OPCC) is committed to creating and maintaining a working environment in which everyone is treated with dignity, fairness and respect. See appendix 1 for the OPCCs EDI statement.
- 1.2 The OPCC value diversity, promote equality of opportunity and are committed to building an inclusive culture where difference is recognised as a strength. We will not tolerate discrimination, harassment, bullying or victimisation in any form.
- 1.3 This policy sets out the OPCC's approach to equality, diversity and inclusion (EDI).
- 1.4 This policy does not form part of any contract of employment, and we may amend it at any time.

2. Scope

- 2.1 This policy applied to:
 - All OPCC employees, whether permanent, fixed-term, part-time or temporary

- Agency staff, contractors, consultants and volunteers working on behalf of the OPCC
- Work-related activities, including recruitment, training, meetings, events and external engagements

3. Legal Framework

1.1 Equality Act 2010

1.2 The Equality Act 2010 provides protection against unlawful discrimination, harassment and victimisation based on the following protected characteristics:

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

Unlawful conduct covered by the Act includes:

- Direct discrimination
- Indirect discrimination
- Harassment
- Victimisation
- Discrimination by association or perception

Direct discrimination: treating someone less favourably because of a protected characteristic compared to someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled and you think they "wouldn't fit in" to the team).

Indirect discrimination: a policy, procedure or way of working that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

Associative discrimination: Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.

Discrimination by perception: Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example

choosing not to promote someone because you mistakenly perceive them to be gay.

Discrimination arising from disability: Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified, for example dismissing someone because of their disability-related absence.

Failing to make reasonable adjustments: Employers are legal obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. For example changing their working hours or place of work.

Harassment and sexual harassment: harassment, sexual harassment and other unwanted conduct related to a protected characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Less favourable treatment related to sex or gender reassignment that occurs because of a rejection or submission to sexual conduct.

Victimisation: retaliation or treating someone detrimentally because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

Bullying: There is no legal definition of bullying. However, it is regarded as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient. Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work. If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see harassment).

4. Public Sector Equality Duty

- 4.1 As a public authority, the OPCC is subject to the Public Sector Equality Duty under section 149 of the Equality Act 2010.
- 4.2 In exercising all its functions, the OPCC has due regard to the need to:
 1. Eliminate unlawful discrimination, harassment and victimisation
 2. Advance equality of opportunity between people who share a protected characteristic and those who do not
 3. Foster good relations between different groups
- 4.3 The OPCC meets this duty by:
 - Considering equality impacts in decision-making, policy development and commissioning
 - Undertaking Equality Impact Assessments (EIAs) where appropriate and proportionate
 - Using workforce and service-user data to identify and address inequality
 - Monitoring outcomes and taking remedial action where required

5. Equality, Diversity and Inclusion

Equality

Equality is about ensuring that people are treated fairly and are not disadvantaged by unlawful discrimination.

Diversity

Diversity recognises and values individual differences, including background, experience, perspective and identity.

Inclusion

Inclusion means creating an environment where people feel respected, safe, supported and able to contribute fully.

6. Disability, Neurodiversity and Long-Term Conditions

- 6.1 Disability under the Equality Act includes physical, sensory, learning and mental impairments which have a substantial and long-term effect on normal day to day activities.

This includes, but is not limited to:

- 1.3 Long-term physical or mental health conditions

- Neurodiverse conditions such as autism spectrum conditions, ADHD and dyslexia
- Conditions that may not be immediately visible

- 6.2 The OPCC is committed to:

- Creating an environment that encourages disclosure without fear of disadvantage
- Considering and implementing reasonable adjustments to remove barriers
- Supporting individuals to participate fully and perform their role effectively

7. Preventing Discrimination, Harassment and Victimisation

- 7.1 The OPCC takes a proactive and preventative approach to eliminating discrimination, harassment and victimisation.

Unacceptable behaviour will not be tolerated, including:

- Sexual harassment
- Harassment
- Bullying or intimidation
- Offensive language, behaviour or imagery

- Unwanted conduct that violates dignity or creates a hostile or degrading environment

Prevention includes:

- Clear behavioural expectations
- Training and awareness-raising
- Leadership role-modelling inclusive behaviour
- Encouraging early reporting and challenge of inappropriate conduct

All employees are expected to contribute to a respectful and inclusive workplace.

Sexual Harassment Prevention Responsibilities

Managers must:

- Identify risks
- Monitor workplace culture
- Address inappropriate behaviour immediately

Third-Party Conduct Standards

Include expectations for visitors and partners.

8. Intersectionality and Lived Experience

- 8.1 The OPCC recognises that individuals may experience multiple and overlapping forms of disadvantage due to a combination of protected characteristics or personal circumstances.
- 8.2 Decision making, policy development and workforce initiatives will consider intersectional impacts to avoid unintended disadvantage and to promote inclusive outcomes.
- 8.3 Lived experience and staff engagement will be used, where appropriate, to inform inclusive practice and continuous improvement.

9. Recruitment, Employment and Development

- 9.1 Equality, diversity and inclusion principles apply throughout the employment lifecycle, including:
 - Recruitment and selection
 - Induction and probation
 - Pay, grading and progression
 - Training and development
 - Flexible working

- Performance management
- Leaving employment

9.2 Decisions will be fair, transparent and based on objective criteria.

10. Roles and Responsibilities

Police and Crime Commissioner

Provides visible leadership and sets the strategic direction for equality and inclusion.

Chief Executive

Has overall accountability for implementation of this policy and compliance with equality legislation.

Senior Leaders and Managers

Are responsible for embedding inclusive practices, addressing inappropriate behaviour promptly and ensuring fair decision-making.

Employees

Are responsible for treating others with dignity and respect and for upholding the values set out in this policy.

11. Raising Concerns and Support

- 11.1 Employees who experience or witness behaviour contrary to this policy are encouraged to raise concerns at the earliest opportunity.
- 11.2 Concerns will be treated seriously, fairly and confidentially in line with OPCC procedures. No individual will be subjected to victimisation for raising a concern in good faith.
- 11.3 Support and guidance are available through HR and internal policies.

12. Monitoring and Review

12.1 The OPCC will monitor the effectiveness of this policy through:

- Workforce data and analysis
- Feedback and engagement mechanisms
- Review of complaints, grievances and outcomes

- 12.2 This policy will be reviewed at least every three years, or sooner if required due to legislative change or organisational need.

12.3 Harassment Data Monitoring

Commitment to monitor:

- Complaints
- Trends
- Hotspots
- Protected characteristics

13. Breaches of this policy

- 13.1 We take a strict approach to breaches of this Policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal without notice. Employees who believe that they have suffered any form of discrimination, harassment or victimisation are entitled to raise the matter through the Grievance Procedure or the Bullying and Harassment Policy, as appropriate. All complaints of discrimination will as far as possible be dealt with seriously, promptly and confidentially.
- 13.2 Staff must not be victimised or retaliated against for complaining about discrimination. Making false allegations deliberately and in bad faith will be treated as misconduct and dealt with under Disciplinary Procedures.

Policy Statement Information	
Policy Owner (Job Title)	Chief Executive
Date to be Reviewed	September 2028
Date Last Reviewed Completed	September 2026
Effective Commencement Date	May 2015
Equality Impact Assessment completed	September 2026
Confirm whether this policy can be shared on OPCC public facing website to ensure compliance with Specified Information Order.	Yes
Data Protection Impact considerations	Considered and compliant with UK GDPR and Data Protection Act 2018

Appendix 1

Equality, Diversity and Inclusion (EDI) Statement

The Office of the Police and Crime Commissioner (OPCC) is committed to promoting equality, diversity and inclusion in all aspects of its work. We aim to create an environment where all individuals are treated with dignity and respect, and where differences are valued.

We will take all reasonable steps to ensure that no individual or group is unfairly disadvantaged, and we will challenge discrimination wherever it occurs. We are committed to ensuring equal access to our services, employment, training, development and promotion opportunities.

Our Commitments

Age

We will:

- Treat people of all ages with respect and dignity
- Ensure equal access to employment, training, development and promotion opportunities
- Challenge age-related stereotypes and discriminatory assumptions

Disability

We will:

- Make reasonable adjustments to remove barriers and support disabled people in accessing our services and employment opportunities
- Work with individuals to identify appropriate support where needed
- Challenge discriminatory assumptions about disability
- Continually improve access to information, including through alternative formats and communication support where appropriate
- Keep our premises under review and take reasonable steps to improve accessibility where required

Race

We will:

- Challenge racism and racial discrimination wherever it occurs
- Respond promptly and appropriately to incidents of racism
- Promote race equality and inclusion across the OPCC

- Take lawful positive action where appropriate to address disadvantage
 - Ensure fair access to services, employment, training and opportunities
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Sex (Gender) and Gender Reassignment

We will:

- Challenge discrimination and assumptions based on sex or gender
 - Support individuals who are undergoing, have undergone, or are proposing to undergo gender reassignment
 - Promote equality of opportunity and fair treatment in all aspects of employment
 - Take lawful positive action where appropriate to address inequality
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Sexual Orientation

We will:

- Promote an inclusive environment that recognises and supports LGBTQ+ people
 - Challenge discriminatory assumptions and behaviours
 - Promote positive representation and inclusion
 - Ensure fair and equal access to services, employment and opportunities
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Religion or Belief

We will:

- Respect and, where reasonably practicable, accommodate religious beliefs and observances
 - Ensure that individuals are not disadvantaged because of their religion or belief
 - Maintain a balance where the expression of beliefs does not infringe on the rights and dignity of others
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Pregnancy and Maternity

We will:

- Treat individuals with dignity and respect during pregnancy and maternity
 - Ensure that no one is disadvantaged as a result of pregnancy or maternity leave
 - Take appropriate steps to support individuals' health, wellbeing and work needs
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Marriage and Civil Partnership

We will:

- Treat individuals with respect regardless of marriage or civil partnership status
 - Ensure that no individual is disadvantaged because of their status
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Part-time and Fixed-term Workers

We will:

- Ensure that part-time and fixed-term employees are treated no less favourably than comparable full-time or permanent employees
 - Apply terms and conditions on a pro rata basis where appropriate, unless different treatment can be objectively justified
-

Equal Pay

We are committed to equal pay and will:

- Ensure that employees receive equal pay and contractual benefits for the same work, work rated as equivalent, or work of equal value
 - Operate fair and transparent pay structures, supported where appropriate by job evaluation processes
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Implementation

These commitments are supported by our policies and procedures, including recruitment, training, performance management, and complaints processes. All employees, managers and partners share responsibility for upholding these standards.