# Equality, Diversity and Inclusion Policy

## 1. Introduction

WAY Widowed and Young is dedicated to encouraging a supportive and inclusive culture in which differing ideas, abilities, backgrounds and needs are fostered and valued and where those with diverse experiences feel welcome and are able to participate and contribute.

Our membership is diverse, united by the shared experience of being widowed young, and we recognise that people with different backgrounds, skills, experiences and attitudes can offer new ideas and perceptions. We aim to encourage and harness these differences throughout our organisation to ensure our services are inclusive, relevant and meet the needs of our growing membership. It is within our best interest to promote diversity and equality within our charity and recognise that this will enhance our effectiveness in carrying out our work.

We will foster a supportive and inclusive culture for our members, volunteers, staff and other stakeholders. WAY Widowed and Young recognises that this is an ever-evolving requirement.

## 2. Statement of Commitments.

**This policy sets out our commitment to:**

2.1 Promote an environment that is free from discrimination and prejudice.
2.2 Ensure that we're as inclusive as possible in all areas of our work and operations, whether that's providing services for those widowed young, raising awareness, or as an employer.
2.3 Comply with UK equalities legislation and our other external obligations including: equality standards set by contracts, regulatory requirements, accreditations and good practice schemes.
2.4 Create an environment that promotes dignity and respect to all. No form of intimidation, bullying, harassment (including sexual harassment) or victimisation will be tolerated, whoever it comes from. This includes harassment of our staff and volunteers by members, partners or other third parties (see WAY's Bullying and Harassment Policy).
2.5 Provide opportunities for WAY members to be involved in the design and implementation of services.
2.6 Ensure opportunities to represent the organisation publicly are member led and representative of diverse communities.
2.7 Promote equality in the workplace and regularly review all our employment practices and procedures so that fairness is always maintained.
2.8 Encourage anyone who feels they have been subject to discrimination to raise their concerns so we can apply corrective measures.
2.9 Make our staff and volunteers aware of their responsibilities and know how and where to seek support to actively uphold and champion equality, diversity, and inclusion. See sections 4 and 7 for further details.
2.10 Collect diversity-related data on a voluntary, confidential and lawful basis to better understand our members, volunteers, staff, trustees and audiences (see section 6).
2.11 Actively promote our services and opportunities to a wide range of diverse communities from all backgrounds to ensure we are able to reach as many people as we reasonably can who are widowed and young and to ensure that those eligible from diverse communities know that the charity is for all and that they will be made welcome.

2.12 Take all reasonable steps to prevent sexual harassment of our staff (and, as a matter of good practice, our volunteers), and to prevent our staff being harassed by third parties such as members, venues, suppliers and partners (see 3.8).
2.13 Work towards a Board of Trustees that reflects, as far as possible, the diversity of the community we serve, through open and inclusive trustee recruitment.
2.14 Monitor and review this policy annually, and report on progress to the Board of Trustees.

**This policy applies to:**

> our trustees, staff (including job applicants, workers and freelancers) and volunteers
> our members and anyone using our services or attending our events, online or in person
> third-party providers, contractors and partners working with or on behalf of WAY, who will be expected to follow this policy through our agreements with them.

Our intention is to ensure that no member, user of our services, volunteer, trustee, job applicant or employee receives less favourable treatment due to a protected characteristic (i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation), spent or unrelated criminal convictions, or membership or non-membership of a trade union. All trustees, employees and volunteers have a responsibility to co-operate with measures to ensure equal opportunity and non-discrimination.
Marriage and civil partnership is protected by law in employment only. We choose to extend the same commitment to our members and service users.
**Age-based eligibility.** Membership of WAY is open to people who were widowed at or below the age set out in our membership criteria. This reflects our charitable purposes and is permitted by section 193 of the Equality Act 2010, which allows a charity acting in line with its governing document to restrict its benefits to people who share a protected characteristic, where this is a proportionate means of achieving a legitimate aim or is to prevent or compensate for a disadvantage linked to that characteristic. Supporting people widowed at a young age addresses the particular disadvantages they face, and is a proportionate means of achieving our charitable aims. We will review this whenever our membership criteria change.
**Single-sex and separate-sex activities.** Our groups, events and services are open to all eligible members by default. We will only run an activity for one sex (for example a peer support group, or shared accommodation at a residential event) where one of the conditions for single-sex provision in the Equality Act 2010 is met (Schedule 3 for services, or Schedule 16 for members-only activities of an association) and doing so is a proportionate means of achieving a legitimate aim, in line with the Act as interpreted by the Supreme Court in *For Women Scotland Ltd v The Scottish Ministers* (2025) and the EHRC Code of Practice for Services, Public Functions and Associations (2026). Before doing so we will consider the impact on trans members and members with other protected characteristics, provide inclusive alternatives wherever possible, and take legal advice. Everyone will be treated with dignity and respect.

We recognise our responsibilities under the Equality Act 2010. We are passionate about meeting these responsibilities and going further to ensure that equality and diversity is truly embedded in all that we do. We have a voluntary Modern Slavery Statement and will not knowingly support or deal with any business involved in slavery or human trafficking.

## 3 Our Standards

3.1 No unlawful discrimination shall occur in the support and management of our staff and delivery of our services, and all decisions shall be objective and fair with individual circumstances taken into account.

3.2 Our services will take a person-centred approach, and diversity considerations will be incorporated into processes and delivery to ensure that all our services are accessible to all eligible members; we prevent discrimination and we protect the dignity of our members. As a service provider we will anticipate the needs of disabled members, for example in our choice of venues, online platforms, communications and event formats.

3.3 We expect all our staff and volunteers will use appropriately inclusive language and behave in a way that will uphold the dignity of members, colleagues and stakeholders.

3.4 We commit to providing and supporting channels for our members to have their voices heard. This includes opportunities to network with one another, and feedback to organisational proposals. For example, our Diversity Working Group, which will have agreed terms of reference and report to the Chief Executive.

3.5 We will ensure that recruitment, selection and promotion are transparent, merit-based and fair. We will offer reasonable adjustments at every stage of recruitment, may use positive action where a group is under-represented (see Appendix 1), and will treat criminal records fairly and in line with the Rehabilitation of Offenders Act 1974. We commit to providing training on equal opportunities and unconscious bias, to support these objectives.

3.6 We will make reasonable adjustments for disabled job applicants, staff and members, as the law requires, and where reasonable we will make tailored adjustments to meet the needs of our volunteers and others.

3.7 Create a working environment that values difference and is free from unlawful discrimination, victimisation, bullying or harassment. Any individual who experiences or witnesses discrimination / harassment is encouraged to report it, and will be protected from victimisation for doing so. All complaints will be taken seriously, promptly and thoroughly investigated, and dealt with in a sensitive and effective manner.

Further details are set out in our Bullying and Harassment Policy and Grievance Policy.

3.8 **Preventing sexual harassment and harassment by third parties.** We will take all reasonable steps, as the law requires, to prevent sexual harassment of our staff and to prevent our staff being harassed by third parties such as members, event venues, suppliers and partners. This includes: carrying out and regularly reviewing a harassment risk assessment covering events, residential weekends, online groups and lone working; making clear in our Membership Code of Conduct and partner agreements that harassment will not be tolerated; providing clear and confidential reporting routes for staff, volunteers and members; training staff and lead volunteers; and acting promptly on any concern, which may include restricting or removing a member's access to WAY services in line with our Membership Policy. As a matter of good practice, we will apply the same standards to protect our volunteers.

3.9 The portrayal of under-represented groups within our campaigns and materials should be balanced, and not reinforce stereotypes.

3.10 We will maintain clear policies in place to ensure that fundraising practices do not put pressure on, or take advantage of people in vulnerable circumstances. We recognise that bereavement can itself place people in vulnerable circumstances. We will follow the Fundraising Regulator's Code of Fundraising Practice and consider each supporter's individual circumstances, rather than making assumptions based on any characteristic.

## 4. Responsibilities

4.1 The **Board of Trustees** are responsible for championing equality, diversity and inclusion and ensuring that the policy is consistent with the fundamental principles and that resources, support and leadership is provided to ensure this policy can be meaningfully implemented. The Board will also review its own skills and diversity regularly, recruit trustees openly and inclusively, and receive an annual EDI report.

4.2 A nominated **Trustee EDI Champion** will provide board-level oversight of this policy and the EDI action plan, and act as a point of contact for the Diversity Working Group.

4.3 The **Chief Executive** is the policy owner and is responsible for ensuring that this policy is fit for purpose and up to date, that it is reviewed annually, and that an annual EDI report and action plan are presented to the Board.

4.4 **Line managers** are responsible for applying this policy fairly when recruiting, managing and developing staff and volunteers, making reasonable adjustments, and dealing promptly with any concerns raised with them.

4.5 **WAY Operations Team** are responsible for implementing the policy and role modelling inclusive behaviour and providing support to members and volunteers

4.6 Our **members and volunteers** are responsible for championing equality, diversity and inclusion, understanding how the policy relates to their role, and reporting cases of discrimination, harassment, and unfair treatment.

4.7 **All staff** are responsible for following this policy, completing required training, treating others with dignity and respect, and reporting discrimination, harassment or unfair treatment.

## 5 Laws and regulations

5.1 This policy supports our compliance with the requirements of relevant UK legislation including the *Equality Act 2010* and the *Modern Slavery Act 2015.*

5.2 We will also comply with related legislation and guidance, including the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025 (duties to prevent sexual harassment and harassment by third parties), UK GDPR and the Data Protection Act 2018, the Rehabilitation of Offenders Act 1974, and the relevant Equality and Human Rights Commission Codes of Practice.

5.3 Where we have staff, volunteers or members in Northern Ireland, we will comply with the equivalent Northern Ireland legislation, including the Fair Employment and Treatment (Northern Ireland) Order 1998. The duties to prevent sexual harassment and third-party harassment described in 3.8 do not currently apply in Northern Ireland, but WAY will apply the same standards there.

## 6 Monitoring and compliance

6.1 Diversity-related data about staff, volunteers, trustees, members and complaints will be collected and monitored to ensure our policy and strategies are working effectively in practice and inform their development.

6.2 Providing diversity information is always voluntary, and every question will include a 'prefer not to say' option. Some of this information (ethnicity, religion or belief, health including disability, and sexual orientation) is special category data under UK GDPR. We will process diversity data on the basis of our legitimate interests in monitoring equality and, for special category data, under the equality of opportunity or treatment condition in the Data Protection Act 2018, supported by an Appropriate Policy Document. It will never be used to make decisions about an individual, and we will stop processing someone's data if they ask us to in writing. We will keep it confidential and separate from membership and personnel records, and report it only in anonymised, aggregate form so that no individual can be identified. See our Data Protection Policy.

6.3 Diversity-related actions and targets within the charity strategy plan will be monitored and reported on.

6.4 We will undertake regular surveys in order to collect the views of our people, including seeking feedback from our people in relation to diversity. This survey will enable analysis by demographic.

## 7 Training and support

7.1 All staff will complete mandatory EDI and anti-harassment training at induction to help them to translate the requirements of this policy into practice.

7.2 Volunteers Area Contacts (such as group organisers and online moderators) will be recommededn to complete EDI and anti-harassment training as part of their induction. All other volunteers will be encouraged to attend training and will have access to a range of resources.

7.3 Trustees will receive EDI and anti-harassment training as part of their induction.

Other relevant WAY policies

The following policies of WAY Widowed and Young should be read alongside this policy:

(a) Complaints Policy
(b) Bullying and Harassment Policy
(c) Membership Policy Inc. Code of conduct
(d) Data protection policy
(e) Privacy Policy
(f) Confidentiality Policy
(g) Grievance Policy
(h) Disciplinary Policy

(i) Whistleblowing Policy
(j) Safeguarding Policy
(k) Recruitment Policy
(l) Volunteer Policy
(m) Modern Slavery Statement

## Changes to this policy

This policy will be reviewed annually, or sooner if there are changes in legislation or guidance. Amendments must be approved by the Board of Trustees and will apply from the date of approval. The current version will be published on our website.

## Our Contact Details

WAY Widowed and Young,
Advantage House
Stowe Court,
Stowe Street,
Lichfield. WS13 6AQ

enquiries@widowedandyoung.org.uk

## Policy Control

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Version** | 3 | Issue Date MM/YY | 06/20 | Last Review Date MM/YY | 11/26 | Next Review Date MM/YY | 11/27 |
| **Signed (Chair or Trustee)** | Agreed by WAY Board of Trustees, Meeting Date 24the October 2026 | | | | | | |

****END OF POLICY***

\

## Appendix 1: definitions

### What we mean by Equality, diversity and inclusion

**Equality:** ensuring people are not treated less favourably without justification, in particular on the basis of one or more protected characteristics[1] defined by the *Equality Act 2010 and* other anti-discrimination legislation.

**Equity:** recognising that people start from different places and may need different support or adjustments to have the same opportunity to take part and benefit. The Charity Governance Code (2025) uses the term 'equity, diversity and inclusion'.

**Diversity:** recognising and valuing the benefits of different perspectives, backgrounds and experiences. Also, identifying and acknowledging under-representation, and taking active steps to address it through: initiatives, policies, and systemic change.

**Inclusion**: actively embracing people with diverse perspectives, backgrounds and experiences. And creating an environment that enables us all to feel a sense of belonging, and where everyone can take part and contribute fully.

Equality, diversity and inclusion are not identical, but they are reliant on one another to tackle discrimination. For example, we cannot achieve real inclusion unless we embrace equality and diversity. We often use diversity as an umbrella term to describe any of our equality, diversity and inclusion initiatives.

### Unlawful discrimination

When a person or group of people is treated less favourably than another person or group of people would be treated based on their protected characteristic or * religious or political opinion. **Only in Northern Ireland*

Each of the above, are grounds covered by current anti-discrimination legislation in Great Britain and, through separate legislation, in Northern Ireland.

[1] *The protected characteristics covered by anti-discrimination laws are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexand sexual orientation. Political opinion is a protected characteristic in Northern Ireland only, although in Great Britain political beliefs may be protected as a philosophical belief. Following the Supreme Court's 2025 judgment in For Women Scotland, 'sex' in the Equality Act 2010 means biological sex. Trans people remain protected from discrimination and harassment under the characteristic of gender reassignment, and may also be protected because of perceived sex or by association.*

### Types of discrimination

> **Direct discrimination** – treating someone unfairly because of their protected characteristic

> **Indirect discrimination** – A practice, policy or rule applied to everyone that may at first appear fair or neutral, but puts people of a particular protected characteristic at a particular disadvantage, unless it can be objectively justified as a proportionate means of achieving a legitimate aim

> **Discrimination by association** – a person is treated unfavourably because of another person's protected characteristic

> **Discrimination by perception** – when someone is treated unfairly because others believe they have a protected characteristic

> **Discrimination arising from disability** – treating a disabled person unfavourably because of something connected with their disability, unless this can be justified

> **Failure to make reasonable adjustments** – failing to take reasonable steps to remove a disadvantage that a disabled person faces

> **Pregnancy and maternity discrimination** – treating a woman unfavourably because of her pregnancy, a pregnancy-related illness, or because she is taking or has taken maternity leave

> **Victimisation** – treating someone badly because they have done a 'protected act' (such as making or supporting a complaint of discrimination, or giving evidence), or because it is believed they have done or may do so. This protection does not apply to someone who gives false evidence or makes a false allegation in bad faith

> **Harassment** – unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. In law, harassment does not cover marriage and civil partnership or pregnancy and maternity (these are dealt with as discrimination), and for members and service users it does not cover religion or belief or sexual orientation. WAY's own standards apply to all protected characteristics.

> **Sexual harassment** – unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It is also unlawful to treat someone less favourably because they rejected or submitted to such conduct.

> **Third-party harassment** – harassment of a member of staff by someone who does not work for WAY, such as a member, event venue, supplier or partner. From 30 October 2026 employers must take all reasonable steps to prevent it.

> **Bullying** – persistent, offensive, abusive, intimidating or insulting behaviour, abuse of power or unfair sanctions which make the recipient feel upset, threatened, humiliated or vulnerable, which undermines their self-confidence and which may cause them to sufferstress. Bullying is not in itself unlawful under the Equality Act 2010 unless it amounts to harassment, but WAY will not tolerate it.

## Positive action

When an employer or organisation takes positive steps to help or encourage certain groups to participate in activity or overcome or minimise disadvantages. For example, offering leadership development training to women when an organisation has identified that women are under-represented in senior leadership roles.

This measure stops short of allowing preference to be given to less qualified applicants (e.g. employing or promoting an individual solely because they are from an under-represented group regardless of their suitability for the position); this is considered positive discrimination and is unlawful.

The law does allow an employer choosing between two candidates who are as qualified as each other to appoint the candidate from an under-represented group (the 'tie-breaker' provision, section 159 of the Equality Act 2010). WAY will only do this where it has evidence of under-representation, and will not automatically treat such candidates more favourably.

## Occupational Requirement

In limited circumstances it is lawful to require a job holder to have a particular protected characteristic (for example, to be of a particular sex). This applies only where, given the nature or context of the work, it is an occupational requirement and applying it is a proportionate means of achieving a legitimate aim (Schedule 9, Equality Act 2010). This is referred to as an occupational requirement. WAY will take advice before relying on one.

## Reasonable Adjustments

Under anti-discrimination legislation (e.g. *Equality Act 2010*) employers must make reasonable adjustments for disabled job applicants and staff, and service providers (including WAY in relation to its members) must make reasonable adjustments for disabled people using their services. The duty to service users is anticipatory, meaning we should plan ahead rather than wait to be asked. This means making changes to a disabled person's environment or the way their employment is structured to mitigate any disadvantages, and allows them to work safely and productively. This may include, removing physical barriers, providing extra support, and providing flexibility.

# Appendix 2

**Contacts and Sources of Further Information**

**Diversity Trust**

https://www.diversitytrust.org.uk/category/blogs/

**NPC**

https://www.thinknpc.org/about-npc/expertise/diversity-and-inclusion/

**Getting onboard**

https://www.gettingonboard.org/inclusion-training

**The Association of Charitable Organisations**

https://www.aco.uk.net/resources-publications/resources-diversity-and-inclusion/

Acas – equality, diversity and inclusion at work

https://www.acas.org.uk/

Equality and Human Rights Commission (EHRC)

https://www.equalityhumanrights.com/

NCVO

https://www.ncvo.org.uk/

Charity Governance Code

https://www.charitygovernancecode.org/

Fundraising Regulator – Code of Fundraising Practice

https://www.fundraisingregulator.org.uk/