



COMPANY POLICIES

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Health and Safety Policy

The **Health and Safety at Work Act** (1974) imposes certain obligations on an employer not only to take all such actions as are reasonable to safeguard the health and safety of their employees, but also to be able to show that they are doing so, by producing adequate written policies and procedures. Crawley LGBT CIC fully accepts its responsibilities under the Act.

The Act refers to what is reasonable in given working situations.

Crawley LGBT CIC **will**:

- Assess the risks in the workplace
- Ensure that the workplace satisfies health, safety and welfare requirements for ventilation, temperature, lighting and staff facilities
- Ensure safe and clear access to and egress from the building including fire exits ● Regularly check the premises room by room for structural defects, worn fixtures and fittings or electrical equipment, and take the necessary remedial action ● Ensure that all equipment is suitable for its intended use and is properly maintained and used
- Ensure that all staff are aware of the fire procedure and regular fire drills are carried out
- Ensure that all members of staff are aware of the procedure in case of accidents ● Ensure that all members of staff are aware of and carry out their health and safety responsibilities as set out in their job descriptions
- Prohibit smoking on the premises
- Prohibit any contractor working on the premises without prior discussion with the officer in charge to negate any risks to the staff or users
- The management considers this matter of such importance, that breach of health and safety procedures by staff constitutes misconduct and will be dealt with as a disciplinary matter.

Employees and Volunteers will also be made aware of their responsibilities under the Health and Safety at Work Act and will:

- Take reasonable care of their own health and safety and that of others around them ● Co-Operate with the employer on matters of health and safety
- Use work equipment correctly
- Provide guidance to users (of the centre) and act responsibly to ensure their health and safety

Users will also be made aware of their responsibilities and will:

- Agree to use the equipment in a safe manner with regards to the health and safety of those around them (or the management can ask them to desist etc)

It is not possible to detail here all the health and safety matters that come up on a day-to-day basis, so staff and management must constantly be mindful of their responsibilities individually and collectively for the safety of themselves, their colleagues, parents and students.

Professional boundaries are what define the limits of a relationship between an employee, staff, client and general public. They are a set of standards we agree to uphold that allows this necessary relationship to exist while ensuring the correct detachment is kept in place. Crawley LGBT CIC expects all employees, self-contractors and outsourced roles to adhere to the following code of conduct to protect the professional integrity of themselves and the company.

The following professional boundaries must be adhered to:

- Personal relationships between employees, volunteers, clients and the general public are prohibited.

Crawley LGBT CIC Roles are prohibited from:

- Use of abusive language.
- Inappropriate behaviour / language.
- Engaging in bullying/ harassment/discrimination.
- Use of punishment or chastisement.
- Engaging in argumentative or aggressive discussions.
- Passing on personal contact details.
- Providing personal contact details to the general public.
- Discussing information obtained regardless of whether you deem it not to be confidential, without the prior consent of that individual.
- Providing unqualified advice.
- Accepting responsibility for any valuables on behalf of another member of staff/volunteer/public.
- Purchasing for or providing another member of staff, volunteer, public with, alcohol or drugs.
- Presenting their own opinions as those of Crawley LGBT CIC.
- Engaging in conversations with external bodies, on behalf of Crawley LGBT CIC ● Making negative posts on any social media, in relation to Crawley LGBT CIC or any of their activities, without prior content. This responsibility extends indefinitely and is not restricted to their time as an employee, volunteer.

If the professional boundaries and/or policies are breached this could result in the withdrawal of any future work, volunteering opportunities.

Grievance Policy

An expression of dissatisfaction is defined as a complaint regarding the provision of a staff member (employed or voluntary) or any other services provided by Crawley LGBT CIC or its representatives.

Who can complain?

A complaint can be made by any person who receives a service from Crawley LGBT CIC

If anyone feels they have matters they wish to raise it can be done individually or collectively: staff can feel assured that they will not encounter any disadvantage having logged a complaint in good faith. Complaints received anonymously or by third parties will not be dealt with under this Policy. Crawley LGBT CIC has full discretion on how these will be handled. If it is believed that the complaint is vexatious or malicious, the details will be handed to the relevant person/organisation and they may decide to reject the complaint without taking into consideration its full merits. In this event reasons will be given why the complaint is felt to be an abuse of process. If clarification of the scope of the Policy is required or anyone is not sure the appropriate avenues to take to pursue a complaint, candidates should contact the Director in the first instance for clarification.

Confidentiality

All aspects of a grievance will have its confidentiality preserved throughout the investigation which will safeguard the interests of all concerned unless disclosure is necessary to progress the complaint. Crawley LGBT CIC would expect all parties concerned to respect the confidentiality of the process. The person or persons the complaint or complaints are made against have the right to be advised of the facts and the nature of the complaint or complaints.

Procedure

For all complaints Crawley LGBT CIC will ensure that all reasonable and appropriate action is taken. Where a complaint is found to be justified, all appropriate remedial action will be notified as part of the decision. If at any stage a complaint is found not to be justified, the reasons for the decision will be communicated to the candidate. All complaints received by Crawley LGBT CIC will be treated as official unless the complainant informs Crawley LGBT CIC otherwise within ten days of the original complaint date. Complaints will only be accepted in writing to the Director and must be clearly marked as such to be deemed official. All complaints are recorded, and a copy of the complaint is sent to the person or persons about whom the complaint has been made, to enable them to respond. Complaints will be investigated by the relevant person depending on the subject of the complaint. Crawley LGBT CIC reserves the right to contact the person or persons about whom the complaint was made for further information. Crawley LGBT will deal with all complaints in a timely manner. If there is to be a delay all involved parties will be informed accordingly.

Unresolved Grievances

Anyone unhappy with the outcome of the complaint procedure is welcome to appeal any decisions or seek advice from an outside agency or body.

Monitoring the Process

In order that Crawley LGBT CIC can improve services to students, the receipt of complaints and responses to them will be monitored. With this information, Crawley LGBT CIC will be

able to improve their services and ensure an inclusive, consistent and constructive approach to complaints. The effectiveness of the complaint's procedure will also be kept under review and if necessary, changes will be made.

Social Media Policy

CrawleyLGBT CIC realises that social media and networking websites have become a regular part of everyday life and that many people enjoy membership of sites such as

Facebook, Instagram or Twitter. However, we are also aware that these sites can become a negative forum for complaining or gossiping and care must be taken not to breach Crawley LGBT CIC Confidentiality Policy or offend anyone when using these services.

General Information

The following policy has been designed to give all staff clear guidelines as to what Crawley LGBT CIC expects of them when accessing these sites. The absence of, or lack of, explicit reference to a specific website or service does not limit the extent of the application of this policy. Where no policy or guidelines exist, employees should use their professional judgement and take the most prudent action possible. Consult with the Director if you are uncertain.

Guidance for Personal Use

If you have your own personal profile on a social media website, you should make sure that others cannot access any content, media or information from this profile that:

- (a) you are not happy for them to have access to.
- (b) which would undermine your position as a professional, trusted and responsible person.

As a basic rule, if you are not happy for others you work with to see particular comments, media or information simply do not post it in a public forum online. When using social media sites, staff members should consider the following:

- Changing the privacy settings on your profile so that only people you have accepted as friends can see your content.
- Reviewing who is on your 'friends list' on your personal profile. In most situations you should **not** accept friend requests on your personal profile from 'clients' you work with (this includes young people, parents etc).
- Ensuring personal blogs have clear disclaimers that the views expressed by the author are theirs alone and do not represent the views of Crawley LGBT CIC. Make your writing clear that you are speaking for yourself and not on behalf of Crawley LGBT CIC
- Ensuring information published on the Internet complies with Crawley LGBT CIC confidentiality and data protection policies. Breach of confidentiality will result in disciplinary action and may result in termination of your contract or involvement with Crawley LGBT CIC

Ensuring you are always respectful towards:

1. Crawley LGBT CIC
2. Directors

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Crawley LGBT CIC (12785242)

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3. Performers
4. Other Staff Members
5. Other Agencies, Clients and Partners

- Staff should be aware that any disrespectful comments to the above might be seen as libellous and could result in disciplinary action of termination of your contract or involvement with Crawley LGBT CIC. Crawley LGBT CIC logos and trademarks may not be used without written consent.
- At all times, in or out of working hours, you are an ambassador for Crawley LGBT CIC. Be aware that your actions captured via images, posts or comments online

can reflect on the organisation.

Use of Official Accounts

Crawley LGBT CIC operates a number of accounts on social media websites for the promotion of activities and events, and as a communication method. The following outlines the limits of their use:

- An official account on any social media website may only be set-up with prior consent from the Director.
- Only authorised staff may use these accounts to post online and access to those accounts should be strictly limited.
- All information published on the Internet must comply with Crawley LGBT CIC confidentiality and data protection policies.
- Copyright laws must be respected, with references or sources cited appropriately.
- Any employee, volunteer or teacher who becomes aware of any social networking activity that would be deemed distasteful should make the Director aware as soon as possible.

All staff using official accounts must adhere to the above guidelines; breach of this policy may result in disciplinary action or termination of your contract or involvement with Crawley LGBT CIC.

Privacy Policy

Overview

- The safety, well-being and protection of our staff are the paramount considerations in all decisions staff at Crawley LGBT CIC make about confidentiality. The appropriate sharing of information between staff is an essential element in ensuring ultimate privacy.
- It is an essential part of the ethos of Crawley LGBT CIC that trust is established to enable staff to seek help both within and outside the company. We, therefore, minimise information sharing to those occasions which are appropriate to ensure staff are supported and safe.

- Staff need to know the boundaries of confidentiality in order to feel safe and comfortable in discussing personal issues and concerns.
- The companies' attitude to confidentiality is open and easily understood and everyone should be able to trust the boundaries of confidentiality operating within the company.
- Everyone in the Crawley LGBT CIC community needs to know that no one can offer absolute confidentiality and that there are limits of confidentiality that can be offered by individuals within the Crawley LGBT CIC community - so they can make informed decisions about the most appropriate person to talk to.

The expectation of Confidentiality

When speaking confidentially to someone, the confider has the belief that the confidant will not discuss the content of the conversation with another. The confider is asking for the content of the conversation to be kept secret. Anyone offering absolute confidentiality to someone else would be offering to keep the content of his or her conversation completely secret and discuss it with no one.

In practice there are few situations where absolute confidentiality is offered. We have to strike a balance between ensuring the safety, well-being and protection of our staff, ensuring there is an ethos of trust where students and staff can ask for help when they need it - and ensuring that when it is essential to share personal information and good practice are followed.

This means that in most cases what is on offer is limited confidentiality. Disclosure of the content of a conversation could be discussed with professional colleagues but the confider would not be identified except in certain circumstances. The general rule is that staff should make clear at the beginning of the conversation that there are limits to confidentiality.

The legal position for Company staff

Staff (including non-teaching and voluntary staff) should not promise confidentiality. No member of this company's staff can or should give such a promise. Company staff are not obliged to break confidentiality except where another wellbeing may be an issue, however, at Crawley LGBT CIC we believe it is important that staff are able to share their concerns about another in a professional and supportive way, on a need-to-know basis, to ensure staff receive the guidance and support they need and the students' safety and well-being is maintained. Crawley LGBT CIC staff should discuss such concerns with the Director.

Data Protection Policy

In May 2018, the regulations surrounding how companies and organisations can hold your personal data changed. This Notice tells you how we handle your Personal Data and the rights you have, when we hold it. This Notice is intended to comply with the provisions of the General Data Protection Regulation EU 2016/679 (GDPR) which governs how Personal Data is processed within the European Economic Area (EEA).

Who are we?

Crawley LGBT CIC We are the "data controller" for the purposes of GDPR. This means that we decide how your Personal Data is processed and for what purposes.

Your personal data – what is it?

Personal Data is data that relates to a living individual who can be identified from that data. We might be able to identify you from the data itself or by linking that data to other information we have access to. GDPR tells us how we must process your Personal Data.

How do we process your Personal Data?

We comply with our obligations under GDPR in the following ways:

- by keeping Personal Data up to date;
- by storing and destroying it securely;
- by not collecting or retaining unnecessary or excessive amounts of data; • by protecting Personal Data from loss, misuse, unauthorised access and disclosure; and
- by ensuring that appropriate technical measures are in place to protect Personal Data.

We use your Personal Data for the following purposes:

- To manage your membership information, point of communication and process payments for the organisation we run.
- To inform you of news, events, activities or services which we think you might like to hear about.
- To share your contact details with officials and other authorised people and companies for the purpose of delivering the service we provide.

What is the legal basis for processing your personal data?

- You have given us consent to use your Personal Data for the purposes given in the consent statement you agreed to. To see the statement again, please ask a member of Crawley LGBT CIC staff and they will be happy to produce the statement from our Crawley LGBT CIC folder.
- Where you have given us sensitive information (such as medical data), we will have asked for and you will have given us explicit consent to store and use that information. You always have the right to refuse to give us any information, particularly sensitive information.

Sharing your personal data

Your Personal Data will be treated as strictly confidential and will be shared only with organisations whose services are required in order to provide the services we offer. We use other companies to help us process your Personal Data so that we can offer you the best possible service.

We will only share your Personal Data with other third parties with your consent. These third parties, in turn, may rely on data processors to provide services that help them help us.

Some third parties we use may operate outside the EEA. In these cases, we will make sure that we have robust contracts in place with those third parties and that adequate safeguards exist to protect and secure your Personal Data.

When you give your consent to our holding of your Personal data you agree to share your Personal Data (including special categories of Personal Data – where we have your explicit consent) with third party processors and sub-processors located both inside and outside the EEA.

How long do we keep your Personal Data?

We keep your Personal Data for as long as you are a member of our organisation. After you leave, we will keep your information for no longer than we reasonably need. Usually, this will be for a period of six months. This is so that we can initiate the dismissal and disposal

process of your membership and in case of any legal/insurance claims or complaints.

Your rights and your Personal Data

Unless we have an exemption under GDPR, you have the following rights with respect to your Personal Data: -

- The right to request a copy of the Personal Data which we hold about you, without any charge.
- The right to request that we correct any Personal Data found to be inaccurate or out of date.
- The right to request that your Personal Data is erased where it is no longer necessary for us to keep it.
- The right to withdraw your consent to the processing we carry out at any time.
- The right to request that we provide you with your Personal Data and, where possible, to send that data directly to another data controller.
- The right, where there is a dispute in relation to the accuracy or processing of your Personal Data, to ask us to restrict further processing.
- The right to object to the processing of Personal Data.
- The right to lodge a complaint with the Information Commissioners Office and to seek legal recourse.

Further processing

If we wish to use your Personal Data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use. We will do this before we start processing for the new use. We will set out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

If you have a problem, complaint or, if there is something you don't understand, please contact us first using the following:

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Disciplinary & Dismissal Policy

The purpose of a disciplinary procedure is to ensure the safe and effective operation of the business and to promote fair treatment of individual employees. The following procedure provides a framework to address any lapses in conduct and encourages individual employees to achieve and maintain an acceptable standard.

This policy does not apply to dismissals, where the employment is terminated for a reason unconnected to disciplinary action, such as in the event of redundancy, retirement, or non-renewal of a fixed term contract. If these situations arise Crawley LGBT CIC will follow a fair and reasonable procedure, which will include consultation with you prior to any dismissal taking effect.

Informal Warnings

Minor breaches of Crawley LGBT CIC standards of conduct may result in an informal warning being given to you by a Company Director. The objective of the warning is to help you to improve your conduct or attendance without having to use a formal procedure.

An informal warning is normally given verbally, although a note may be kept in your personnel file of what was discussed and what was agreed. Your manager will monitor your conduct over an agreed period. If you do not improve satisfactorily, or there are any further breaches of company standards, then the formal disciplinary procedure will be invoked.

Investigation

If it becomes necessary to formally address issues regarding your conduct or attendance the matter will first be investigated by an appropriate manager.

This investigation will be carried out thoroughly and as quickly as possible in all the circumstances. Confidentiality will be maintained, as far as is reasonably practicable, during the investigation and throughout the disciplinary process, should this be activated.

Under certain circumstances, including but not limited to harassment, bullying, theft and violence, the Company may decide to suspend you on full/basic pay, while the matter is being investigated. This is not a disciplinary sanction, but a way of ensuring that a full review of the circumstances can take place as effectively as possible.

Criminal Charges

Where your conduct is the subject of a criminal investigation, charge or conviction we will investigate the facts before deciding whether to take formal disciplinary action. We will not usually wait for the outcome of any prosecution before deciding what action, if any, to take. Where you are unable or have been advised not to attend a disciplinary hearing or say

anything about a pending criminal matter, we may have to take a decision based on the available evidence.

A criminal investigation, charge or conviction relating to conduct outside work may be treated as a disciplinary matter if we consider that it is relevant to your employment.

Disciplinary Meeting

If, after an investigation has been carried out, it is considered that there is a case to answer, you will be notified in writing of the nature of the complaint against you. You will be provided with details of any supporting evidence which may be available and will be invited to attend a disciplinary meeting. You will be advised that disciplinary action may be taken as a result of this meeting and of your statutory right to be accompanied at this meeting by a colleague or a trade union representative. You should take reasonable steps to attend this meeting. If you are persistently unable or unwilling to attend, the Company reserves the right to proceed in your absence.

This meeting will be conducted by an appropriate manager. The Company may also have someone present at the meeting to take notes.

At this meeting the nature of the alleged breach of Company standards will be made clear to you and you will be given the opportunity to state your case and call any relevant witnesses. If any additional issues arise during this meeting, an adjournment may take place to allow further investigation.

During the disciplinary process or appeal, you will be provided with copies of any notes, witness statements or interview transcripts that the Company considers to be relevant as soon as they become available.

Right to be Accompanied

You may bring a companion to any disciplinary hearing or appeal hearing under this procedure. The companion may be either a trade union representative or a colleague. You must tell HR who your chosen companion is, at least 24 hours before the hearing.

The companion is allowed reasonable time off from duties without loss of pay but no-one is obliged to act as a companion if they do not wish to do so. If your companion is unavailable at the time a meeting is scheduled and will not be available for more than five working days afterwards, we may ask you to choose someone else.

Disciplinary Action

If, at the conclusion of a disciplinary meeting, or shortly thereafter, it is decided that there has been a breach of standards, formal disciplinary action will be taken.

If you are issued with a warning, you will be informed of the period for which the warning will remain in place. A copy of the written warning will be kept in your personnel file. If your conduct [or attendance] has reached an acceptable level after the specified period, the warning will be disregarded for disciplinary purposes, but will be kept on your personnel file.

If you wish to appeal against any level of disciplinary sanction, including dismissal, you should follow the procedure for appeals set out below.

Stage 1 – Oral Warning

If your conduct [or attendance] is unsatisfactory or there is no improvement, or another breach of Company standard occurs, after an informal warning has been issued, you will be given a formal ORAL WARNING, a note of which will be held on your personnel file. You will also be reminded that if there is no improvement, or a further breach occurs, within a specified period, further disciplinary action will be taken.

Stage 2 – Written Warning

If the breach of Company standards is more serious, or there is no improvement in your conduct [or attendance] or another breach of Company standard occurs, you will receive a WRITTEN WARNING. This will include the reason for the warning, give details of how you should improve and remind you that if there is no improvement, or a further breach occurs, within the specified period, further disciplinary action will be taken.

Stage 3 – Final Written Warning

If the breach of Company standards is very serious, or there is still no improvement in your conduct [or attendance] or another breach of Company standard occurs, despite a previous warning, a FINAL WRITTEN WARNING will be given. This will include the reason for the warning, giving details of how you should improve, and remind you that if there is no improvement, or a further breach occurs, within the specified period, you may be DISMISSED.

Stage 4 – Dismissal or other disciplinary action

If there is no satisfactory improvement in your conduct [or attendance] or if a further breach of Company standards occurs, you may be DISMISSED (or other disciplinary action may be taken i.e. demotion/ transfer/ reduction of pay/ suspension without pay). You will be informed in writing of the decision, given details of the reason for the dismissal, or other disciplinary action, your termination date (if relevant), the appropriate period of notice or amount of pay in lieu of notice, and details of your right to appeal.

A decision to dismiss or impose other disciplinary action will normally be taken by [a senior manager] and dismissal will only be applied if the Company does not consider any alternative to dismissal would be appropriate.

If you are dismissed under this policy your employment will terminate on the date specified in writing. Your employment will NOT be suspended pending the outcome of any appeal

procedure. Should an appeal reverse the decision to dismiss you, you will be reinstated with no break in service and any monies owing to you will be paid.

Any of the above stages of disciplinary action may be omitted, depending on the seriousness of the misconduct.

Gross Misconduct

If you are found guilty of gross misconduct the Company is entitled to summarily dismiss you. This means that you will be dismissed with immediate effect, without notice or pay in lieu of notice. Alternatively, the Company may impose another penalty short of dismissal.

Examples of gross misconduct include, but are not limited to:

- Theft, fraud or deliberate falsification of records
- Misuse, abuse or deliberate damage to Company property, including intellectual property, or that of other employees
- The supply or possession of alcohol or illegal drugs, or being under the influence of alcohol or illegal drugs on the Company's premises or during working hours
- Physical violence, actual or threatened
- Serious act of insubordination
- Inappropriate use of internet, intranet and email facilities
- Harassment or discrimination on any grounds
- Accepting or offering a bribe [or any other breach of the Company's anti-corruption and bribery policy]
- Disclosure of confidential information
- Serious breach of the health and safety rules
- Serious or repeated negligent acts in the performance of your duties •

Persistent or serious failure to follow reasonable instructions

- Giving false or misleading information to the Company

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- Leaving the workplace without permission or reasonable excuse •

Serious disregard for rules or instructions given by the Company •

Unauthorised absence

- Bringing the Company into disrepute

Procedures to appeal against Dismissal or other Disciplinary Action

Your appeal must be made in writing to a senior manager within 5 working days of the decision being communicated to you in writing and you should detail your reason(s) for appealing against the disciplinary action.

You will be notified of your statutory right to be accompanied at the appeal meeting by a colleague or a trade union representative. If additional issues or new evidence arise during

this meeting, an adjournment may take place to allow for these to be investigated.

After considering your appeal, a decision may be taken to uphold the dismissal or other disciplinary action or to overturn the findings of the disciplinary meeting. You will be informed of the outcome of the appeal and the reasons for the decision in writing, as soon as possible. The decision which is reached is final.

Safeguarding Policy for Children and Young People

1.Introduction

CRAWLEY LGBT CIC believes that it is always unacceptable for a child or young person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and young people, by a commitment to practice which protects them.

CRAWLEY LGBT CIC recognises that:

- the welfare of the child/young person is paramount
- all children and young people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

The purpose of this policy is:

- to provide protection for the children and young people who receive *CRAWLEY*

LGBT CIC services, including the children of adult service users

- to provide staff and volunteers with the overarching principles that guide our approach to safeguarding children and young people

This policy applies to all staff, including senior managers and the board of trustees, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of *CRAWLEY LGBT CIC*.

CRAWLEY LGBT CIC seeks to safeguard children and young people by:

- valuing them, listening to and respecting them
- adopting child protection guidelines through procedures and a code of conduct for staff and volunteers
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- sharing information about child protection and good practice with children/young people, parents, staff and volunteers
- sharing information about concerns with agencies who need to know, and involving parents and children/young people appropriately
- providing effective management for staff and volunteers through supervision, support and training

2. Nominated safeguarding lead person

The nominated person, *VINCENT WOOTTON/JULIE MCAULEY-WALKER/BEN FERRIS*, should be notified immediately by any staff or volunteers who have concerns about:

- a child or young person (see section 4)
- a person who works with children (see section 5)

Concerns should be raised if:

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- a child has been harmed, or may have been,
- a criminal offence has possibly been committed against or related to a child or young person; or someone has behaved in a way that indicates they may pose a risk of harm to children or young people.

The nominated person will provide advice and support to staff/volunteers unsure about how to proceed with a particular case, and take line management responsibility for the safe delivery, quality and effectiveness of *CRAWLEY LGBT CIC* services. The nominated person is responsible for ensuring *CRAWLEY LGBT CIC* is aware of developments in safeguarding best practice, advising on changes to policy and practice (in line with Local Safeguarding Board policies) and coordinating safeguarding audits and reporting.

One of *CRAWLEY LGBT CIC* Trustees is nominated to take leadership responsibility for the organisation's safeguarding arrangements. This includes ensuring that staff have sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities effectively.

3. How to raise concerns about a child or young person

- a) If someone is at immediate risk of harm, dial 999 for the police
- b) Contact *CRAWLEY LGBT CIC* by email as soon as possible. A decision will be made which includes whether to make a referral; who will make the referral, and how information about the concern will be securely recorded, stored and, if appropriate,

shared.

c) To report a concern or to get advice: NSPCC Helpline 0808 800 5000 / Crawley Borough Council

4. How to report an allegation made against staff or volunteers An allegation may relate to a person who works with children or young people who has: ▪ behaved in a way that has harmed, or may have harmed, a child/young person; ▪ possibly committed a criminal offence against or related to a child/young person; or

- behaved in a way that indicates they may pose a risk of harm to children/young people.

Any allegation against people who work with children or young people should be reported immediately to *VINCENT WOOTTON/JULIE MCAULEY-WALKER/BEN FERRIS*. The relevant local authority should be informed within one working day (Local Authority Designated Officer LADO).

The local authority will provide advice and guidance on how to deal with allegations against people who work with children/young people and will also ensure that there are appropriate arrangements in place to effectively liaise with the police and other agencies to monitor the progress of cases and ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. Support and advice will be available to individuals against whom allegations have been made.

If *CRAWLEY LGBT CIC* removes an individual (paid worker or unpaid volunteer) from work (or would have, had the person not left first) because the person poses a risk of harm to

children, the organisation must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.

6. Independent resources for children and young people

Children and young people can speak to an independent person outside of *CRAWLEY LGBT CIC* through making contact with either of the following: Childline on 0800 1111 / NSPCC helpline: 0800 328 0904

5. Being alert to signs of abuse and neglect and taking action

All staff and volunteers should be alert to the signs and triggers of child abuse and neglect. Indicators of abuse and neglect may be difficult to spot. Children and young people may disclose abuse but in some cases, the indicators may be more subtle and appear over time. Everyone should be aware of the potential for children to be sexually exploited for money, power or status and individuals should adopt an open and inquiring mind to what could be underlying reasons for behaviour changes in children of all ages.

CRAWLEY LGBT CIC will ensure all staff and volunteers are aware of;

- the signs of abuse and neglect,
- how to handle a disclosure through induction, training and supervision.

6. Information sharing

Sharing information is an intrinsic part of safeguarding children and young people. The decisions about how much information to share, with whom and when, can have a

profound impact on individuals' lives. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people at risk of abuse or neglect. No practitioner should assume that someone else will pass on information which may be critical to keeping a child or young person safe.

The seven golden rules to sharing information are:

- Remember that Data Protection and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about individuals is shared appropriately.
- Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from the nominated person if you are in any doubt about sharing the information concerned.
- Share with informed consent where appropriate. Remember that you may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.
- Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
 - Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

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- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

In *CRAWLEY LGBT CIC* work, the starting point for information sharing is to follow the steps in Sections 4 or 5 of this policy.

If children and young people have access to the internet or use mobile phones during time spent with *CRAWLEY LGBT CIC* projects, computers will be placed where everyone can see them and use of the internet will be supervised when used by children and young people.

7. Code of behaviour

This section outlines the behaviour expected of *CRAWLEY LGBT CIC* staff, volunteers, peer leaders and staff from other organisations who engage with children and young people through *CRAWLEY LGBT CIC* and its activities.

This code has been developed to provide advice which will not only help to protect children and young people, but will also help identify any practices which could be mistakenly interpreted and perhaps lead to false allegations of abuse being made against individuals. Following this good practice code will also help to protect *CRAWLEY LGBT CIC* by reducing the possibility of anyone using their role within the organisation to gain access to children and young people in order to abuse them.

When working with children and young people for *CRAWLEY LGBT CIC* all staff and volunteers are considered to be acting in a position of trust. It is therefore important that staff and volunteers are aware that they may be seen as role models by children and

young people and must act in an appropriate manner at all times and follow the code of conduct.

All members of staff and volunteers are expected to report any breaches of this code to the nominated person, *VINCENT WOOTTON/JULIE MCAULEY-WALKER/BEN FERRIS*, Staff and volunteers who breach this code of conduct may be subject to *CRAWLEY LGBT CIC* disciplinary procedures.

Any breach of this code involving a volunteer or member of staff from another agency may result in them being asked to leave the project. Serious breaches of this code may also result in a referral being made to a statutory agency such as the Police or Children's Services Department.

Adults must:

- treat all children and young people with respect
- treat children and young people fairly, without prejudice and always avoid favouritism
- value and take seriously children's and young people's contributions ▪ provide an example of good conduct for others to follow
- ensure that, whenever possible, there is more than one adult present during activities with children and young people
- respect a young person's right to personal privacy/encourage young people and adults to feel comfortable and caring enough to point out attitudes or behaviour they do not like
- ensure any contact with children and young people is appropriate and relates to the work of the project

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- remember that someone else might misinterpret actions, no matter how well-intentioned
- be aware that any physical contact with a child or young person may be misinterpreted
- recognise that special caution is required when you are discussing sensitive issues with children or young people
- challenge unacceptable behaviour and report all allegations/suspensions of abuse

Adults must not:

- have inappropriate physical or verbal contact with children or young people
- act in a way that can be perceived as threatening or intrusive
- be drawn into inappropriate attention-seeking behaviour
- make suggestive or derogatory remarks or gestures in front of children

or young people

- jump to conclusions about others without checking facts
- either exaggerate or trivialise child abuse issues
- show favouritism to any individual
- rely on their good name or that of *CRAWLEY LGBT CIC* to protect them
- believe "it could never happen to me"
- take a chance when common sense, policy or practice suggests

another more prudent approach

• make inappropriate promises to children and young people, particularly in relation to confidentiality

- allow allegations to go unreported
- let children and young people have their personal contact details (mobile

number or private address).

Safeguarding Vulnerable Adults Policy

1 Aim of Policy

All adults have the right to be safe from harm and must be able to live free from fear of abuse, neglect and exploitation.

The purpose of this policy is to outline the duty and responsibility of staff, volunteers and trustees working on behalf of CRAWLEY LGBT CIC in relation to Safeguarding Vulnerable Adults. The policy aims to provide staff with an overview of vulnerable adult protection and provides a clear procedure that will be implemented where vulnerable adult protection issues arise.

2 Definition of vulnerable adult

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.

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This includes people who may be in need of community care services by reason of mental or other disability, age or illness. It could include people with learning disabilities, mental health problems, older people and people with a physical or sensory disability or impairment, including people whose condition and subsequent vulnerability fluctuates.

It may also include victims of domestic abuse, hate crime and anti-social abuse behaviour. The persons' need for additional support to protect themselves may be increased when complicated by additional factors, such as, physical frailty or chronic illness, sensory impairment, challenging behaviour, drug or alcohol problems, social or emotional problems, poverty or homelessness.

There may be some situations where victims are unaware that they are being abused. For instance an elderly person, accepting that they are dependent on their family, may feel that they must tolerate losing control of their finances or their physical environment. They may be reluctant to assert themselves for fear of upsetting their carers or making the situation worse.

3 What is abuse?

The characteristics of adult abuse can take a number of forms and cause victims to suffer pain, fear and distress reaching well beyond the time of the actual incident(s). It may consist of a single act or repeated acts and can occur in any relationship and may result in significant harm to, or exploitation of, the individual. The Department of Health in its 'No Secrets' 2000 report suggests the following as the main types of abuse:

- **Physical abuse** - including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- **Sexual abuse** - including rape and sexual assault or sexual acts to which the

vulnerable adult has not consented, or could not consent or was pressured into consenting.

- **Psychological abuse** - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- **Financial or material abuse** - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Neglect and acts of omission** - including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Discriminatory abuse** - including race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment, hate crime.

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- **Institutional abuse** - Institutional abuse although not a separate category of abuse in itself, requires specific mention simply to highlight that adults placed in any kind of care home or day care establishment are potentially vulnerable to abuse and exploitation. This can be especially so when care standards and practices fall below an acceptable level as detailed in the contract specification.
- **Multiple forms of abuse** - Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.

4. Domestic abuse/violence

Home Office definition 2012

“Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- *psychological*
- *physical*
- *sexual*
- *financial*
- *emotional*

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.”

This definition, which is not a legal definition, includes so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

It is important to recognise that Vulnerable Adults may be the victims of Domestic Abuse themselves or be affected by it occurring within their household. This is likely to have a serious effect on their physical and mental wellbeing.

Where Vulnerable Adults are victims of Domestic Abuse, they may need extra support to plan their future. The violence or threat of violence may continue after a victim has separated

from the abuser. It is important to ensure that all the vulnerable people in this situation have appropriate support to enable them to maintain their personal safety.

5 The role of staff, volunteers and trustees

All staff, volunteers and trustees working on behalf of CRAWLEY LGBT CIC have a duty to promote the welfare and safety of vulnerable adults.

Staff, volunteers and trustees may receive disclosures of abuse and observe vulnerable adults who are at risk. This policy will enable staff/volunteers to make informed and confident responses to specific adult protection issues.

6 Procedure in the event of a complaint or allegation

It is important that vulnerable adults are protected from abuse. All complaints, allegations or suspicions must be taken seriously.

This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult has been abused.

Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual.

A full record shall be made as soon as possible of the nature of the allegation and any other relevant information. This must include information in relation to the date, the time, the place where the alleged abuse happened, the names of others present, the name of the complainant and, where different, the name of the adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation.

In the event of an incident or disclosure:

DO

- Make sure the individual is safe
- Assess whether emergency services are required and if needed call them ▪

Listen

- Offer support and reassurance
- Ascertain and establish the basic facts
- Make careful notes and obtain agreement on them
- Ensure notation of dates, time and persons present are correct and agreed

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- Take all necessary precautions to preserve forensic evidence
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to your manager for ▪

Support and guidance

- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support.

DON'T

- Confront the alleged abuser
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond that which is necessary to establish the basic facts ▪

Disturb or destroy possible forensic evidence

- Consult with persons not directly involved with the situation
- Ask leading questions
- Assume Information
- Make promises
- Ignore the allegation
- Elaborate in your notes

- Panic

It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the professional adult protection agencies, following a referral from the designated Vulnerable Adult Protection Officer.

Any suspicion, allegation or incident of abuse must be reported to the Designated Adult Protection Lead or Senior Manager on that working day where possible.

The nominated member of staff shall telephone and report the matter to the appropriate local adult social services duty social worker. A written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant local authority adult social services department within 24 hours.

7 Confidentiality

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Vulnerable adult protection raises issues of confidentiality which must be clearly understood by all. Staff, volunteers and trustees have a professional responsibility to share relevant information about the protection of vulnerable adults with other professionals, particularly investigative agencies and adult social services. Clear boundaries of confidentiality will be communicated to all.

All personal information regarding a vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines.

If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies. Within that context, the adult must, however, be assured that the matter will be disclosed only to people who need to know about it.

Where possible, consent must be obtained from the adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult is the priority.

When a disclosure has been made, staff must let the adult know the position regarding their role and what action they will have to take as a result. Staff must assure the adult that they will keep them informed of any action to be taken and why. The adults' involvement in the process of sharing information must be fully considered and their wishes and feelings taken into account.

8 Role of designated vulnerable adult protection officer

The role of the designated officer is to deal with all instances involving adult protection that arise within the organisation. They will respond to all vulnerable adult protection concerns and enquiries.

The designated Vulnerable Adult Protection Lead for CRAWLEY LGBT CIC is Julie

McAuley-Walker/Ben Ferris

Please contact this officer if you have any suspicions or concerns relating to Adult Protection.

In the circumstance where contact with Crawley LGBT CIC is not applicable, please refer to

West Sussex County Council - Raise Concerns:

<https://www.westsussex.gov.uk/social-care-and-health/social-care-support/adults/raise-a-concern-about-an-adult/>

NHS Social Care & Support:

<https://www.nhs.uk/conditions/social-care-and-support-guide/help-from-social-services-and-charities/abuse-and-neglect-adults-at-risk/>

9 Role of Line Manager

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The role of the line manager is to support the member of staff, trustee or volunteer involved with the incident and to ensure the correct procedures are followed. The line manager could, if agreed with the staff member dealing with the incident, make contact with the designated Adult Protection Lead in the first instance.

The line manager must ensure that all staff within their team are familiar with the organisation's vulnerable adult protection procedures and ensure that all staff undertake training, where appropriate.

10 Training

Training will be provided, as appropriate, to ensure that staff and volunteers are aware of these procedures. Additional training may be required where appropriate. Specialist training will be provided for the member of staff with vulnerable adult protection responsibilities.

11 DBS Checks (formerly known as CRB checks)

The Disclosure and Barring Service requires all people that are involved in any of the following activities to undergo an enhanced DBS check and CRAWLEY LGBT CIC will adhere to these requirements. Existing staff and volunteers will be re-checked every three years. Activities that require a DBS check are:

- Healthcare;
- Personal care – washing and dressing, eating, drinking and toileting;
- Social work – in connection with health or social services;
- Assistance with household affairs – e.g. cash, bills, shopping;
- Assistance with conduct of affairs – e.g. Power of Attorney/Deputies appointed under the Mental Capacity Act;
- Conveying an Adult – must be for health, personal or social care due to age, illness or disability (this does not apply to taxi drivers).

Appendix 1

Incident Report Form

Initial cause for concern form which must be discussed with Line Manager/ Safeguarding Lead or Member of the Senior Management Team within 24 – 48 hours. If out of hours – Inform on-call manager who will in turn inform members of the senior management team.

Date:

Time

Name of individual cause for concern is about

Age (if known)

Address (if known)

Describe your concern and action taken

Observations to support cause for concern

Description and location of any visible marks, bruising etc.

Names of any witnesses (where appropriate)

Name of alleged abuser (if known)

Name of person completing form:

Signature: Date:

Name of Line Manager:

Signature: Date:

Name of Safeguarding lead or Senior Manager

Signature: Date:

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Equalities and Diversity Policy

What do we mean by equality and diversity?

Equality is simply about making sure that people are treated fairly and given equal access to opportunities and resources. Equality is not about treating everyone in the same way, it is about treating everyone fairly, with respect and recognises that people from different backgrounds may have needs that are met in different ways.

Diversity is about valuing individual differences. Diversity challenges us to recognise and value all sorts of differences that exist when people work together in order to build stronger communities and harmonious environments for the benefit of all.

People come from a wide variety of backgrounds and we can be different from one another in many different ways. These can include differences that are highlighted in current equality legislation such as race, religion and sex but also include things like our personality, personal interests and lifestyle choices, such as being a vegetarian or a smoker.

Why is promoting equality and diversity important?

Equality and diversity are becoming more important in all aspects of our lives for a number of reasons.

- We live in an increasingly diverse society and need to be able to understand and respect diversity and respond appropriately and sensitively to differences in others.
- Management committees, volunteers and the people who benefit from their work will reflect this diversity in many ways including ethnic and community background, gender, religion, political opinion, disability, sexuality and age.
- The successful implementation of equality and diversity standards in all aspects of volunteering will help to provide a good and harmonious environment for all. It will also ensure that volunteers, employees and service users are all valued, respected, motivated and treated fairly.
- We all have the right to be protected from discrimination and harassment. We also

have a responsibility not to discriminate against others.

What do we mean by discrimination?

Essentially, we mean treating someone unfairly in some way because of their background but this can happen in different ways and for different reasons.

In the UK we have an equality and human rights legal framework which covers things like employment, housing, education and service delivery. It provides protection for everyone based on a specific list of equality grounds:

Equality Grounds: gender; gender reassignment; being married or in a civil partnership; pregnancy or maternity leave; religious belief and / or political opinion; race, colour,

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nationality, ethnic or national origins, being an Irish Traveller; disability; sexual orientation; age.

Equality legislation also identifies a number of types of discrimination that people need protection from:

- Direct discrimination occurs where a person is treated less favourably than other persons and where the only reason for the treatment is on one or more of the equality grounds.
- Indirect discrimination occurs where a provision, criterion or practice is applied equally to everyone but puts people from a particular background at a disadvantage compared to others; and which is not a reasonable and proportionate means of achieving a legitimate aim.
- Disability discrimination: One of the most notable features of the disability discrimination legislation is that in prescribed circumstances it imposes a duty on employers and service providers to make reasonable adjustments in order to remove or reduce disadvantages suffered by disabled people in those circumstances.

The duty to make reasonable adjustments may require that policies, practices and procedures are modified or waived; or that certain physical features of premises are removed, altered or avoided; or that auxiliary aids or services are provided. A failure to comply with the duty, when it arises, is a form of disability discrimination.

Harassment is unwanted conduct which is related to any of the equality grounds and which has the purpose or effect of violating a person's dignity or of creating an intimidating, degrading, humiliating or offensive environment for that person. Many forms of behaviour can constitute harassment including physical assault, using derogatory language and visual or written material containing derogatory words or images.

Introduction

CRAWLEY LGBT CIC accepts that in society certain groups or individuals are denied equality on the grounds of race, gender, marital status, caring responsibilities, disability, gender reassignment, age, social class, sexual orientation and religion/belief or any other factor irrelevant to the purpose in view.

CRAWLEY LGBT CIC recognises that it has moral and social responsibilities that go beyond the provisions of the above-mentioned Acts and Regulations, and that it should support and contribute to the wider process of change through all aspects of its work and practices in order to eliminate discrimination and promote equality and diversity.

We are committed to taking positive steps to ensure that:

- all people are treated with dignity and respect, valuing the diversity of all; ▪ equality of opportunity and diversity is promoted;
- services are accessible, appropriate and delivered fairly to all;
- The mix of its volunteers and management committees reflects, as far as possible, the broad mix of the population of its local community.

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Policy

This policy applies to all volunteers, management committee members, users and the general public.

Commitment

Equality and diversity are central to the work of CRAWLEY LGBT CIC. We will treat all people with dignity and respect, valuing the diversity of all. It will promote equality of opportunity and diversity. It will eliminate all forms of discrimination on grounds of race, gender, marital status, caring responsibilities, disability, gender reassignment, age, social class, sexual orientation, religion/ belief, irrelevant offending background or any other factor irrelevant to the purpose in view. It will tackle social exclusion, inequality, discrimination and disadvantage.

Aims

We aim to:

- Provide services that are accessible according to need;
- Promote equality of opportunity and diversity in volunteering, employment and development;
- Create effective partnerships with all parts of our community.

Objectives

Our objective is to realise its standards by:

- Sustaining, regularly evaluating and continually improving its services to ensure equality and diversity principles and best practice are embedded in our performance to meet the needs of individuals and groups;
- Working together with the community to provide accessible and relevant service provision that responds to service users' needs;
- Ensuring staff, volunteers and trustees are representative of the community served and the employment policies are fair and robust;
- Responding to volunteer's & employees' needs and encouraging their development to increase their contribution to effective service delivery;
- Recognising and valuing the differences and individual contribution that all people make to our group;
- Challenging discrimination;

- Providing fair resource allocation;
- Being accountable.

Procedures

This policy covers the behaviour of all people volunteering with our group or using the services and sets out the way they can expect to be treated in turn by our group. The overall responsibility for ensuring adherence to and implementation of this policy lies with the management committee.

We will ensure that the management committee, volunteers and users are made aware, understand, agree with, and are willing to implement this policy. All volunteers will be given a copy of this policy as part of their induction. We will actively encourage Trustees, staff,

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management committee and volunteers to participate in anti-discriminatory training, and make time and resources available for such training.

We will regularly monitor the services, publicity and events provided by the group to ensure that they are accessible to all sections of the population and do not discriminate, and take active steps to ensure that participation is representative.

Monitoring and Reviewing

CRAWLEY LGBT CIC has declared its commitment to establishing, developing, implementing and reviewing a policy of equality of opportunity. Effective record keeping and monitoring, and acting on information gathered, are essential in order to measure effectiveness and plan progress. The management committee will review the policy annually.

ENVIRONMENTAL POLICY

Crawley LGBT is committed to both the protection of the environment and evaluating the impact that the organisation's services can have.

Compliance with legislation is the minimum standard to which the Company shall adhere.

The Company shall also endeavour to follow best practice with due regard for its business needs, and the expectations of all interested parties. The objectives for the Company under this policy are to:

- Reduce the carbon footprint of the business.
- Reduce energy consumption.
- Minimise the production of all types of waste, especially paper. Encourage reuse, recycling and the disposal of other waste that cannot be avoided, in a responsible manner.

All Directors will be responsible for communicating and implementing this Policy and will ensure that:

- Employees and contractors are encouraged to be receptive to the personal impact

they can have on this policy and to report areas of concern.

- Training is provided as part of staff development taking into account responsibilities.
- Efforts are made to minimise travel by maximising IT systems.
- Favour the use of suppliers who are committed to environmental good practice. ● Carbon offsetting is implemented, that as a minimum, is commensurate to the level of the business travel.
- Pollution is prevented in all forms, especially from redundant electrical equipment. ● All incidents detrimental to the environment are reported, investigated and action taken to prevent reoccurrence.

The Directors are committed to continually improving its performance by regularly reviewing its environmental impacts, and on an annual basis, update this policy in line with the review

