

Lincolnshire Police

Policy Document



Equality, diversity, and inclusion policy PD 267

Policy document information

Reference number: PD 267

Policy sponsor: Deputy Chief Constable – Chris Davison

Policy owner: Head of Equality, Diversity and Inclusion – Graeme Simpkin

Author: Head of Equality, Diversity and Inclusion – Graeme Simpkin

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Version history

Version	Date	Reason for issue
1	04/12/23	Initial creation
2	12/01/26	Review of Policy

Code of Ethics

All staff involved in carrying out functions under this policy and associated procedures and appendices will do so in accordance with the principles of the Code of Ethics. The aim of the Code of Ethics is to support each member of the policing profession to deliver the highest professional standards in their service to the public.

Legislative compliance

This document has been drafted to comply with the principles of the Human Rights Act. Proportionality has been identified as the key to Human Rights compliance, this means striking a fair balance between the rights of the staff and those of the rest of the community. There must be a reasonable relationship between the aim to be achieved and the means used.

Equality and Diversity aspects have also been considered to ensure compliance with the Equality Act 2010 and meet our legal obligation in relation to the Public Sector Equality Duty. In addition, Data Protection, Freedom of Information and Health and Safety Issues have been considered. Adherence to this policy or procedure will therefore ensure compliance with all relevant legislation and internal policies.

Other legislation/law which this policy has been drafted to comply with:

- [Human Rights Act 1998 \(in particular A.14 – Prohibition of discrimination\)](#)
- [Equality Act 2010](#)
- [The Police \(Conduct\) Regulations 2020](#)
- [Crime and Disorder Act 1998](#)
- [Health & Safety legislation](#)(Health and Safety at Work Act 1974)

- [Employers' duties in protecting disabled people at work: Overview - HSE](#)
- [Protecting pregnant workers and new mothers - HSE](#)
- [Data Protection Act 2018](#)
- [Freedom Of Information Act 2000](#)
- [Police Code of Ethics](#)
- [The Code of Practice for Victims of Crime](#)
- [Code of Practice for Ethical Policing | College of Policing](#)
- [Guidance for ethical and professional behaviour in policing | College of Policing](#)

Security classification

Policy to be published on Intranet: Yes

Policy to be published on Force Website: Yes

Authorised Professional Practice (APP)

This policy has been checked against APP and there is none in relation to the subject matter of this policy. However, Equality, Diversity and Inclusion is a consideration in all APPs produced by the college.

1. Policy aims (Purpose)

- 1.1. This Policy aims to document the governance, approach and compliance to Equality, Diversity, and Inclusion (EDI) at Lincolnshire Police. It aims to clarify the responsibilities of all Officers, Staff and Volunteers in respect of Equality, Diversity, and Inclusion.
- 1.2. One of the values of Lincolnshire Police is to be Inclusive. It is a collective responsibility of everyone to ensure the force is respectful and considerate, putting people at the heart of what we do. Our Equality, Diversity and Inclusion Policy is to ensure we all demonstrate this value for our officers, staff, volunteers, partners and the communities we serve.

- 1.3. Our Equality, Diversity and Inclusion vision in force is to enable a representative, inclusive and supportive force that recognises, respects, and understands the differences and needs of individuals and communities.

2. Policy statement (Key information)

2.1. Equality Act 2010

- 2.1.1. The Equality Act 2010 is the UK's discrimination law, which legally protects individuals from unfair treatment and promotes a fairer and more equal society and it serves to protect people from discrimination, harassment and victimisation in work, education and when accessing services.

- 2.1.2. The Equality Act 2010 protects anyone who falls into the following protected characteristics:

- Age
- Disability
- Gender Re-Assignment
- Marriage and Civil Partnership
- Race
- Religion
- Pregnancy and Maternity
- Sex
- Sexual Orientation

2.2. Public Sector Equality Duty 2011 (PSED)

- 2.2.1. Within the legislation, public sector bodies and organisations, including Lincolnshire Police, must ensure that in carrying out their functions, they have due regard to the need to achieve the objectives set out under s149 Equality Act 2010 to:

- a. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;

- b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

2.2.2. To ensure transparency, and to assist in the performance of this duty, the Equality Act 2010 (Specific Duties) Regulations 2011 require public authorities, to publish:

- equality objectives, at least every four years (from 6th April 2012)
- information to demonstrate their compliance with the public sector equality duty (from 31st January 2012)

2.3. Definitions of Discrimination, Harassment and Victimisation

2.3.1. **Discrimination** refers treating someone less favourably than someone else because of a protected characteristic. Less favourable treatment can be anything that puts someone at a disadvantage, compared to someone who does not have the protected characteristic. This could mean, but is not exclusive to, excluding someone from opportunity, making it harder for someone to do their job or causing financial loss.

- **Direct Discrimination** is when a person is treated less favourably on the grounds of possessing a 'protected characteristic' or someone who is thought to possess a protected characteristic.
- **Associative Discrimination** applies to all protected characteristics except pregnancy/maternity and marital status and is direct discrimination against someone because they associate with another person who possesses or is thought to possess a protected characteristic.
- **Perceptive Discrimination** applies to all protected characteristics except pregnancy/maternity and marital status and is direct discrimination against an individual because others think that they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

- **Indirect Discrimination** applies to all protected characteristics with the exception of pregnancy/maternity. It can occur when an employer applies a condition, rule or practice to everyone which disadvantages individuals who share a protected characteristic. Indirect discrimination can be justified if it can be shown that the application of the condition, rule or practice has been applied in a reasonable manner i.e. that it is **‘a proportionate means of achieving a legitimate aim’**.

2.3.2. Harassment is defined as “unwanted conduct related to a specific trait or characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.” In the Equality Act 2010 there are 3 types of harassment:

- Harassment related to certain protected characteristics.
- Sexual harassment.
- Less favourable treatment as a result of harassment.

2.3.3. Individuals can complain of behaviour that they find offensive even if it is not directed at them, and/or they do not possess the protected characteristic themselves. Individuals are also protected from harassment because of perception and association.

2.3.4. Forms of harassment can include unwanted and unwelcome behaviour either through written word or images, face to face or verbal (e.g. by telephone) or via automatic messages if not universally applied to everyone. Specific examples include:-

- Personal threats, insults, suggestive comments or innuendos, inappropriate jokes or language.
- Physical conduct or contact, suggestive advances or gestures, practical jokes, display of offensive posters/photos.
- Deliberate isolation, exclusion, and non-co-operation at work.

- Suggestive comments or behaviour which indicate that favours could lead to advantage or reward or conversely refusal of favours could lead to punishment.
- Any other conduct which belittles, threatens, intimidates, or abuses, undermines or undervalues an individual because they perceive it that way.

2.3.5. Under the Equality Act 2010 it is unlawful, in employment and wider society, to harass someone on the grounds of: disability, age, sex, sexual orientation, race, religion or belief or gender reassignment.

2.3.6. **Victimisation** is when someone is treated less favourably as a result of being involved with a discrimination or harassment complaint, raising a grievance, because they are suspected of doing so or they intend to do so. This could include but is not limited to, being left out, not being allowed to do something or being labelled.

2.4. Governance and Compliance

2.4.1. Equality, Diversity, and Inclusion (EDI) is governed through the Force EDI Delivery Group chaired by the Head of EDI, which reports into the Legitimacy Board chaired by the Deputy Chief Constable. This governance system provides strategic decision making to support the EDI strategy and plan, and sets direction to ensure statutory responsibilities are met.

2.4.2. Whilst EDI is the responsibility of everyone in force, the delivery plan and strategy for EDI is owned by the Head of Equality, Diversity, and Inclusion. The EDI Team includes a Governance and Compliance Officer.

2.5. Equality Impact Assessments (EIAs)

2.5.1. Equality Impact assessments (EIAs) are an effective, evidence-based approach of making sure that new and existing policies, projects, services, and products do not discriminate. EIAs identify the people impact and allows for consideration and due regard of the Equality Act 2010 to be incorporated into every stage of product, service, and policy development.

EIAs add value in helping to create and deliver inclusive services that meet the needs of the public and our workforce. They avoid revisions, costly mistakes and enable better informed projects and procedures.

2.5.2. EIAs must be completed by the project, or service owner at the beginning of any new proposals or when reviewing policy. Those completing the assessments should refer to the guidance and templates on our intranet page [Equality impact assessments](#) and may find further useful information on the College of Policing website which contains guidance on Equality Impact Analysis. The EDI Team must be consulted on all EIAs to provide support and guidance, ensuring anything identified is fully considered and where possible mitigated.

2.5.3. Reviewing practices and procedures through EIAs ensures fairness and due regard to our PSED.

2.6 Positive Action

2.6.1. Used to describe the range of initiatives organisations are legitimately able to use to encourage under-represented people to join the police force and to help candidates overcome disadvantage experienced in selection. Under section 158 and 159 of the Equality Act 2010, any employer in England, Scotland and Wales can use positive action initiatives to help people who share protected characteristics overcome certain barriers and improve representation in the workforce.

2.6.2. Positive action does not mean discriminating in favour of under-represented groups when selecting for jobs or promotion. It means removing or redressing any potential discriminatory barriers, providing genuine equality of opportunity, and enabling people from all groups to stand a fair chance of competing for jobs or promotion on merit.

2.6.3. Positive action enables us to recruit and retain a wider pool of talented, skilled, and experienced people who represent and understand the needs of our diverse communities.

2.7. Equality Monitoring

- 2.7.1. The Force is committed to ensuring we are representative of our communities and supportive of individual needs through our services. To help understand our make-up and shape our existing and future services, we will actively monitor our workforce make-up, encouraging confidence in the recording of Protected Characteristics. Data will be kept anonymous, confidential, and secure by HR, but may be utilised anonymously to inform our work and build on our services, including through Positive Action.
- 2.7.2. We will take proactive steps to capture the voluntary equality data of our victims. This will help identify any disproportionality as well as the ability to tailor approach and support, thus making the force more accessible to victims with protected characteristics.

2.8. Disproportionality

- 2.8.1. Disproportionality means when a certain group of people is affected by action in a way that is substantially different from people that are not in that group.
- 2.8.2. Disproportionality regarding use of powers, complaints, vetting and fairness at work will be monitored through the Legitimacy Board using an 'Explain or Reform' approach. This will be monitored, not only by data but through use of our Independent Advisory Group, public scrutiny panels and internal scrutiny where applicable. Where disproportionality results from deliberate bias, it is unlawful.

2.9. Departmental Responsibilities

- 2.9.1. The force commitment to EDI is to ensure all our officers, staff, volunteers, and partners work in an environment that is without discrimination, harassment, or victimisation. This extends to our interactions with members of the public. It is therefore the responsibility of all departments, to ensure compliance with this policy and associated legislation within their areas of work. This includes, but is not limited to:

- Terms and conditions of employment

- Recruitment, progression, and retention
- Police use of powers
- Policy, process and decision making
- Training and development opportunities
- Vetting
- Fairness at Work complaints and Disciplinary
- Outcomes

2.10. Manager Responsibilities

- 2.10.1. Managers must always demonstrate the force values and promote Equality, Diversity, and Inclusion in their teams. Creating psychological safety and an inclusive culture, to make sure their teams work without discrimination, harassment, or victimisation. Managers will proactively and swiftly challenge and deal with any behaviours that fall outside of this policy in line with the Police Code of Ethics, the Police (Conduct) Regulations 2020 and Police Staff Standards of Professional Behaviour.

2.11. Individual Responsibilities

- 2.11.1. Creating an inclusive environment to ensure all our officers, staff, volunteers and partners work in an environment that is without discrimination, harassment, or victimisation requires individual responsibility. This includes understanding responsibilities, rights and liabilities within this policy and associated legislation. All officers, staff and volunteers must conduct themselves in a manner that supports the force to meet its EDI obligations in accordance with Police Code of Ethics and Standards of Professional Behaviour.

2.12. Reporting

- 2.12.1. Matters of discrimination, harassment and victimisation may be considered to be a breach of the standards of professional behaviour, which applies equally to Police Officers and Staff. All officers, staff and volunteers have a responsibility to report suspected breaches of professional standards by

others. Such matters will be subject to an internal investigation and may be dealt with either via the Fairness at Work procedure or, if appropriate, formal conduct procedures. Such matters can be reported to PSD or HR via one of the reporting mechanisms or confidential lines.

- Discuss with a trusted supervisor (this does not have to be your line manager)
- Speak to the Federation or Unison
- Speak to the Professional Standards Department
- Report on our confidential reporting system, Bad Apple. All information will be handled in the strictest confidence and can be made anonymously. Reports can be made via the confidential and untraceable email reporting facility Bad Apple or the Confidential Telephone Reporting Hotline on Ext: 8503
- Report to Crimestoppers Tel: 0800 555111
- Contact the Independent Office for Police Conduct (IOPC) reporting line Tel: 08458 770 061 / 0300 020 0096 or Email: reportline@policeconduct.gov.uk

2.13. Equality, Diversity and Inclusion Team

2.13.1 The EDI Team will support the force to meet its EDI obligations and EDI strategy. The team is made up of the following roles.

- Head of Equality Diversity and Inclusion
- Equality Diversity and Inclusion Officer - Governance & Compliance (shared role x2 officers)
- Skills and Knowledge Facilitator
- EDI Team Volunteer

3. Other related documents and appendices

3.1. Related documents

- [Equality, Diversity and Inclusion - Home](#)
- [Valuing diversity in recruitment | Lincolnshire Police \(lincs.police.uk\)](#)

- [Equality, diversity and inclusion | Lincolnshire Police \(lincs.police.uk\)](#)
- [Fairness at work procedure](#)
- [Professional standards reporting policy PD48](#)

4. Monitoring and review

- 4.1 The Equality, Diversity and Inclusion team will be responsible for monitoring and reviewing the policy. This Policy will be reviewed every 2 years or as necessary following any significant changes in legislation.

5. Who to contact about this policy

- 5.1. This policy is owned by Head of Equality, Diversity, and Inclusion (EDI). Any enquiries about this policy should be directed to Graeme Simpkin, Head of EDI on Graeme.simpkin@lincs.police.uk