Workplace Equality Index submission

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Policies and Benefits: Part 1

Section 1: Policies and Benefits

This section comprises of 7 questions and examines the policies and benefits the organisation has in place to support LGBT staff. The questions scrutinise policy audit process, policy content and communication. This section is worth 7.5% of your total score.

Below each question you can see guidance on content and evidence. At any point, you may save and exit the form using the buttons at the bottom of the page.

1.1 Does the organisation have an audit process to ensure relevant policies (for example, HR policies) are explicitly inclusive of same-sex couples and use gender neutral language?

GUIDANCE: The audit process should be systematic in its implementation across all relevant policies. Relevant policies include HR policies, for example leave policies.

Yes

Please describe the audit process:

State when the process last happened:	Policies are reviewed every 6 months by the HR Policy leads. Reviews took place between January 2019 and March 2019. The deadline of the next review is included too.
Describe the audit process:	The audit of policies is conducted through a Senior HR Leaders group, headed by the Director of HR and Organisational Change, which reviews, audits and potentially changes policies by following a thorough consultation process. HR, Trade Unions and other stakeholders i.e. Equality Diversity and Inclusion Centre (EDIC) and representatives from the Staff Networks e.g. the LGBTQ+ staff network as well as the Race and Disability staff networks and the Athena SWAN representatives are consulted during the development or review of a policy by the policy working group or the HR person responsible for developing the policy. There is a genuine commitment to ensure the policies contribute to the improved governance for LGBTQ+ staff and they have been adapted in response to staff feedback; by sharing the consultation across the range of staff networks. The final draft of the policy is then sent to

the Head of HR, Engagement Reward and Policy as well as the HR director for sign off and approval of the policy.

Policies are then reviewed on an ongoing basis at least biannually by the Head of HR Engagement, Reward and Policy. Review dates on all HR policies are included with the intent to review the policy well ahead of the next deadline. Should pending legal changes be anticipated, then a further review involving the legal team as well as the stakeholders mentioned above may be used.

Equality Impact Assessments (EIA's) are conducted on policies during reviews to assess their ongoing impact on all College staff. HR are provided with EIA templates and may enlist the help of the EDIC when reviewing policies. Equality Impact Assessment and guidance documents are available to HR; requests for training on how to conduct EIA's are scheduled into HR's Professional Development sessions. As part of the EIA process, the impact of policies on the College's LGBTQ+ staff are considered. Additionally certain Trade Union representatives who are part of the College's LGBTQ+ network, and the network's co-chairs are asked to look at the policies especially with the view to checking and enhancing inclusion and impact upon the College's LGBTQ+ staff.

At any time, any member of staff may contact their HR adviser if they wish to comment on, or seek advice on the application of a policy or have any other queries related to the policies. Where there are comments concerning the message conveyed by the policy, these will be escalated to the Head of HR Engagement, Reward and Policy for review.

The Adoption, Maternity, Parental Leave, and Trans Staff policies were sent to Stonewall for their review in June 2019. The Adoption, Maternity, Parental Leave policies have subsequently been updated following Stonewall's recommendations, and the Trans Staff policy is in the process of being updated.

Describe any previous outcomes of the audit process:	A trans policy for students has been drafted and will be implemented by the 2019/20 academic year.
	Other significant actions since the last Stonewall application and other audits include:
	The EDI Strategy was launched College wide in late 2018. Development of the strategy was based on wide consultation with staff and student representatives of the College community.
	The Online Equality Diversity and Inclusion training course is being updated.

	Online Unconscious Bias training is being developed with the aim of introducing it next term. The LGBT in house training has been replaced by an external provider, Challenge, who will also act as a consultant to the College on furthering LGBT Inclusion. A Sexual Harassment Working Group (https://www.imperial.ac.uk/equality/governance/sexual-harassment-working-group/) to reduce and prevent sexual harassment at the College has been convened. They consider LGBTQ+ issues and have worked together on the draft of the Sexual Harassment policy. A new Harassment and Bullying policy has also been drafted. Both of these policies are going to be implemented for the 2019/20 academic year. The Equality, Diversity and Inclusion Centre will implement sexual harassment training and will make explicit reference in the training to LGBTQ+ issues.

1.2 Does the organisation have a policy (or policies) which includes the following?

Tick all that apply

GUIDANCE: The policy/policies should clearly state that the organisation will not tolerate discrimination against employees on the grounds of sexual orientation, gender identity and/or trans identity. These may be listed along with other protected characteristics. The policy/policies should also demonstrate, through careful wording, a zero-tolerance approach to homophobic, biphobic and transphobic bullying and harassment. They should explicitly include examples of what homophobia, biphobia and transphobia in the workplace may look like.

A. Explicit ban on discrimination based on sexual orientation

B. Explicit ban on discrimination based on gender identity and gender expression

C. Explicit ban on bullying & harassment based on sexual orientation

D. Explicit ban on bullying & harassment based gender identity and gender expression

Name the policy and paste the relevant policy excerpt:

	Policy	Excerpt
		Disciplinary Policy: "Gross Misconduct. The following list (which is not exclusive or exhaustive) sets out offences are considered serious enough that they may warrant summary dismissal without prior formal warnings: • Serious discriminatory behaviour on

A. Explicit ban on discrimination based on sexual orientation	Disciplinary Policy and Respect for Others guide	the grounds of race, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief (including lack of belief), sexual orientation, disability, or age." Respect for Others guide: "The College also has a legal obligation to ensure all of its staff work in an environment free of discrimination, harassment, bullying and victimisation. The Equality Act of 2010 outlaws such behaviour if it is grounded in any of the following characteristics: • Age • Disability • Gender reassignment • Marriage and civil partnership • Pregnancy and maternity • Race • Religion or belief • Sex • Sexual orientation Imperial expects encouragement of inclusive participation and elimination of discrimination For all members of staff, promoting inclusive participation and eliminating discrimination means being aware of the College's policies and the law around equality and diversity. It requires a rejection of stereotypes or assumptions based on factors such as disability, gender, race or religion, and an approach to work that welcomes multiple voices and opinions."
		At Imperial, discrimination and harassment will not be tolerated on the grounds of gender reassignment or any other protected characteristics e.g. a trans person with a disability would be protected from discrimination on the grounds of disability and gender reassignment. Discrimination and harassment include: a) direct discrimination, where person A (who has the protected characteristic of

B. Explicit ban on discrimination based on gender identity and gender expression	Trans Staff Policy	gender reassignment) is treated less favourably than person B (who does not share that characteristic); b) direct discrimination by perception, where a person is perceived to have a protected characteristic (of gender reassignment) and is consequently treated less favourably. This applies even if the person does not have the gender reassignment characteristic; c) direct discrimination by association, where a person is directly discriminated against because of their association with another person who has the protected characteristic of gender reassignment and any other protected characteristics; d) indirect discrimination, where a policy, protocol or criterion that is neutral in its application to the majority of the population, has a detrimental effect on a person with the gender reassignment characteristic;
C. Explicit ban on bullying & harassment based on sexual orientation	Harassment and Bullying Policy	All forms of harassment, intentional or not, are covered by this policy and procedure. The following are examples of unacceptable behaviour. • Harassment on the grounds of actual or perceived sexual orientation can include homophobic remarks or jokes (whether spoken, written or sent by email), offensive comments relating to a person's sexuality, threats to disclose a person's sexuality to others or offensive behaviour/abuse relating to HIV or AIDS status. The College is legally responsible for ensuring that harassment or victimisation on the grounds of someone's race, sex, sexual orientation, religious belief [including lack of belief], gender reassignment, disability or age does not take place at work. Harassment can be a breach of criminal law, specifically the Criminal Justice and Public Order Act 1994 and the Prevention of Harassment Act 1997.
		Harassment and Bullying Policy: "All forms of harassment intentional or

D. Explicit ban on bullying & harassment based gender identity and gender expression	Harassment and Bullying Policy and Trans Staff Policy	not are covered by this policy and procedure. The following are examples of unacceptable behaviour. • Harassment on the grounds of gender reassignment can include jokes, name calling, humiliation, exclusion or being singled out for different treatment. The College is legally responsible for ensuring that harassment or victimisation on the grounds of someone's race, sex, sexual orientation, religious belief [including lack of belief], gender reassignment, disability or age does not take place at work. Harassment can be a breach of criminal law, specifically the Criminal Justice and Public Order Act 1994 and the Prevention of Harassment Act 1997." Trans Staff Policy: "Transphobic abuse, harassment or bullying (name-calling/derogatory jokes, unacceptable or unwanted behaviour, and intrusive questions) are serious disciplinary offences and will be dealt with under the appropriate procedure. Transphobic propaganda of any form, e.g. written materials, graffiti, music or speeches, will not be tolerated. The College will undertake to remove any such propaganda that appears on the premises."

1.3 Where the organisation has the following policies, do they explicitly state they are applicable to same-sex couples and use gender neutral language?

Tick all that apply

GUIDANCE: Where applicable, the policies should explicitly state that they apply to same-sex couples (or same-gender or non-heterosexual couples). Alternatively, they should explicitly state that they apply regardless of the gender of an employee's partner. The policies should avoid unnecessarily gendered language and pronouns, for example, by using the term 'partner' instead of 'husband' or 'wife' (as long as you have previously stated what constitutes a partner). It should be clear that parental leave policies apply to all employees, regardless of gender.

A. Adoption policy

B. Special or Compassionate Leave Policy

C. Maternity policy

D. Paternity policy

E. Shared Parental leave policy

Provide a brief description of the policy/policies you have uploaded:

A. The Adoption and Surrogacy policy grants leave to all staff intending to adopt a child, or become a parent through legal surrogacy arrangements.
B. The Special Leave policy outlines special leave provisions available to employees of the College.
C. The Maternity policy grants leave to all staff who are pregnant.
D. The Paternity/Maternity Support Leave policy outlines the provision of paternity/maternity support leave which is available to enable all members of staff whose partners are having a baby or are adopting a child to take time off to support their partner. Paternity/Maternity Support Leave is also available where a couple are jointly adopting, and the other member of the couple is taking Adoption/Surrogacy leave.
E. The Shared Parental leave policy grants leave to eligible parents so that they have the opportunity to choose to share between them the care of their child during the first year following the child's birth or adoption.

A. Upload the adoption policy

please be aware only **one** file is allowed per answer

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B. Upload the special or compassionate leave policy

please be aware only **one** file is allowed per answer

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C. Upload the maternity policy

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D. Upload the paternity policy

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E. Upload the shared parental leave policy

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Policies and Benefits: Part 2

Next Steps

1.4 Does the organisation have a policy (or policies) which support employees who are transitioning?   Yes

Does the policy (or policies) in place to support employees who are transitioning cover the following?

Tick all that apply

GUIDANCE: Evidence submitted should demonstrate how information around organisational support for people transitioning is tailored to different employee groups. For guidance on creating a transitioning at work policy, see Stonewall's resource here.

| A. Work related guidance for an employee who is transitioning |
| B. Work related guidance on the process for an employee to change their name and gender marker on workplace systems |
| C. Work related guidance for HR staff on how to support an employee who is transitioning |
| D. Work related guidance for managers on how to support an employee who is transitioning |
| E. Work related guidance for employees on how to support a colleague who is transitioning |

Provide a brief description of the policy/policies you have uploaded:

A. Guidance for employees who are transitioning has been developed to complement the policy and to assist employees on the practical steps needed to ensure their identity changes at the college.
B. The guidance for employees who are transitioning lets them know how to update their name and gender marker on workplace systems in Section 3.
C. The guidance for HR staff on how to support an employee who is transitioning details what they should do to change personal details on HR information systems.
D. The guidance for managers on how to support an employee who is transitioning offers information about how to shape the transition process with the employee's lead.
E. The guidance for supportive colleagues has information about personal pronouns, a helpful glossary of terms and tips on how to support trans colleagues.

A. Upload guidance for members of staff

please be aware only **one** file is allowed per answer

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B. Upload guidance for making changes on systems

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C. Upload guidance for HR staff

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D. Upload guidance for managers

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E. Upload guidance for colleagues

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1.5 Does the organisation have a policy (or policies) in place to support all trans employees, including people with non-binary identities? Yes

Does the policy (or policies) in place to support all trans employees, including people with non-binary identities cover the following?

Tick all that apply

GUIDANCE: Policies submitted should include clear information around how the organisation supports all trans employees, including non-binary people. Guidance on dress code should be offered regardless of whether an organisation has a uniform or dress code policy.

A. A clear commitment to supporting all trans people, including those with non-binary identities

B. Information on language, terminology and different trans identities

C. Guidance on facilities and dress code for non-binary people

Provide a brief description of the policy/policies you have uploaded:

The Trans Staff Policy describes in detail the commitment, background and processes in place to support our trans community. Details on the sections ticked off above are as follows:
A. Section 2 of the policy outlines Imperial's commitment to supporting all trans people including those with non-binary identities.
B. Section 2.1 of the policy introduces the language and identity differences.
C. Information on dress code and facilities is in sections 6.1 and 6.2 of the "Guidance for an employee who is transitioning".

Upload the policy and highlight content relevant to option A

please be aware only **one** file is allowed per answer

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Upload the policy and highlight content relevant to option B

please be aware only **one** file is allowed per answer

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Upload the policy and highlight content relevant to option C

please be aware only **one** file is allowed per answer

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1.6 In the past two years, has the organisation communicated that its policies are LGBT inclusive to all employees?

GUIDANCE: The communication uploaded should demonstrate the organisation has informed employees that policies are LGBT inclusive. This may be on a post on an intranet system, but any file or screenshot must demonstrate the reach of the communication.
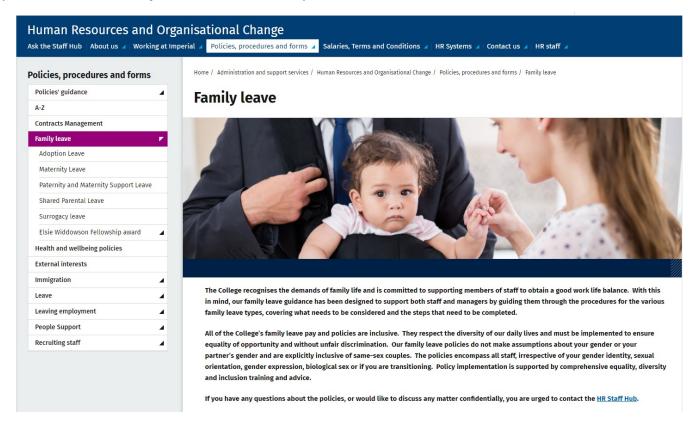
Yes

Provide a brief description of the communication you have uploaded:

The College's approach is to develop a supportive, inclusive community. To this end, communications about policy are inclusive of all protected characteristics. However, our webpages clearly state that family leave policies are inclusive of LGBTQ+ staff (https://www.imperial.ac.uk/human-resources/procedures/family/):

"All of the College's family leave pay and policies are inclusive. They respect the diversity of our daily lives and must be implemented to ensure equality of opportunity and without unfair discrimination. Our family leave policies do not make assumptions about your gender or your partner's gender and are explicitly inclusive of same-sex couples. The policies encompass all staff, irrespective of your gender identity, sexual orientation, gender expression, biological sex or if you are transitioning. Policy implementation is supported by comprehensive equality, diversity and inclusion training and advice."

Upload a communication from the past two years highlighting the relevant content:

please be aware only **one** file is allowed per answer

Provide the date that the communication was shared.   (No response)

The following question is for information gathering purposes only and is not scored.

1.7 Does the organisation provide its employees with private healthcare insurance which is explicitly inclusive of LGBT-specific health needs?

Yes

Describe how you ensure that the healthcare insurance is inclusive of all LGBT identities (and in particular, inclusive of trans people):

The College does not provide general private healthcare insurance; however, it does provide staff access to an NHS Dentist and Doctors service via the Imperial College Dentist and emergency treatment via the Imperial College NHS Trust. These services are advertised to all staff during induction and via College websites and inclusive of LGBTQ+ identities. The university offers travel insurance cover for all staff travelling on College business. This is offered to all staff including LGBTQ+ staff. The policies are LGBTQ+-friendly in that they will also cover accompanying "partners/spouses/dependents" (see http://www.imperial.ac.uk/staff-travel-and-expenses/frequently-asked-questions/insurance-faq/)