

Pre-meeting review

First area of focus:

Option 6: Policies and benefits

Stonewall feedback:

This section is aimed at ensuring you are laying the foundations for LGBT inclusion across your organisation by examining the policies and benefits that you have in place for LGBT staff. We are looking for explicit references to LGBT identities; gender-neutral language; and up-to-date terminology. We also want to see you providing benefits that support LGBT people to thrive in your workplace, including inclusive healthcare, gender-neutral facilities and clear provisions to support trans people, which can be outlined in a trans inclusion policy (including support for those who transition whilst in your employment).

Your process for ensuring that staff can feedback on the inclusiveness of policies is thorough and clear. It is good to see that your LGBT+ network was involved in reviewing your transitioning at work policy. We would like to see evidence that all relevant policies are scrutinised for their LGBT inclusivity.

Your Dignity at Work policy outlines a clear zero-tolerance approach to bullying, harassment and discrimination, and the attached FAQs explicitly reference sexual orientation and gender identity. You use the NHS Terms and Conditions' definition of harassment, which is good – until it refers to “men and women at work”. We would like to see you expanding upon this to include non-binary people. However, it is good to see you including examples of homophobic, biphobic and transphobic bullying and harassment. You also offer clear information on how to report incidents. Consider signposting to your staff networks as well as your EAP.

You use gender-neutral language throughout your Parents Policy (with one exception where you refer to ‘birth mother’ instead of ‘birth parent’). Consider defining ‘partner’ at the beginning of the policy and ensuring that this definition is inclusive (best practice language is ‘regardless of gender’ rather than ‘same-sex’). The inclusion statements in your Time Off Work policy are excellent, consider using these in your other policies.

Your Transgender Guidance is from 2014 and appears to be specifically for HR. Do you have a more up-to-date trans policy that you can share with us? If not, I would recommend updating this as a priority and ensuring it is relevant to all staff. Alternatively, you could expand your Transitioning at Work policy to include more general information about trans inclusion.

Your Transitioning at Work policy has some excellent content already, particularly the opening statement in which you are explicitly inclusive of all trans people. However, we would like more detail in several areas:

- You mention action plans for employees who are transitioning, but do not provide a template for this
- Your facilities guidance should have provisions for non-binary people - e.g. do you already have any gender-neutral facilities?

- At present your dress code reads “flexibility is required...while someone is early in transition”. This is true, but flexibility should always be required insofar as people should be able to interpret your dress code in a way that aligns with their gender identity, regardless of whether their identity is static or fluid, binary or non-binary
- We would like to see more robust leave provisions for individuals who transition at work. Transition-related absence should be recorded as special leave and should not count towards an individual's sickness absence record, nor should it be subject to normal absence processes such as disciplinary or capability
- You should provide guidance on the process for an employee to change their name and gender marker on workplace systems, including a checklist of all systems that need changing
- Instead of providing guidance for managers on how to support an employee who is transitioning, you signpost them to your LGBT+ network, other organisations and training. This is not sufficient: you should have written guidance available to all managers.
- You should also provide guidance for employees on how to support a colleague who is transitioning. This does not need to be as thorough as your managers guidance.

It is great to see your formal commitment to introducing gender-neutral facilities in any new builds. You will need to communicate this internally, including to your estates team, in order to be awarded marks. You should also provide detail about your current provision.

We would recommend scrutinising your mental health support provision for LGBT inclusivity. This could include your employee assistance programme, affiliated counselling services or internal mental health first aiders. Specific actions could include asking about a provider's LGBT-specific training for frontline employees.

We would also recommend reviewing other policies to ensure they are LGBT inclusive. This could include menopause or domestic abuse policies.

Finally, we would like to see your compassionate and/or special leave policies providing staff the same leave entitlements when it relates to chosen families as for biological or legal family members. We also want to see special leave provided to support family (including chosen family) through transition, for example by accompanying them to medical appointments.

Second area of focus:

Option 7: The employee lifecycle

Stonewall feedback:

This section examines the support you have in place for LGBT employees throughout key touchpoints in the employee journey, including recruitment, onboarding, training, progression and exit interviews. It also examines the inclusivity of your internal communications.

We would like to see you taking proactive steps to recruit LGBT talent. This could include advertising on or recruiting from LGBT or diversity websites (such as Proud Employers); including a statement around valuing diversity, explicitly inclusive of

LGBT people, in all job packs and pages; and including information about your LGBT employee network group or LGBT inclusion activities in all job packs and pages.

It is good to see that you provide recruitment training with an EDI focus. Make sure to remove gendered language (e.g. 'his or her full potential' should read 'their full potential'). We would also like to see LGBT-inclusive content, such as examples of discrimination on the basis of sexual orientation or gender identity and case studies of reducing bias and discrimination in the recruitment process. Best practice is to include a checklist of actions that recruitment staff can take, such as sharing their pronouns at the start of interviews, if they feel comfortable doing so.

You shared your mandatory all-staff D&I training for question 2.3, which examines the information that you supply to all new employees. This has some excellent content about your LGBT+ network. We would also like details about when the new starter receives this information – for example, is it part of the induction process?

Other information that we want to see you providing new starters includes an explicit message about the organisation's commitment to LGBT inclusion and information about relevant policies (e.g. your Dignity at Work policy) and your commitment to ensuring they are LGBT inclusive (e.g. through a regular review process including your staff networks).

It's good to see that you offer staff the option of selecting gender-neutral titles such as Mx. We would also like to see at least one example specific to gender fluid people (for example the ability to have multiple pass cards with different forms of gender expression).

It is great to see that your EDI training contains content about your Dignity at Work policy and within that your organizational approach to BHD. Your answer indicates that you know what else we are looking for! This includes examples of discrimination for LGBT+ people and for people who have multiple protected characteristics; information and challenging and reporting discrimination; and opportunities for feeding back on the inclusivity or representativeness of the training.

It was great to see you sharing such a wide range of internal communications relating to LGBT equality, including information about the importance of pronouns; your LGBT-inclusive policies; trans identities; and non-binary identities. Some of this evidence would sit better elsewhere within the index (e.g. your comms about allies could sit within section 4). We can only award marks for communications that have gone out to all employees, so unfortunately messages shared within your staff networks would not be awarded marks here. We would also like to see specific comms specifically about bi identities and experiences.

We would also recommend proactively recognising contributions to LGBT inclusion activity during staff performance appraisals. This should be systematic and applied to all performance appraisals, not just those of the network leads. This could be in the form of a clear question in appraisal forms/personal objectives and can link to your organisational values.

It is good to see that your exit surveys offer the opportunity to disclose incidents of

bullying or discrimination. Best practice would be to also ask about inclusion experiences beyond this, with explicit reference to LGBT inclusion.

It is great to hear that you will be updating your mental health and wellbeing strategy next year. Your account manager can work with you to ensure that this meets the specific needs of your LGBT staff.

Third area of focus:

Option 13: Community and sector engagement

Stonewall feedback:

In this section we are looking to see the ways in which you further LGBT inclusion through community engagement and engagement with your wider sector. Examples of this work can include supporting LGBT community groups such as Pride organisations, LGBT charities, LGBT youth groups or grassroots LGBT networks; using your social media accounts and online presence to demonstrate support for LGBT equality; supporting LGBT equality campaigns; and promoting LGBT equality within your sector, for example by collaborating with other organisations.

It was great to hear that NHSBT are leading on introducing an individualized risk assessment for blood donation for men who have sex with men. It looks like you ran out of time when completing this section, but if we have time in the session we can discuss your work in this area in more depth.