



# Draft Equality, Diversity and Inclusion Strategic Framework (2021-25)

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## Foreword

We are pleased to introduce our first Equality, Diversity and Inclusion (EDI) Strategic Framework 2021-25 which outlines our priorities for EDI going forward.

There is a great deal to be proud of at Nugent, we employ over 450 people, over 150 volunteers and are the largest education, health and social care charity in Liverpool. We offer a diverse range of support to vulnerable adults and children within the North West area through our schools, care homes, community and social work services and social enterprise. We choose to be the social welfare arm of the Catholic Archdiocese of Liverpool.

From a personal perspective, I am incredibly excited to put my name to this first strategic framework on EDI. I have relished the opportunities to see the EDI Assembly established and the Staff Forums begin their journey of development. My vision is that every employee, volunteer, and partner to be able to state with confidence that they are proud to be part of the Nugent family. My vision is for everyone that uses our services to believe that they are treated with fairness, dignity and respect throughout their journey with us and that they are in receipt of the very best care and education that the Nugent can offer them.

In 2020 the pandemic shone a global spotlight on pre-existing health inequalities affecting different communities including those with physical and mental health challenges. The murder of George Floyd increased our awareness about experiences of racism in our societies and led to a call for action. In addition, this year there has been an increase in hate crimes locally towards LGBTQIA+ people in the Merseyside area and we have witnessed national campaigns against gender-based violence. All of these issues have further reinforced the need for us to develop a strategy to secure EDI for our beneficiaries, staff, volunteers and the wider communities we serve.

Our focus on EDI recognises and values the differences in each of us. We believe that everyone has the right to be treated with dignity and respect. We want to create an inclusive culture that nurtures talent and allows every individual the opportunity to grow and reach their potential regardless of their background.

EDI must be at the heart of how we recruit, train, develop and retain our people. We live in and support a very diverse population and therefore we want Nugent to truly reflect the people that we support and the communities we serve. Our aim is to improve EDI capability across the organisation, we all have a role to play in this strategic framework and as the CEO of Nugent I am personally committed to supporting the implementation of this strategy and working to eliminate inequality and to make long-lasting improvements.

Our iACCORD values commit us all to improving the way we provide our services. In order to meet our vision of being dignified and outstanding, we must also be diverse, inclusive and equitable, therefore the achievement of the EDI Strategic Framework and our EDI Vision will require a collective effort from everyone across Nugent and our partners.

We have to reflect the communities and individuals we serve, otherwise we will not meet their needs. We need to go further to develop our understanding of our communities and we will do this by working in partnership.

This strategy is an integral part of our vision for the future and I am confident that, as a result, we will be better equipped to deliver our EDI aspirations.

I speak on behalf of the Trustees in saying that the EDI Strategic Framework is of fundamental importance to us as a charity and we'll be monitoring our progress regularly to ensure it is delivered.

**Normandie Wragg, CEO, Nugent**

## Introduction

At Nugent we recognise that structural inequalities exist in the workplace and as an organisation we are committed to improving equality, diversity and inclusion.

The Strategic Framework builds on some great work taking place across Nugent involving our staff influencing policy through newly formed staff forums and the EDI Assembly but there's still a long road ahead of us.

It does not stand alone; it links closely with Nugent's *Being Outstanding Strategic Plan 2020-25* and our guiding values.

Our approach to embedding EDI comprises two elements:

1. Delivering our commitments in the Being Outstanding Strategic Plan 2020-2025
2. Using this EDI Strategic Framework to guide our work

## The Purpose

The purpose of our EDI Strategic Framework is to outline how we drive systemic change, bring to life our pledges and remain committed to the values which support the implementation of the Being Outstanding Strategy 2020-25.

It describes how we deliver our compliance with equalities and human rights legislation and promote best practice. It also recognises that embracing EDI in the workplace broadens the mindset in Nugent and plays a key role in attracting and retaining talented and capable people. We are reliant on a mix of skills and experience across the charity, therefore, it's important that our employees feel valued, respected and empowered when they come to work.

Moreover, in order to provide outstanding and dignified services to our diverse beneficiaries we must have a strong commitment to ensuring they are understood, valued and respected regardless of their background.

This strategic framework envisions that everyone at Nugent, including Trustees, Executive Leadership, Senior Leadership, Managers, Team Leaders and staff groups will take direct responsibility for its implementation, recognising that promoting EDI is both an individual and collective responsibility and directly underpins our iACCORD values and our vision.

It is a framework that encompasses delivery of our internal workforce plans and our external policy work that impacts on our staff and our beneficiaries.

- **Part 1** sets out our approach, explaining practically how we deliver EDI in our work and aim to mainstream EDI in everything we do.
- **Part 2** explains how EDI is embedded in our strategy, including our EDI vision and priorities which will be reviewed annually.
- **Part 3** explains how we will monitor our EDI performance, and

- **Part 4** covers the law that underpins our work
- **Appendices:** Contain relevant pledges, statements and policies.

## Where did the EDI priorities come from?

Our EDI priorities have initially come from research, reports and guidance on developing EDI strategies in the workplace. This strategic framework will be further developed through feedback from our staff forums, and through an open consultation process.

Our priorities have also been influenced by a range of internal factors such as our strategic aims, our IACCORD values, diversity data and benchmarks, as well as the external environment and global issues such as Covid-19 and Black Lives Matter.

We will review whether the priorities are still suitable and relevant annually, and we plan to review our organisational progress against the priorities every quarter.

## Defining Equality, Diversity and Inclusion (EDI)

### **Equality**

Is about creating a fairer society where everyone can participate and has the same opportunity to fulfil their potential. Equality is backed by legislation (e.g., Equality Act 2010) designed to address unfair discrimination, harassment and victimisation.

### **Diversity**

Acknowledges and values the full range of differences between people both in the workplace and in wider society.

### **Inclusion**

Is about positively striving to meet the needs of different people and taking deliberate action to create environments where everyone feels respected and able to achieve their full potential.

### **Protected Characteristics**

Are age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation, marriage, and civil partnerships.

## Part 1: Our Approach

We've already started our EDI journey, so far it has been guided by our Equality, Diversity and Inclusion Assembly who have laid a foundation for us to build upon. The Head of People chairs the EDI Assembly and sponsors the EDI activities on behalf of the Executive Team.

The achievement of this Strategic Framework requires ongoing commitment and focus so that we continue to build a diverse and inclusive organisation which is reflective of the people we support and the community we serve.

In 2021, we revised the Nugent Strategic Plan to include cultural competence as a key priority. This work would weave through all of our themes and projects. This strategy was developed, an EDI Assembly was launched and six staff forums representing protected characteristics were established. We made an Anti -Racism and Inclusion Statement and Pledge and promised to do more.

To make a greater impact, we must broaden our EDI efforts by focusing upon multiple protected characteristics and approaches. There is more work to be done in shaping a fully inclusive environment and we want to renew our commitment to all elements of equality, diversity, and inclusion.

### Our Responsibilities

All colleagues at Nugent have a responsibility to promote equality, diversity and inclusion and to challenge unfairness and discrimination. A number of individuals and groups have additional responsibilities as outlined below.

#### **Head of People**

The role responsible for EDI is the Head of People who is accountable to the Chief Executive for ensuring adequate provisions are in place to deliver the EDI priorities via the EDI Framework.

The Head of People chairs the EDI Assembly and sponsors the EDI activities on behalf of the Executive Team. They also sponsor characteristics that do not have a dedicated senior sponsor.

#### **Heads**

Our Heads are responsible for compliance with equalities and human rights legislation. They sign off Equality Impact Assessments (EIAs) and EDI initiatives for their areas of responsibility.

Heads deliver the EDI priorities. Heads are expected to incorporate the EDI priorities into their business plans or service improvement plans. Heads are accountable to their appropriate Executive for ensuring adequate resources are in place to deliver the EDI priorities via the EDI Framework.

For example, they undertake EIA's on policies, processes and projects to ensure compliance with the Equality Act 2010 and any other relevant legislation, and monitor progress against the EDI actions in senior management and performance reporting meetings.

### **Senior management and line managers**

Senior management and line managers are responsible for the delivery of the EDI priorities and for understanding and raising the importance of EDI in their area of responsibility. They must undertake EIAs when developing new processes, policies or making significant changes. The EDI assembly will review EIAs.

In managing teams, they must carry out appraisals and provide feedback on how colleagues are doing their work in line with EDI principles and values.

### **EDI Assembly**

The EDI Assembly is a forum for sharing EDI best practice across the organisation. Its members are the Chairs of the staff forums.

The Staff forums consist of;

1. Rise (Racial Inclusion Staff Engagement) Forum
2. LGBTQIA+ Staff Forum
3. WIN (Women in Nugent Forum)
4. Staff with Disabilities Forum
5. Interfaith Forum

All forums are open to employees to join and attend meetings.

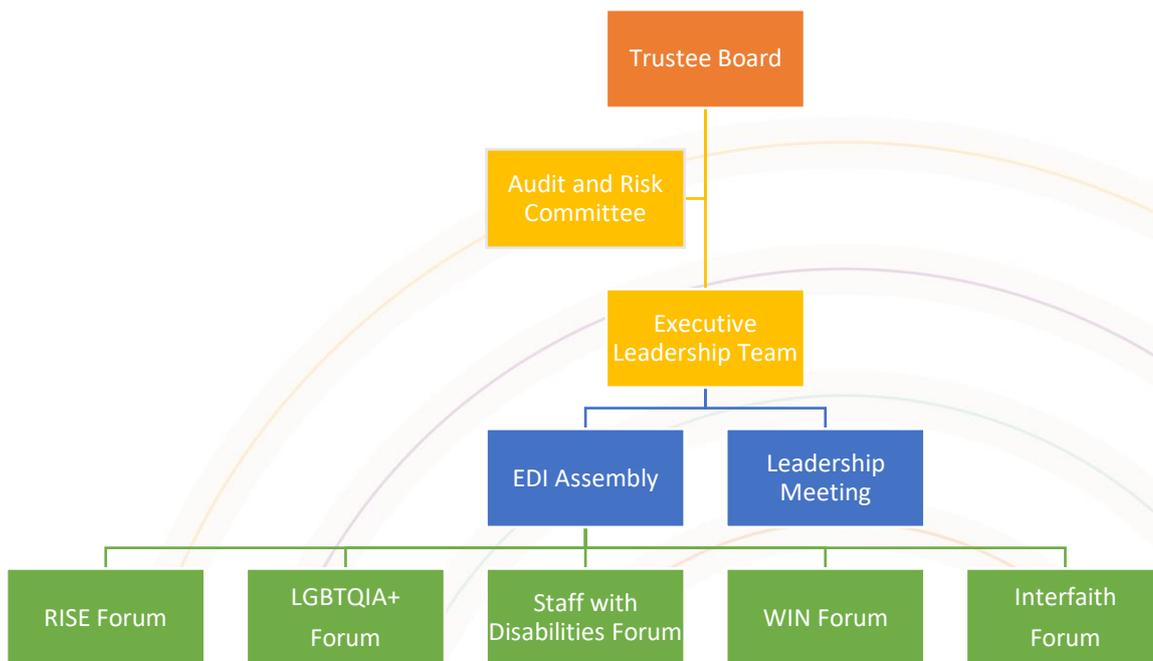
### **All employees**

All employees are responsible for the delivery of EDI and for compliance with equalities and human rights legislation. They are responsible for keeping their training and understanding of EDI up-to-date, and contributing to an inclusive working culture that celebrates the diversity of those using our services as well as our employees.

### **Trustees**

Trustees must be assured that the Nugent is compliant with equalities and human rights legislation in the decisions and information that the CEO presents to them. They should hold the Executives to account for placing EDI at the heart of all it does.

## EDI Governance Structure



## What we have achieved so far

### People and groups

- We have worked with independent EDI specialists to develop our learning around EDI
- We conducted a staff listening exercise/forum for staff who have been affected by racism due to the colour of their skin
- We established an EDI Assembly Co-Chaired by the Head of People and CEO.
- We established a series of Staff Forums which bring employees with shared characteristics such as gender, race, cultural heritage, sexual orientation, disability and allies together in a safe space. Our forums offer invaluable insight, they provide advice on policy, community and staff engagement. The activities of forums are generally aligned to the wider strategy, values and social goals of our charity.
- We recruited senior sponsors (for a protected characteristic) from our executive and senior leadership team who promote equality and awareness for a particular protected or personal characteristic. Where appropriate, they work closely with employee network groups that represent the characteristic they are sponsoring.
- We encouraged diversity allies to participate in this work. They do not have particular legal responsibility for compliance. They are people at any level in the organisation that promote EDI messages and work to raise awareness of and remove barriers that may be blocking achievement against EDI priorities.

- The EDI Nozbe group supports the delivery of the EDI priorities in line with equalities and human rights legislation and best practice. Some of the EDI Nozbe group activities include:
  - Providing advice and guidance to the business, shaping relevant policy;
  - Raising awareness of the key issues and priorities for equality, diversity and inclusion;
  - Working with communications and engagement teams to build relationships with diverse groups and communicate progress on EDI internally and externally.

### **Statements of intent/policy**

- We have a clear Nugent Anti-racism statement and Pledge that outlines our commitment to address racism
- We have an established an Equality and Diversity Policy and Procedure
- We have committed to developing an EDI Action Plan
- We are developing the 'Stand up for our Values' initiative which acts as an umbrella for a range of tools to promote positive behaviours and to equip and empower staff to challenge all forms of unacceptable behaviour in the workplace.
- We are developing 'The Nugent 'Code of Conduct' which sets our expectations and the behaviours that we encourage our community and all those that participate in any meeting/event/activity (virtual or physical) organised and/or delivered by Nugent.
- We look at EDI when preparing new policies and procedures through the use of Equality Impact Assessments (EIAs)

### **Management information and monitoring**

- We have employee baseline data on equality and diversity that enables us to look at trends and report progress

### **Learning and development**

- We regularly communicate our EDI activities and progress through Together Magazine, the Catholic Pictorial, In Focus and The CEO Update
- Equality, Diversity and Inclusion training is covered during induction
- We have begun to incorporate cultural dates into the calendar and social media and plan to celebrate Pride Month, Black History Month, Women's History Month and Disability Awareness Day amongst other dates throughout the year.
- We have rolled out Inclusive Leadership and Unconscious Bias training to our Trustees and Senior Leadership Team.

## Part 2: Our EDI Vision

To create an innovative and sustainable organisational culture that is truly inclusive where staff, volunteers and beneficiaries have a sense of belonging, feel valued for who they are and are supported to be the best they can be.

### Nugent EDI Statement

Nugent is a charity that provides education, health and social care services to those in need.

Promoting equality, diversity, and inclusion (EDI) is at the heart of our work and in line with our iACCORD values. We are on a journey to promote a spirit of positive progress and wellbeing that is central to this role. The people we care for, protect, educate and inspire come from all walks of life and so do we. We work with and care for people from a wide variety of backgrounds, not just because it's the right thing to do, but because it makes our charity stronger.

We value diversity in peoples, cultures, experiences, ideas, and aspirations. By recognising the benefits that different perspectives bring, we nurture personal ambition, encourage kindness and understanding, excellence and champion cultural competency across the charity.

Nugent's policy and commitments are fully supported by our staff, EDI Assembly and governance board and conform to our EDI Strategy and delivery plans.

Importantly, Nugent would like to promote 'Stand up for our Values' (to be developed) initiative which acts as an umbrella for a range of tools to promote positive behaviours and to equip and empower staff to challenge all forms of unacceptable behaviour in the workplace.

The Nugent 'Code of Conduct' sets our expectations and the behaviours that we encourage our community and all those that participate in any meeting/event/activity (virtual or physical) organised and/or delivered by Nugent.

We will set out an EDI action plan and this will be reviewed every year by our Governance Board.

## EDI Priorities

We have developed five overarching strategic priorities which we aim to deliver through this EDI Strategic Framework.

1. Be an inclusive place to work
2. Improve cultural competence of our leaders and the diversity of our teams
3. Promote a just culture for our staff and beneficiaries: To work in alignment with the Equality Act 2010 which protects characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex, and sexual orientation.
4. Support the health and well-being of our staff
5. Improve our EDI evidence base and extend our insight

### Priority 1: Be an inclusive place to work

We value the diversity of our workforce, and we will work to systematically identify and break down barriers to inclusion. We want to retain our talented people and ensure they can be themselves while at work.

As a minimum we will comply with our legal obligations, policies and commitments, for example on providing reasonable adjustments.

Theme	Outcomes
<p><b>We will work to systematically identify and break down barriers to inclusion.</b></p>	<p>Promote equality, fairness, and dignity to all our staff and beneficiaries and for each individual to feel valued, listened to, empowered and respected.</p>
	<p>Actively utilise our cultural calendar to commemorate special observances and heritage months; and promote engagement with the entire workforce.</p>
	<p>Establish and maintain partnerships with minority, disabled and other diverse professional organisations to help develop and maintain a pipeline of diverse internal candidates.</p>
	<p>Hold ourselves accountable at the highest levels and support our leaders</p>

	by providing leadership training and competence building opportunities for managing diverse teams.
	Promote EDI understanding for all, for example using internal communications, staff forums, training and senior sponsors to build a culture where people feel safe to be authentic and raise EDI issues where necessary. We will encourage discussions and dialogue about EDI as part of team meetings and briefings.
	Benchmark our progress using internal and external tools and resources

**Priority 2: Improve cultural competence of our leaders and diversity of our teams**

Culturally competent and diverse leaders will help us make fair decisions. There is well-established evidence that diversity in teams leads to better decisions and better financial performance. Our decisions-makers should understand and reflect the diversity of our staff, beneficiaries and stakeholders., beneficiaries and the public, and a priority action for us is to set relevant benchmarks for diversity and targets for improvement.

Theme	Outcomes
<b>Our decisions-makers should understand and reflect the diversity of our staff, beneficiaries and stakeholders.</b>	Our data to show we are moving towards these benchmarks at all levels of our workforce.
	Trustees and other leaders to be well-informed about EDI and able to speak to and challenge on EDI issues.
	Our recruitment processes to be fair and non-biased.
	We will support participation of all of our employees in our staff forums
	Increased visibility of diversity issues and campaigns that reinforces leadership commitment.

### Priority 3: Promote a just culture for our staff and beneficiaries

We want to get the best out of our people and equally support them so they are treated fairly. We recognise and comply with the relevant legislation; however, we want to strive beyond this to ensure that our practice in EDI is embedded in everything we do.

Theme	Outcomes
<p><b>Support our people so as they are treated fairly.</b></p>	<p>To work in alignment with the Equality Act 2010 which protects characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex, and sexual orientation.</p>
	<p>Provide mandatory entry level training and education to all staff on equality, diversity and inclusion matters.</p>
	<p>Offer opportunities for targeted discussions on issues related to diversity and inclusion, such as unconscious bias, disability inclusion and other critical topics that relate to the staff and beneficiary experience.</p>
	<p>To create a working environment free from bullying, harassment, victimisation and discrimination, and to provide confidential, safe communication channels through which concerns will be heard.</p>
	<p>Use an evidence-based approach to press for work and environments that are safe and healthy for all.</p>
	<p>Set standards that empower our staff and beneficiaries to challenge discrimination.</p>

	Act when concerns are raised about discriminatory behaviour our staff and beneficiaries.
	Share insights about disproportionality or discrimination with other organisations that are well-placed to act.
	Build an inclusive culture internally, acting on any evidence our employees are experiencing discrimination.

#### Priority 4: Support the health and wellbeing of Nugent Staff

Primarily we will focus on where our processes and services impact directly on the health and wellbeing of our staff and volunteers. For example, we will provide access for all staff and volunteers to a counselling service as part of our employee assistance programme.

Theme	Outcomes
<b>A focus on processes and services impact directly on the health and wellbeing of our staff and volunteers</b>	We will support the health and wellbeing of staff and volunteers in their education and practice. For example, communicating to our staff and volunteers on EDI topics such as mental health and menopause.
	We will seek to understand and use our influence to speak out about wellbeing issues facing education, health and social care staff – particularly if some groups are disproportionately facing these issues.
	We also recognise that the wellbeing of our employees is crucial and we will build a culture that encourages collaboration, fairness and flexibility to enable all colleagues to realise their potential.

## Priority 5: Improve our EDI evidence base and extend our insight

As we strive to create a fairer and more inclusive organisation it is important to understand the impact our plans, decisions and activities will have or have had on different groups of people. Analysing our data gives us the opportunity to address issues of underrepresentation in certain areas or roles. It gives indication to potential or actual bias and barriers facing our employees. The use of this data will also give us an understanding where we are currently and where we want to be in the future. We will present our data on an annual basis.

Theme	Outcomes
<b>Analysing our data to address issues of underrepresentation</b>	To continuously reflect on the meaning of diversity in our communities, to listen to all observations and feedback, and to react by discussing new ways to promote equality.
	Use the diversity data we hold about our staff and volunteers to monitor our regulatory activity for any evidence of different or disproportionate impacts on different groups.
	Improve our systems to ensure we have good quality diversity data and use it to provide intelligence about the diversity of our staff and volunteers.
	Assess and improve the diversity data we collect from our employees.
	Produce and publish an annual gender pay gap report which is published internally and externally with any additional actions identified and implemented as necessary.

**We also have evidence from other sources. We will monitor:**

The content and types of concerns raised by our staff and volunteers for EDI themes and issues in our charity.

External communications and complaints as these can inform our EDI priorities and help us measure progress.

Current and emerging external data about the experience of groups accessing education, health and social care services.

Insight from our membership bodies, such as CSAN, ICHA ACEVO, regulatory partners (Ofsted/CQC/Charity Commission) and other stakeholders which can inform our EDI work.

## Part 3: EDI Performance Monitoring

### Data

We will use our employee diversity data to measure our progress on increased recruitment, retention and progression of those from underrepresented groups. We will work together to agree a set of KPIs to measure our progress. We will compare our data to external sources to evidence how reflective we are of the communities we serve.

### EDI Action Plan

We will develop a robust EDI Action Plan incorporating feedback from the EDI Strategic Framework consultation and existing recommendations from the RISE Forum. Insights from the LGBTQIA+ Staff Forum, WIN (Women in Nugent Forum), Staff with Disabilities Forum & Interfaith Forum will be sought and incorporated. Progress against the action plan will be tracked regularly by the EDI Assembly.

### Employee Feedback

Our employee surveys will include EDI indicators which will give a baseline measurement and better understanding of employee experiences; therefore allowing us to find out if people feel that we are making progress.

### External Standards

We will build on our Disability Confident Employer status and explore the benefits of joining other external benchmarking frameworks.

## Part 4: The Law

The Equality Act 2010 contains measures which have direct implications for our functions and underpins the legal framework in which we operate. It informs our approach as a regulator and employer.

The Equality Act 2010 identifies nine protected characteristics. These are:

1. age
2. disability
3. gender reassignment
4. marriage and civil partnership
5. pregnancy and maternity
6. race
7. religion or belief
8. sex
9. sexual orientation

Although Equality Impact Assessments are not a legal requirement they are an important tool in demonstrating that we have considered our legal duties. The Human Rights Act 1998 protects people's human rights in the UK and enshrines the articles of the European Convention on Human Rights in British law.

### Closing comments

Supporting and overlapping our EDI Strategic Framework is the CEO's Anti-Racism Statement and Nugent's Pledge.

Our Equality, Diversity and Inclusion (EDI) Strategic Framework 2021-25 is a working document that will be reviewed on a regular basis to ensure that Nugent's EDI Priorities remain relevant and achievable.

This EDI strategy is aligned with our *Being Outstanding Strategy 2020-2025*. On an annual basis we will provide updates that include equality data as well as providing a summary of our progress in meeting our statutory duty and the priorities outlined in our strategic framework.

## Appendix A: CEO Anti Racism Statement

Nugent CEO July 2020

Over recent weeks there have been important conversations around the issue of race. Nugent, as an organisation whose mission it is to care, protect, educate and inspire people, must hold a mirror to itself and consider how it can learn, adapt, and evolve in response to these important issues, both internally and externally. We aim to have the courage to take a stand on inequality and be honest as to where we can improve.

Our values mean everything to us – we all deserve dignity and respect. Every human person, regardless of religion, culture, nationality, orientation or economic standing.

Each one of us is unique and beautiful. We are called to treat every person and every creature with loving respect and compassion.

I do not pretend to have the answers to these important issues, however, I am proactively listening, reading, watching, and self-reflecting, as well as acknowledging my privilege.

Personally, and in my role as CEO, I am being more vocal in highlighting issues of racism and inequality, and to support vital anti-racism work in opposing racism and promoting inclusion.

I ask you to join with me in supporting this vital work in the interest of human dignity.

Sincerely,

**Normandie Wragg, CEO**

## Appendix B: Nugent's Pledge

We need the ambition and optimism to look for a brighter future for all of our beneficiaries and staff.

We will start by:

- The amplification of Black or Asian or Ethnic Minority (BAME) voices\*. I will start by sharing the Catholic Association for Racial Justice's (CARJ) statement on the death of George Floyd, and in response to CARJ's recommendation will increase our equalities training to include anti-racism training for our staff, volunteers and Trustees.
- Supporting our Trustees in actively looking for BAME representation on the Trustee Board.
- I will support the development of a working group to openly and transparently discuss how we, as an organisation, can challenge our ways of working to be more inclusive and anti-racist; covering, but not limited to:
  - Convening an independent listening group and inviting interested staff to have a conversation on race. Following conversations and feedback with our staff, review this pledge to ensure that our pledge remains relevant
  - Ensuring that our recruitment and retention process are even more objective and further reduces risk of unconscious bias and discrimination
  - To set a pledge for Nugent to increase BAME representation in the organisation to match the ethnicity profile of the Liverpool City Region 13.8% \*\*
  - Reviewing our policies on inclusion, equalities and diversity
  - Review our services to identify where we could improve our offer, and culture to support our BAME beneficiaries
  - We will review our behaviour statement expectations, in line with our values, to actively include being anti-racist
  - Publishing an Inclusivity Statement on our website and publishing in all our HR processes
  - We will review our counselling provider to ensure that they are able to meet the emotional needs/wants of our BAME colleagues
  - Including further work on anti-racism through delivery of our services and education, through our Pathways and Partnerships element of our plan

- Convene workshops for managers and staff and on diversity, hate and religious crime. We will work with other individuals and providers, preferably local charities, who are experienced in providing this work
- We will conduct an Equality Audit on with our services and our charity, share the findings and respond to the recommendations
- Being transparent in learning from objective HR data on ethnicity within our charity and responding to our findings.
- Developing an Equalities, Diversity and Inclusion Strategy (race inclusion, age diversity, disability, gender equality, orientation, religion and belief)

\*Nugent recognises that there are many people from ethnic minority communities in the UK and from overseas who do not identify themselves as being Black or Asian or Ethnic Minority (BAME), but whom because their ethnic origin, language, culture or religious differences share a common experience of racial discrimination and inequality. We acknowledge the term BAME is limited, however we would encourage anyone who identifies with experiences of racial discrimination to take part in the listening sessions.

\*\*Data identified as of June 2020. Currently our ethnicity data demonstrates Nugent has 10% BAME representation based on available ethnicity 535 staff. 120 staff were not counted in this data due to no ethnicity data being available. The actual representational figures are expected to be lower due to other data not being available