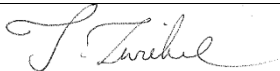


Sunbeams

EQUALITY AND DIVERSITY POLICY

Document Control Sheet

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Signature	

Revision History

Version	Date	Author	Description of Change	Approved By
1.0	Sep 2014	Admin	Initial release outlining equality and diversity principles.	Board of Trustees
2.0	Sep 2015	Admin	Review	Board of Trustees
3.0	Sep 2016	Admin	Review	Board of Trustees
4.0	Sep 2017	Admin	Minor update to accessibility wording.	Board of Trustees
5.0	Sep 2018	Admin	Review	Board of Trustees
6.0	Sep 2019	Admin	Review	Board of Trustees
7.0	Sep 2020	Admin	Minor terminology update.	Board of Trustees
8.0	Sep 2021	Admin	Review	Board of Trustees
9.0	Sep 2022	Admin	Review	Board of Trustees
10.0	Sep 2024	Admin	Review	Board of Trustees
11.0	Sep 2025	Admin	Comprehensive review; refreshed layout and strengthened EDI commitments.	Board of Trustees

1.Statement of Core Principles

The purpose of Sunbeams (London Ltd) is to provide mentoring and befriending services to vulnerable girls and young women between the ages of 5 and 16 within the Orthodox Jewish (OJ) community.

Under the Equality Act 2010, it is unlawful for organisations, while providing their services or in the treatment of their staff, to discriminate against people based on a "Protected Characteristic". The Protected Characteristics recognised by law are disability, gender reassignment, pregnancy or maternity, age, marriage or civil partnership, race, religion or belief, sex, or sexual orientation (Protected Characteristics). Protection from discrimination can also apply to a person who does not hold a Protected Characteristic, but is wrongly perceived to do so, or because they associate with someone who has a Protected Characteristic.

Sunbeams is committed to treating all human beings with equal dignity and respect, whether in its provision of services to the Orthodox Jewish community, or in its associations and dealings with the wider public.

Sunbeams recognises that people within the Orthodox Jewish community may experience discrimination because of additional Protected Characteristics (i.e. disability, gender reassignment, pregnancy or maternity, age, sex, or sexual orientation). Sunbeams are committed to promoting equal opportunities to all groups within the Orthodox Jewish community it serves.

2.Lawful exemptions (provision of goods and services)

In very limited circumstances, the Equality Act 2010 permits organisations to provide or restrict services to people with a particular Protected Characteristic. These circumstances are summarised in the attached Schedule. Sunbeams have reviewed the Schedule and taken specific legal advice in relation to the exemptions and Sunbeams work and is satisfied that it benefits from one or more of the lawful exemptions.

Equality and diversity in employment

Sunbeams embrace the principles of equal opportunities in employment. It aims to encourage, value and manage diversity and it recognises that talent and potential are distributed across the general population. Not only are there moral and social reasons for promoting equality of opportunity, but it is also in the best interest of this organisation to recruit and develop the best people for the job from as wide and diverse a pool of talent as possible. That diversity adds value and fosters strong links across different communities.

Sunbeams recognises that many people in society experience discrimination, which is defined below at paragraph 6.

All forms of discrimination are unacceptable, regardless of whether there was any intention to discriminate or not. All staff have a duty to co-operate with Sunbeams to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination. All staff should draw the attention of their line manager to suspected discriminatory acts or practices or cases of bullying or harassment

3. Equal Opportunities Statement

Sunbeams is committed to promoting equal opportunities for all staff and job applicants and to delivering fair and equal treatment in its provision of services. All staff, job applicants, service-users and the public will receive equal treatment, regardless of any Protected Characteristic, except in the limited circumstances permitted in law, as summarised in the attached Schedule. We will always seek legal advice before taking such action.

Sunbeams will not discriminate against staff, job applicants, service-users or members of the wider public based on any Protected Characteristic, except in the limited circumstances permitted in law, as summarised in the attached Schedule. We will always seek legal advice before taking such action.

This policy applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment. It also applies to Sunbeams provision of services to the community and in its dealings with the wide public.

4. Who is covered by the policy?

This policy covers all individuals working at all levels, including trustees (Directors), employees and volunteers (collectively referred to as staff in this policy). It also covers people Sunbeams meets through providing its services to the Orthodox Jewish community and to its dealings with the wider public.

All staff, including employees, consultants, workers, and volunteers must comply with this policy and must not unlawfully discriminate against or harass other people including current and former employees, job applicants, service-users, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts or when wearing a work uniform), and on work-related trips or events including social events. (Your attention is drawn to our separate anti-harassment and bullying policy.)

This policy does not form part of any member of staff's contract of employment and may be amended at any time.

5. Who is responsible for this policy?

Sunbeams' trustees have overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law. Day-to-day operational responsibility, including regular review of this policy, has been delegated to the Project Manager.

The Project Manager (R Ostreicher/C Stroli) will lead by example and ensure that all staff adhere to the policy and promote our aims and objectives regarding equal opportunities. She will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

Any questions about the content or application of this policy, or requests for training or further information should be addressed to the Project Manager.

6.Scope and purpose of the policy

This policy applies to all aspects of Sunbeam's relationship with staff and to all aspects of service delivery.

This policy applies to the all aspects of Sunbeam's employment-related activities, including job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

This policy also applies to all aspects of Sunbeam's provision of services to the community and its dealings with the wider community and public.

We will take appropriate steps to accommodate all requirements of different religions, cultures, and domestic responsibilities as they apply to our staff members. Please see the following for specific information on our approach to these issues: Flexible working policy, Holiday and Leave policy and observing the laws of Yichud in the workplace policy.

7.Forms of discrimination

Discrimination by or against a member of staff, or in the Charity's provision of services, is prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect, and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the Protected Characteristics above. For example, rejecting an applicant because of their race on the basis that they would not "fit in" would be direct discrimination.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same Protected Characteristic at a particular disadvantage. For example, a requirement to work full-time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Only permitting working people to pay for services by instalments would put pensioners at a disadvantage, as they are not "working". Such requirements will need to be objectively justified.

Harassment (in employment) related to any of the Protected Characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy. (In the provision of services, harassment related to any Protected Characteristic except for pregnancy and maternity, religion or belief or sexual orientation is prohibited. However, less favourable treatment because of pregnancy and maternity, religion or belief or sexual orientation may amount to direct

discrimination.)

Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

8. Recruitment and selection

We aim to ensure that no job applicant suffers discrimination because of any of the Protected Characteristics, except where there is a lawful exemption (for example a need to recruit a woman, where this constitutes a genuine occupational requirement. An example of a genuine occupational requirement might be the need to recruit a female counsellor to work with female victims of domestic abuse). In every instance legal advice will be sought. Our recruitment procedures are reviewed regularly to ensure that individuals are treated based on their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Shortlisting of applicants must be done by more than one person. Job advertisements should generally be advertised to a diverse section of the labour market and should avoid stereotyping or using wording that may discourage groups from applying.

Applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic, for example whether they are pregnant or planning to have children.

Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used on taking legal advice. For example:

Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).

Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.

Positive action to recruit disabled persons.

Equal opportunities monitoring (which will not form part of the decision-making process).

Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without taking prior legal advice.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from UK Visas and Immigration.

9. Staff training and promotion and conditions of service

Staff training needs will be identified through regular staff appraisals. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made based on merit.

Workforce composition and promotions will be regularly reviewed to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

All new staff and volunteers receive training on equality, diversity, and inclusion as part of their induction. This includes understanding protected characteristics, types of discrimination, and expected behaviours. Ongoing training is reviewed annually and delivered as needed to reflect updates in law or policy. Completion of equalities training is tracked through our internal training matrix and monitored by the Project Manager.

10. Termination of employment

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

11. Disability discrimination in Employment

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you are encouraged to discuss with your line manager any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager may wish to consult with you and your medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access

12. Part-time, Fixed-term and flexible work

Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis

where appropriate), unless different treatment is justified.

13. Service delivery

Sunbeams provides mentoring and befriending services to vulnerable children and young people between the ages of 5 and 16 and works to tackle discrimination and inequality in respect of the Orthodox Jewish community's access to wider services and information. Within this context, Sunbeams is committed to the pursuit of equal opportunities throughout the services offered. Sunbeams will work to implement this policy to ensure that no user of our services receives less favourable treatment on the grounds of any Protected Characteristic.

The Board of Trustees intends to ensure that equal opportunities in its service delivery are a reality in practice.

Sunbeams are committed to consult with service-users to ensure that our policies and work programmes are based on the expressed needs and wishes of our service users. We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access

Sunbeams encourage board-level participation from members of the Orthodox Jewish community. Appropriate training and information is available to members of the Orthodox Jewish community who need additional support to stand for election to the Board of Trustees and effectively participate in the Committee.

To assess the effectiveness of our equal opportunities policy, Sunbeams will monitor take-up of services, will identify which groups are and are not benefiting from its services, and to put in place positive measures to promote equality of access across different groups within the Orthodox Jewish community.

All staff and service-users should be made aware of this Policy.

This policy is implemented through induction training, staff briefings, service design, and regular team meetings. It is made available to all staff, volunteers, service users, and the public via our shared drive and on request. Staff are required to acknowledge they have read and understood the policy upon joining. Periodic refreshers and reminders ensure that the principles of equality and diversity are embedded in daily practice.

14. Purpose:

To ensure all individual staff, volunteers, service users, and particularly young people—understand how to report incidents of discrimination and what to expect in response.

15. Reporting Channels:

Staff may report incidents through the formal Grievance Procedure, which typically involves submitting a written grievance to the Project Manager or designated trustee. Adult Service Users (e.g. parents) and Public may report discrimination through the formal Complaints Procedure, either by email, letter, or using the organization's Complaints Form (available on request).

In all cases, the Discrimination Incident Form is used internally by staff to document and track incidents for safeguarding and reporting purposes. This ensures consistent recordkeeping regardless of how the concern is raised.

Young People (Under 18) may raise concerns informally with any staff member, who will log on to the issue and manage it sensitively following the informal resolution procedure.

16.Reporting Methods:

In-person conversation with a staff member.

Written statement or email to the Project Manager or safeguarding officer.

Completion of a Discrimination Incident Form (see attached template).

17.Investigation and Recording:

All incidents will be logged in a secure file maintained by the Project Manager.

Youth-related cases will be discussed confidentially within the safeguarding team and handled without confrontation or blame.

Reports are reviewed to determine appropriate responses, which may include informal resolutions, support meetings, or disciplinary steps.

18.Confidentiality and Protection:

All reports are treated with strict confidentiality.

Retaliation or victimization for reporting discrimination is strictly prohibited and will be treated as a serious disciplinary matter.

19.Breaches of this policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our disciplinary procedure. Serious cases of deliberate unlawful discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure or Complaints Procedure (depending on whether you are a member of staff or a service user). If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Anti-harassment Policy. If you are uncertain which applies or need advice on how to proceed, you should speak to the Project Manager. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

20.Monitoring and review of the policy

Sunbeams will undertake an annual Equality and Diversity Audit to ensure it is up-to-date and legally compliant. Recommendations for change should be reported to the Project Manager.

21. Schedule – Discrimination: Exceptions

Overview

This schedule explains the limited circumstances where the law allows Sunbeams to provide services or employ people in ways that focus on one group.

It is a summary of the law under the Equality Act 2010 and does not replace legal advice.

Sunbeams always seeks professional legal advice before applying any exception.

1. Exceptions in Employment

a. Occupational Requirement (OR)

Sometimes a job can be lawfully restricted to someone with a particular protected characteristic if it is essential for the role.

This is called an occupational requirement (OR).

Examples include:

Hiring a female mentor to work one-to-one with girls for cultural and safeguarding reasons.

Requiring staff to understand and uphold the Orthodox Jewish ethos of the charity.

An OR can only be used if it is a proportionate and necessary way to achieve a legitimate aim – for example, safeguarding, privacy, or maintaining trust within the community.

b. Employers with a Religious Ethos

Faith-based organisations such as Sunbeams may, in limited cases, require staff to share that faith or respect its values if this is essential for the nature of the work.

Again, this must always be proportionate and applied fairly.

22. Positive Action

The Equality Act allows positive action to help groups who are disadvantaged or under-represented.

This means Sunbeams can take fair, time-limited steps to improve inclusion or participation – not to favour one group over another.

Positive action is lawful when:

A group sharing a protected characteristic is at a clear disadvantage, under-represented, or has needs; and

The action taken is a reasonable and proportionate way to reduce that gap.

Examples:

Encouraging Orthodox Jewish girls with disabilities to apply for group mentoring because they are currently under-represented.

Offering additional training or support to help women progress into leadership roles.

Positive action must not become positive discrimination – decisions like recruitment or promotion must still be based on merit.

23. Exceptions in Service Delivery

Sometimes one group may need services designed specifically for them to achieve equal benefit.

The Equality Act allows this where it helps overcome disadvantage or meet different needs.

For Sunbeams, examples include:

Delivering mentoring solely for Orthodox Jewish girls, to overcome barriers of culture, language, or stigma.
Running female-only group sessions for privacy and wellbeing reasons.
The action must always be proportionate – suitable for the aim and no more restrictive than necessary.

24. Charity Exception

Charities are allowed to limit their services to people who share a protected characteristic if one of the following applies:

Test A – Tackling Disadvantage

The restriction exists to address a particular disadvantage or need linked to that characteristic.

Example: Sunbeams focuses on Orthodox Jewish girls to address the community's specific barriers to accessing mainstream mental health support.

Test B – Legitimate Aim

Even if not directly tackling disadvantage, the restriction can be justified if it is a fair, balanced, and necessary way to achieve a legitimate charitable purpose.

25. Membership and Religious Belief

Some charities or associations may restrict membership to people who share a particular belief.

This is permitted where:

The group has formal membership rules (25 + members), and

The restriction is based on religion or belief, not race or colour, and

The rule existed before 18 May 2005 (for historic charities).

Sunbeams do not currently operate restricted membership, but understanding this rule helps ensure future compliance.

26. Summary

Sunbeams apply these exemptions only when:

They are clearly justified under equality law.

They are the least restrictive means to achieve the aim; and

Legal advice has been obtained before doing so.

These provisions ensure Sunbeams can remain culturally appropriate and lawful while providing fair, respectful, and inclusive services.

We will continue to review the effectiveness of this policy to ensure it is achieving its objectives.

Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Project Manager.

Appendix 1: Informal Resolution Procedure for Youth Discrimination Concerns Overview

This procedure guides staff in managing discrimination issues involving children or young people (under 18) in a manner that is informal, supportive, and non-confrontational.

Step-by-Step Informal Process

Step 1: Listen Actively and Privately

Create a safe space for the young person to speak openly. Reassure them that they are being taken seriously.

Step 2: Record the Concern

Complete a brief entry on the Discrimination Incident Form (Appendix), outlining the situation in factual terms.

Step 3: Speak to Those Involved

Where appropriate, engage with other children or individuals involved to understand context and ensure clarity. Maintain a neutral, supportive tone and avoid blame.

Step 4: Resolution Through Understanding

Use restorative techniques and conversation to foster empathy and reinforce expectations of respectful behaviour.

Step 5: Update and Monitor

Follow up with the young person after a few days to confirm resolution. Document any further developments and notify the Project Manager.

Appendix 2: Discrimination Incident Form (Youth and Adults)
 [Confidential – to be filed with the Project Manager]

Section	Details
Date of Incident	
Location	
Person Reporting	Name, Age (if under 18), Contact Info
Who was involved?	(Names and roles if known)
Description of Incident	(What happened? Use direct quotes where possible.)
Was anyone else present?	(Witness names if applicable)
How did the person feel or react?	
Initial Actions Taken	(Conversation, support given, others informed)
Further Action Needed?	(e.g., investigation, mediation, safeguarding)
Staff Member Completing Form	Name, Role, Signature
Date Logged with Project Manager	