



Equality Diversity and Human Rights Policy

Version	001
Update Date	21 th October 2025
Review Date	20 th October 2025
Approved By	Richard Acheampong, Registered Manager and Nominated Individual

Equality Diversity and Human Rights Policy

CQC Fundamental Standards

Legislation	Details
Regulation 9: Person-Centred Care	Service users must have care and support which is tailored to them and meets their preferences and needs, including any needs related to protected characteristics as defined by the Equality Act 2010.
Regulation 10: Dignity and Respect	Service users must be treated with dignity and respect at all times while receiving care. This includes everybody being treated as equals.
Regulation 14: Meeting Nutritional and Hydration Needs	Require s service providers (where involved in the provision of food and drink) to ensure that the nutritional and hydration needs of service users are met, including the meeting of any reasonable requirements of a service user for food and hydration arising from the service user's preferences or their religious or cultural background.
Regulation 15: Premises and Equipment	Service users should be able to enter and exit premises easily and make their way around independently. If they can't, providers must make reasonable adjustments for disability/mobility issues in accordance with the Equality Act 2010 and other current legislation and guidance.

Key Questions, Quality Statements and I Statements

Key Question	I Statement	How this applies to Equality, Diversity and Human Rights
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Caring Kindness, compassion and dignity Treating people as individuals	I have care and support that enables me to live as I want to, seeing me as a unique person with skills, strengths and personal goals.	We treat our service users with kindness, empathy and compassion, and we respect their privacy and dignity. We treat colleagues from other organisations with kindness and respect. We treat people as individuals and ensure their care and support meets their needs and preferences. We consider their strengths, abilities, aspirations, culture, unique backgrounds, and protected characteristics.
Responsive Equity in experiences and outcomes	I am encouraged and enabled to feedback about my care in ways that work for me and I know how it was acted on.	We actively seek out and listen to information about people most likely to experience inequality in experience or outcomes and we tailor our care and support in response to this.
Well-Led Shared direction and culture Workforce equality, diversity and inclusion		We have a shared vision, strategy and culture. This is based on transparency, equity, equality and human rights, diversity and inclusion, engagement, and understanding challenges and the needs of people and our communities in order to meet these. We value diversity in our workforce and strive to create an inclusive and fair culture by improving equality and equity for our employees.

This Policy should be read in conjunction with our:

- Dignity and Respect Policy
- Commitment To and Upholding Of Human Rights Policy
- Provision of Non-Discriminatory Practice Policy
- Code of Conduct for Workers Policy
- Gender-Related Care Issues Policy
- Governance Policy
- Accessible Information Policy

- Mental Capacity and Deprivation of Liberty Policy
- Confidentiality of Service User's Information Policy
- Respecting Religion and Belief of Service Users Policy
- Disability and Discrimination Policy
- Supporting People With Learning Disabilities Policy
- Supporting People With Autism Policy
- Safeguarding Service Users From Abuse or Harm Policy
- Complaints Policy
- Disciplinary and Dismissal Process Policy
- Whistleblowing Policy
- Quality Assurance Policy

Relevant Legislation:

- Health and Social Care Act 2008
- The Equality Act 2010
- Accessible Information Standard 2016
- The Human Rights Act 1998
- Data Protection Act 2018
- The Disability Discrimination Act 1995
- The Sex Discrimination Act 1975
- The Care Act 2014
- The Mental Capacity Act 2005

Policy Statement

Our mission, vision, and strategic outcomes reflect our six core values that we believe define Primus Medical Ltd and all our employees. These are: Team, Compassion, Empowerment, Integrity, Innovation, Resilience. These core values provide a foundation and framework for all decision-making processes. We translate our values into actions, and they inspire everything we do and how we operate as a service. They are reflected in the policies, practices, and assessments we implement every day.

- 1 Primus Medical Ltd is committed to ensuring our supported living services and employment practices are accessible, inclusive and fair for the diverse communities we serve and the workforce we employ. This is reflected in our vision and values.
- 2 Primus Medical Ltd will aim to seek out and, wherever possible, remove obstacles which prevent people from receiving the best possible care or becoming the best that they can be, whether they are current or prospective employees.

- 3 Primus Medical Ltd adopts a zero-tolerance approach to discrimination in any form and at any time on the grounds of age, disability, sex, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, sexual orientation, religion or belief (all of which are covered by the Equality Act 2010). We are fully inclusive of all LGBTQ+ communities, including those with non-binary identities and trade union membership. This also includes political affiliation unless it could cause reputational damage.

Whilst this policy statement meets the requirements of the Equality Act 2010, Primus Medical Ltd believes that having specific policy aims is the right thing to do.

Policy Aims • To ensure that no person applying for a service will be refused on discriminatory grounds, e.g., because of their ethnicity, sexual orientation, etc., when they meet all other admission criteria. • To ensure that inferior or substandard services are not provided because of a person's ethnicity, sexual orientation or any grounds on which discrimination can occur. • Work out with each service user what they want and need and how they will be provided with the required service. This will be influenced by the individual's gender, culture, personal choices, and other characteristics, and it should not be assumed that everyone wants the same thing. • We will make specific, practical adjustments for people with learning disabilities, autism, and mental-health needs, and we will record and review these with the service user as necessary. • To encourage service users and staff to relate to one another on the basis of equality and respect for individual differences. • To develop an attitude of self-awareness among staff and service users to ensure that any form of discriminatory behaviour, such as offensive or abusive language, does not occur and to communicate that it is unacceptable in whatever form it might take and from whatever person. • To ensure that service users and staff are continuously aware of the procedures for dealing with complaints and allegations of discriminatory or oppressive language or behaviour. • Ensure that all complaints and allegations are addressed properly and in non-discriminatory ways. This policy applies to all employees, volunteers, and contractors within Primus Medical Ltd. The registered manager, is responsible for ensuring the implementation of this policy with Primus Medical Ltd.

Key Question: What does Equality, Diversity and Human Rights mean?

Equality, diversity, and human rights mean that every service user's individual needs are comprehensively addressed. They will be treated equally and without discrimination. This is regardless of the individual's ethnic background, language, culture, faith, gender, age, sexual orientation or any other aspect that could result in their being discriminated against purely because they have such characteristics. Primus Medical Ltd aims to celebrate differences (ethnic background, etc.) between individuals and avoid treating people unequally. Primus Medical Ltd recognises that treating people unequally can result in their losing their dignity, respect, self-esteem self-worth and ability to make choices.

Primus Medical Ltd does not assume that equality, diversity and human rights principles and policies apply only to the service's staff. Service users must also respect their ethnicity, culture, religion, gender and any staff disabilities and not discriminate against them on any of these grounds when expressing their views and preferences.

Primus Medical Ltd makes clear that any form of racist and similar discriminatory behaviour from any source is unacceptable. Primus Medical Ltd also builds these policies into its external contractual relationships.

The Equality Act 2010

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It brought together previous anti-discrimination laws into a single act to strengthen the protection of some groups and make the law easier to understand.

Primus Medical Ltd understands that providers must fully comply with the requirements of the Equality Act 2010. We aim to do so by recognising and committing to our legal duties under this act.

Protection from discrimination:

Primus Medical Ltd recognises that everyone should be protected from discrimination based on the nine key protected characteristics:

- 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

Unlawful discrimination

Primus Medical Ltd is aware of the different types of discrimination and will ensure that all staff are trained to recognise these:

- **Direct discrimination** - treating one person worse than another because of a protected characteristic.
- **Indirect discrimination**- a rule, policy, or way of doing things that applies in the same way to everybody but disadvantages a group of people who share a protected characteristic.
- **Harassment** - unwanted conduct related to a protected characteristic that has the purpose or effect of violating someone's dignity or that creates a hostile, degrading, humiliating, or offensive environment for someone with a protected characteristic.
- **Victimisation** - treating someone unfavourably because they have taken (or might be taking) action under the Equality Act or supporting somebody who is.
- **Failure to make reasonable adjustments** - where an organisation unreasonably doesn't change the way things are done, the physical features of a space or provide aids so that a disabled person is no longer substantially disadvantaged.

The Accessible Information Standard

The Accessible Information Standard aims to establish a framework so that individuals receiving care who have information or communication needs relating to a disability or sensory loss receive:

- 'Accessible information' ('information which is able to be read or received and understood by the individual or group for which it is intended'); and
- 'Communication support' ('support which is needed to enable effective, accurate dialogue between a professional and a service user to take place').

This ensures that individuals can access services appropriately and independently and make decisions about their health, well-being, care and support.

How Primus Medical Ltd aims to adhere to the Accessible Information Standard Framework:

- If service users have any information or communication needs, these will be addressed clearly in their care plan and a plan for accommodating these needs will be made. All staff will be made aware of this to ensure these needs are considered in all aspects of their care.
- Primus Medical Ltd will inform third parties of service users' information and communication needs when necessary and with the service user's consent.

- Primus Medical Ltd will ensure that service users receive information that they can access and understand and that they receive communication support if they need it.

Commitment to Equality, Diversity and Human Rights

Primus Medical Ltd expresses its commitment to equality, diversity and human rights by:

- ensuring that our services and functions do not unlawfully discriminate against people on the grounds of any of the Equality Act 2010 protected characteristics,
- respecting service users' ethnic, cultural and religious practices and how these may relate to care needs,
- involving service users to express their individuality and to follow their preferred lifestyle, also helping them to celebrate events, anniversaries or festivals which are important to them as individuals,
- promoting a culture of dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued,
- promoting equality, diversity and human rights in the workplace as they make good business sense and can be shown to improve service user experience and outcomes,
- facilitating a culture of advancing equality and fostering good relations at every opportunity,
- training managers and raising awareness amongst other employees about their rights and responsibilities under this policy statement,
- having a code of conduct that makes any form of discriminatory behaviour unacceptable; this is applicable to both staff and service users,
- the registered manager, , will monitor all our policies and practices to ensure we are eliminating all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and disciplinary, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities,
- ensuring that all of our technology (including telephone systems and online/digital services) are accessible for all service users and making reasonable adjustments when necessary,
- we will check understanding (not just provide information), using Easy Read or visual formats where preferred,
- creating a workplace free of bullying, harassment, victimisation and unlawful discrimination. Such acts will be dealt with as misconduct under Primus Medical Ltd's disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Responsibilities

- All staff have a duty to conduct themselves in a manner which is consistent with Primus Medical Ltd's Values and Behavioural Framework. This will assist Primus Medical Ltd to provide fairness and inclusion in employment, and prevent bullying, harassment, and victimisation.
- All staff should understand that they and their employers can be held liable for bullying, harassment, victimisation, and unlawful discrimination against fellow employees, service users, contractors, and the public during the course of their employment.
- All Primus Medical Ltd managers and supervisors are responsible for implementing and adhering to the policy statement.

Disability

Employees:

- Employees are encouraged to discuss with the registered manager and the human resource manager if they have a disability or a long-term health condition that may impact their day-to-day work.
- A discussion should take place in relation to any 'reasonable' adjustments to their employment or working conditions which they consider to be necessary or which they consider would assist them in the performance of their day-to-day duties.
- Primus Medical Ltd has in place a Reasonable Adjustments Guidance that provides information and support to both managers and employees regarding the reasonable adjustment process.
- Primus Medical Ltd also has a Health Passport, which has been designed for individuals within Primus Medical Ltd who are living with a disability, long-term health condition, mental health issue or learning disability/difficulty. It allows individuals to easily record information about their condition, any reasonable adjustments they may have in place and any difficulties they face in the workplace.

Service users:

Primus Medical Ltd will ensure that it:

- **Has fair Assessment Process:** we use a transparent and unbiased assessment process for all prospective service users. Each individual will be evaluated based on their care needs and not on factors such as disability.
- **Person-Centered Approach:** we will engage with potential service users and their families in an open, respectful dialogue to understand their specific requirements. We will take into account any disabilities when determining how we can best meet their needs

Learning disabilities and autism (service users and employees)

At Primus Medical Ltd, we record each employee's and service user's preferred communication methods and relevant needs from the outset. We are committed to keeping this information current and treating reasonable adjustments as standard practice.

In practice, we ensure communication is accessible and inclusive by offering information in various formats (such as Easy Read and visual aids), confirming understanding, and adapting our approach, for example, by using clear language, asking one question at a time, and allowing extra processing time. We also work to reduce sensory overload, providing quiet spaces where needed.

For service users, we respect individual routines and interests and support decision-making in line with the Mental Capacity Act, using best-interest processes only when necessary. Adjustments are co-produced with people with lived experience and, where appropriate, with families or advocates. When distress arises, we use de-escalation techniques that prioritise dignity and understanding.

For employees, we may provide structured support such as step-by-step guides, noise-reducing tools, predictable routines, and inclusive recruitment options (e.g. advance interview questions or work trials). Induction includes learning disability and autism (LDA) awareness and practical communication skills, with role-specific refreshers to build confidence in using communication aids and de-escalation techniques.

Mental Health and Wellbeing[please edit or remove as applicable to your service]

With the individual's consent, mental health needs and preferred strategies will be recorded at the outset, with agreed adjustments clearly documented and kept under regular review. This ensures that support remains relevant and responsive to changing circumstances.

For service users, we co-create a concise Crisis Plan, with their consent, that outlines early warning signs, helpful responses, preferred de-escalation techniques, and key contacts; this plan is reviewed collaboratively to ensure it reflects the person's voice and evolving needs. Staff are encouraged to use these plans actively in day-to-day support, ensuring early intervention and consistent, compassionate responses to distress. We also explain confidentiality and its limits with regards to safeguarding.

For employees, agreed adjustments may include flexible working hours, clear priority-setting, regular one-to-one meetings, and peer or buddying support. Following any incidents or challenging events, staff are offered timely debriefs and supportive check-ins.

Induction includes mental health awareness, guidance on using Crisis Plans, and practical skills for maintaining wellbeing at work. Managers receive additional training on conducting sensitive adjustment meetings and signposting internal and external support. Annual refreshers cover early signs of deterioration, professional boundaries, and confidentiality principles.

Upholding service user's human rights

The Human Rights Act 1998

The Human Rights Act gives people legal protection over certain essential rights, such as the right to a fair trial, the right to vote, the right to privacy and the right to life. There are 16 human rights in total and they are referred to within the act as 'articles'. Everyone in the UK is protected under the Human Rights Act, and providers are responsible for ensuring these are upheld in the provision of services.

What are human rights?

Primus Medical Ltd understands that all service users have, among others, the following rights.

- 1 Right to dignity and respect.
- 2 Protection from abuse or maltreatment.
- 3 Right to choose how they want to be addressed.
- 4 To be treated as an individual.
- 5 To have access to a range of statutory and specialist services.
- 6 To choose what they want to eat or drink and where they want to eat or drink it.
- 7 To have access to an advocate if they are unable to express themselves.
- 8 To have privacy in their own accommodation.
- 9 To have any changes in their living arrangements discussed with them and agreed upon first.
- 10 To be able to suggest improvements.
- 11 To have visitors of their own choice.
- 12 To have a clear and fair service agreement.
- 13 To register and vote in elections.
- 14 To manage their own money.
- 15 To mix with the local community.
- 16 To choose their own GP and dentist.
- 17 To be independent without unnecessary or unjust restrictions on movement.
- 18 To choose to take risks that they consider acceptable.
- 19 To have their cultural and religious views, beliefs and needs respected.

All staff are expected to protect and uphold the above rights of service users at all times or to facilitate access to any available advocacy services wherever service users wish for representation but lack the capacity to seek representation for themselves.

How Primus Medical Ltd will uphold human rights

Primus Medical Ltd is committed to upholding the human rights of service users and will do so in a number of ways, including:

- Involving service users in all decisions about their care and support.
- Being transparent with service users about the use of their personal data and allowing them to access these records at all times.
- Always following the best practice guidance and the relevant deprivation of liberty safeguards as set out in the Mental Capacity Act.
- Providing advocacy services for service users who lack the capacity to seek representation for themselves.

Service users' information

Primus Medical Ltd will only share information when necessary and with the explicit consent of the service user or their legal representative, ensuring that their dignity and rights are always upheld. We aim to support the diverse needs of each individual while ensuring that everyone's privacy is respected. Information is continuously updated to reflect any changes in the service user's circumstances, care plan, or preferences to ensure that they are always receiving high-quality care.

When information would be shared with other providers or organisations

In the following cases, we ensure that only the minimum necessary information is disclosed and that the service user's privacy is protected at all times:

- When necessary for the effective coordination of care, such as when referring a service user to a specialist, we share relevant information with the service user's consent.
- We may share information as required by law or the CQC, such as during audits or investigations.
- In emergency situations where a service user's health or safety is at risk, we may share information with relevant parties to provide immediate assistance or medical intervention.

Recording Service User's Information

Primus Medical Ltd records service user's information in the following ways:

- **Baseline assessment of needs** - this is completed for all new service users and records key information that enables us to assess how we can best provide care.
- **Care plans**- care plans record service user's specific needs, preferences, medical conditions and our plans for meeting those needs.
- **Monitoring forms**- these are used to record daily care activities, progress and changes to a service user's health and wellbeing.

- **Communication notes** - these are used to document important interactions and observations between staff and service users.

Complaints and Allegations

Any existing or prospective service user who believes they have been treated unfairly or discriminated against by a member of staff or Primus Medical Ltd as an organisation is encouraged to make a complaint directly to the Registered Manager or via a relevant on-duty staff member. Complaints can be made in person, over the phone, or by email/written letter. We will provide accessible routes (e.g., Easy Read, pictorial forms) and support persons for people with LDA or mental-health needs. All complaints and allegations will be treated seriously and addressed promptly as per our Complaints Policy.

Upon receiving a formal complaint or allegation of discrimination, Primus Medical Ltd will conduct a full, impartial investigation, including interviews with the complainant, the alleged perpetrator, and anyone else who may be involved. Staff members who have been accused of misconduct may be temporarily suspended from duty as a protective measure and to facilitate the investigation process. Where the investigation suggests there is a case to answer, a disciplinary hearing will be held in which the accused staff member, the complainant, and any witnesses/other concerned parties will be asked to state their case and a decision reached. Depending on the outcome of the hearing, the staff member may be dismissed, referred to the Disclosure & Barring Service barred list, and/or subject to legal proceedings if they have behaved unlawfully. Full details of this process are included in the Disciplinary Policy.

In line with our safeguarding duties, Primus Medical Ltd employees are expected to maintain a general awareness of the conduct of their coworkers, and to inform the Registered Manager if they believe that another staff member is not acting in accordance with the Equality, Diversity and Human Rights Policy. Employees who raise concerns about other members of staff are protected from any reprisal or punishment as a result of doing so. For more information on whistleblowers' rights, see the Whistleblowing Policy.

Training

All staff are trained to follow Primus Medical Ltd's Equality, Diversity and Human Rights Policy and to know their legal obligations under the Equality Act 2010.

Where practical and appropriate, our training programmes will be produced in consultation with people from the relevant protected/minority groups to ensure they are fully representative and champion the voices of those who are most affected.

All training is regularly monitored and updated.

Workforce Monitoring

Primus Medical Ltd will monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability. This is to encourage equality and diversity and ensure that we are meeting the aims and

commitments set out in the People Strategy. This will include publishing and reporting a range of our workforce data in line with our legal and contractual obligations.

Monitoring will also include assessing how Primus Medical Ltd's People Strategy, and any supporting action plans e.g. Workforce Race Equality Standards, are working in practice, reviewing them annually, and taking action to address any issues and gaps.

Primus Medical Ltd will review employment practices and procedures when necessary to ensure fairness, and also update them and the policy accordingly to take account of changes in the law.

Implementation Plan

The policy will be communicated widely across Primus Medical Ltd, including policy approval via Primus Medical Ltd's governance process.

Compliance and Governance

- All staff can read details of Primus Medical Ltd's grievance and disciplinary policies and procedures.
- Details of Primus Medical Ltd's complaints procedure will be widely publicised on our website, .
- Where it is highlighted that there are actions required to address detrimental impact on protected groups, whether this be through discussion or action plans, these will be noted in the minutes of the Senior Management Team meetings and will be reviewed at subsequent meetings.

Monitoring and Review

The Registered Manager will check this Policy is working properly and they will review it at least once a year. We will make improvements to the Policy wherever we can.

Employees are invited to suggest any ways the Policy can be improved.

This Policy does not form part of any employee's contract of employment, and it may be amended at any time.

After reading this Policy, you should be able to:

- Understand the importance of equality, diversity and human rights.
- Understand how the Equality Diversity and Human Rights Policy operates at Primus Medical Ltd and have an awareness of the actions we take in preventing, identifying and reporting concerns.
- Understand the role you play in the Equality Diversity and Human Rights Policy.

If you have not understood any of these points, please ask your Line Manager or trainer for further help.

Authorisation and Signature

This Policy is the authorised version agreed by the Directors of Primus Medical Ltd.

All employees are expected to follow this Policy and failure to do so could result in disciplinary action.