Equality, Diversity, and Inclusion (EDI) Policy
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Inclusion Statement

Priory Medical Group (PMG) believes strongly in the power and importance of inclusion. We want our service users, carers, staff, and partner organisations to be able to access our services, buildings, information, and communications in ways that are most appropriate to their individual needs. This includes proactively identifying and removing barriers to access, both in patient services and within our workplace, ensuring everyone is supported to participate fully and equitably.

1. Purpose

Priory Medical Group is committed to fostering a culture of equality, diversity, and inclusion across all areas of its work. This policy sets out the principles and standards to ensure:

- Fair treatment of patients, staff, and visitors.
- Equitable access to healthcare services for a diverse patient population.
- A safe and supportive workplace for all employees.
- Compliance with the Equality Act 2010 and NHS guidance.

This policy recognises the wide-ranging responsibilities of an NHS employer and seeks to actively reduce health inequalities while valuing the diverse contributions of all staff.

In recognition of the importance of health and digital literacy, this policy incorporates evidence-based strategies to ensure disadvantaged groups can access and understand health information effectively, thereby reducing disparities in care.

2. Scope

This policy applies to:

- All staff, including permanent, temporary, locum, bank, and agency staff, trainees, volunteers, and contractors.
- All patients, carers, and visitors.
- Recruitment, employment practices, patient care, service delivery, workplace culture, and engagement with the local community.

3. Legal and Regulatory Framework

This policy aligns with:

- Equality Act 2010, protecting individuals from discrimination based on protected characteristics.
- NHS Constitution, including the commitment to equality of access and employment fairness.
- Relevant NHS England guidance on workforce diversity, inclusive care, and reducing health inequalities.
- Care Quality Commission (CQC) requirements for promoting equality and diversity in service delivery.

Protected characteristics include age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex, sexual orientation.

4. Policy Statement

Priory Medical Group actively promotes equality, values diversity, and fosters inclusion in all areas of the practice. Our core commitments include:

- Ensuring that all patients receive fair and equitable treatment, regardless of background.
- Promoting an inclusive culture in which staff feel valued and supported.
- Removing barriers that may prevent participation, career development, or access to services.
- Ensuring discrimination, harassment, or victimisation is never tolerated.

The practice recognises that diversity improves patient care, staff engagement, and organisational performance, and we strive to embed EDI into all policies, procedures, and daily operations.

5. Principles of Equality, Diversity, and Inclusion

5.1 Patient Care

- All patients will be treated fairly and with dignity.
- Staff must recognise and accommodate cultural, linguistic, religious, and accessibility needs.
- Patients from marginalised or vulnerable groups will be supported to access services.

- Monitoring patient feedback, complaints, and health outcomes will identify inequalities and inform improvements.
- Health and digital literacy initiatives will be integrated to empower patients to access, understand, and make informed decisions about their care.

5.2 Workforce and Recruitment

- Recruitment, selection, promotion, and training processes will be fair, transparent, and inclusive.
- Job adverts and descriptions will encourage applications from underrepresented groups.
- Career development opportunities will be accessible to all staff.
- Flexible working, reasonable adjustments, and carer support will be considered to meet individual needs.
- Staff will receive training on communicating effectively with patients who have low health or digital literacy.

5.3 Workplace Culture

- A zero-tolerance approach to discrimination, harassment, bullying, and victimisation from patients and staff alike.
- Staff will be encouraged to report concerns or breaches without fear of retaliation.
- EDI training, including unconscious bias and cultural competence, will be mandatory.
- Reasonable adjustments will be made for staff with disabilities or long-term health conditions.
- Promote digital inclusion for staff to ensure equitable access to organizational resources.

5.4 Community Engagement

- Engage proactively with local community groups, charities, and partner organisations.
- Outreach and health promotion initiatives will consider diverse patient needs, including accessibility and inclusivity.
- Patient information materials will be provided in multiple languages and formats where required.
- Communities will be involved in co-designing interventions to improve health and digital literacy.

5.5 Leadership and Accountability

- Line managers and senior staff are responsible for embedding EDI in daily operations and team culture.
- Leadership team will monitor compliance and ensure that diversity and inclusion objectives are integrated into practice planning.
- Leadership team will ensure all staff undertake mandatory training at on-boarding and annually in relation to EDI and understanding discrimination
- Progress on health and digital literacy inclusion will be tracked and reported
- Leadership team will ensure that the population health and health inequality analysis for practice populations in neighbourhoods and sub-localities is development and shared with practice teams

5.6 Types of unlawful discrimination

- **Direct discrimination** - Direct discrimination is the legal term that applies if you treat someone less favourably than someone else has been treated (or would be treated) because of a 'protected characteristic' under the Equality Act 2010.

- **Indirect discrimination** - Indirect discrimination can happen when there are rules or arrangements that apply to a group of employees or job applicants, but in practice they are less fair to a certain 'protected characteristic'.

In very limited circumstances, employers can directly and indirectly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

- **Harassment** is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity which are covered by direct discrimination provisions in the Equality Act 2010) that has the purpose or effect of violating a person's dignity; or is reasonably considered by that person to create an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether this effect was intended by the person responsible for the conduct.
- **Victimisation** occurs where an employee has been treated badly such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint in bad faith.

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6. Responsibilities

All Staff:

- Promote and uphold EDI principles in all interactions.
- Attend mandatory EDI training sessions.
- Report incidents of discrimination, harassment, or exclusion.
- Support colleagues and patients in a respectful, inclusive manner.

Practice Management / Leadership Team:

- Ensure policies and procedures reflect current EDI best practice and legal requirements.
- Investigate breaches or complaints promptly and fairly.
- Support staff through mentoring, flexible working, and adjustments to promote inclusion.
- Monitor workforce and patient data to identify inequalities and take corrective action.
- Implement sustained interventions to improve health and digital literacy across patient populations.

Human Resources:

- Provides EDI employment law advice to Partners and Senior Management.
- Ensure all HR policies and procedures are compliant with current EDI employment law.
- Facilitating and monitoring completion of mandatory EDI staff training.
- Support recruitment, promotion, and retention strategies that promote equality, diversity and inclusion.
- Conducting Annual Sexual Harassment Risk Assessment
- Ensuring disciplinary and capability processes are fair and evaluated to ensure no detriment based on any protected characteristic.
- To facilitate our pledge to be a Disability Confident Committed Employer

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- Provide guidance and training on supporting patients and staff with low health and digital literacy.

EDI Working Group:

- Oversight and assurance on behalf of the organisation reporting to Partners
- Receives reporting on key metrics.
- Accountable for an EDI action log in relation to addressing issues identified through regular reporting.
- Responsible for producing and delivering an EDI improvement plan.
- Facilitating and supporting staff equality networks.

7. Reporting and Complaints

- Staff and patients can raise concerns about discrimination, harassment, or exclusion via management, grievance procedures, or the formal complaints process.
- All reports will be handled confidentially and sensitively, in line with NHS grievance and disciplinary procedures.
- Investigations will be impartial and proportionate, and outcomes communicated promptly.

8. Monitoring and Review

- Regular audits of workforce diversity, patient access, and complaints will be conducted to identify inequalities.
- Staff surveys and patient feedback will inform improvements.
- The policy will be reviewed annually, or sooner if there are significant legislative changes or organisational needs.
- EDI objectives, including health and digital literacy initiatives, will be incorporated into the practice's operational plans and appraisal processes.

9. Related Policies

- Safeguarding Policy
- EDI and Recruitment and Selection Policy
- Complaints Procedures
- Health and Safety Policy
- Mental Health and Wellbeing Policy
- Disciplinary and Grievance Policies
- Professionalism, Conduct and Behaviour Policy
- Prevention of Sexual Harassment at Work Policy
- Unacceptable Patient Behaviour SOP
- Family Friendly Policies including Maternity, Paternity, Adoption and Other Parental Leave Policy and Neo-natal Leave Policy.
- Menopause Policy
- Disability Discrimination Act SOP