

## Report of Performance and Compliance Officer

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### Subject: Equity, Diversity and Inclusion Policy

#### Purpose of Report

To ask Members to approve Equity, Diversity and Inclusion Policy (previously our Equal Opportunity Policy).

#### Background

We have reviewed our Equal Opportunity Policy that was last presented to NPA in 2019, and the policy last updated in 2020. The policy has been renamed to Equity, Diversity and Inclusion Policy. This policy

- Outlines our commitment to equity, diversity and inclusion and how we put this commitment into practice
- Explains the behaviours we expect of our people in support of this commitment and their responsibilities
- Sets out our commitment and how we will comply with the General and Welsh Specific Equality Duties and the Socio-Economic Duty
- Sets out how a concern or complaint can be reported if the Authority fails in its equality related duties or someone experiences discrimination

The policy has been updated to take account of Socio-Economic Duty, Welsh Government's Anti-Racism Wales Action Plan, procurement links to socially responsible procurement duty and wider best practice.

The policy has been reviewed by Strategic Advisor – Inclusion, Diversity and Governance lead. Members, Staff and Management Team have been provided with opportunity to provide feedback on the draft policy.

#### Financial considerations

Non-compliance with this policy could open the Authority up to legal challenges with financial implications.

Funders expect Authority to have in place a policy of this nature and it is often requested when making grant bids.

Provision of reasonable adjustments can impact on budgets. It is the responsibility of the Authority to meet the cost of reasonable adjustments. For employees the Access to Work Schem can help with costs.

### **Risk considerations/ Compliance**

The policy assists the Authority to comply with the Equality Act 2010 and Welsh Specific Equality Duties as a provider of goods and services, employee and as a Public Body.

There is the potential for financial, legal and reputational impact arising from failure to comply with equality legislation alongside impact on any individual experiencing discrimination, harassment or victimisation.

Tools such as equality impact assessments as part of integrated assessments, provision of training and active leadership in this area can assist the Authority with compliance with its equality obligations.

### **Equality Duty**

The policy plays a central role in ensuring the Authority complies with the Equality Act 2010 and Welsh Specific Duties. It outlines our commitment to equity, diversity and inclusion and how we put this commitment into practice

### **Section 6 Duty**

Equality section on integrated assessments can help the Authority ensure that its wider nature recovery and decarbonisation activities take account of impact on protected groups. This policy also supports the Authority in achieving one of its outcomes under its Conservation Well-being Objective of a wide range of people are supported to participate in taking action for nature.

### **Welsh Language**

This policy will be translated into Welsh. When considering this policy it is important to consider how the Welsh Language can interact with protected characteristics e.g. considering when making a reasonable adjustment whether a service user may require Easy Read information in Welsh.

### **Recommendation: Members are asked to approve the Equity, Diversity and Inclusion Policy.**

(For further information, please contact Mair Thomas, Performance and Compliance Officer)

Consulted/engaged with: Management Team, Strategic Advisor – Inclusion, Diversity and Governance Lead, Staff and Members.

# Pembrokeshire Coast National Park Authority

## POL\_E1 Equity, Diversity and Inclusion Policy

Version	Active Date	Document Owner	Internal/ External
3	Draft	Head of People Services	Internal/ External

Please note: Policy Control Sheet is at the end of the document. Policy document is uncontrolled once printed. Please refer to the Authority's Intranet site for up-to-date policy.

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### Does this Policy relate to me:

- All employees, job applicants, apprentices, interns, Members, volunteers, contractors and consultants of the Authority
- Authority service users and the general public

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### Quick Reference - Key Policy Messages:

- Outlines our commitment to equity, diversity and inclusion and how we put this commitment into practice
- Explains the behaviours we expect of our people in support of this commitment and their responsibilities
- Sets out our commitment and how we will comply with the General and Welsh Specific Equality Duties and the Socio Economic Duty
- Sets out how a concern or complaint can be reported if the Authority fails in its equality related duties or someone experiences discrimination

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## 1. Policy Statement

- 1.1 Pembrokeshire Coast National Park Authority (the Authority) is committed to creating a culture of inclusion which underpins everything that we do. Ensuring all stakeholders including service users, customers, volunteers, Members and employees of the Authority are treated with respect, equity, fairness and dignity. The Authority, through its activities, aims to proactively contribute to a fairer society through advancing equality of opportunity and good relations in our day-to-day activities. It aims to encourage a diverse range of people to participate in the work and opportunities provided by the Authority.
- 1.2 We believe that a culture of equity, diversity and inclusion not only benefits our organisation but supports wellbeing. It enables our people to work better because they can be themselves and feel that they belong. We are committed to promoting an environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation.
- 1.3 We are committed to ensuring that anyone who is working with us, applying to work with us, volunteering with us, receiving our services, or applying for services is not discriminated against based on their protected characteristics as defined by the Equality Act 2010:
- Age
  - Disability
  - Gender reassignment
  - Marital or civil partner status (employment only)
  - Pregnancy or maternity
  - Race, colour, nationality, ethnic or national origin
  - Religion or belief
  - Sex
  - Sexual orientation
- 1.5 The Authority will comply with the General Equality Duty, Welsh Specific Equality Duties, and Socio Economic Duty. It is also committed to adopting an Anti-Racism approach as set out in the [Anti-Racist Wales Action Plan](#): “Anti-racism is about changing the systems, policies and processes which for so long have embedded a negative view of ethnic minority people.”

## 2. Aim of Policy

- 2.1 The aim of this policy is to set out the Authority’s commitment to promoting equity, diversity, and inclusion in employment and services it provides. It also sets out how the Authority will meet the General and Specific Equality duties.
- 2.2 The policy accompanies our Bullying and Harassment policy, and any other equality, diversity and inclusion policies, objectives and strategies adopted by the organisation.

- 2.3 Fostering an inclusive culture helps each of us to benefit from a wider range of different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all and helps promote positive experiences for our service users.

### 3. Scope of Policy

- 3.1 This policy applies to anyone carrying out work for or representing the Authority. This includes employees, workers, contractors, volunteers, interns, apprentices and Members. The policy relates to job applicants and is relevant to all stages of the employment relationship. It also covers anyone receiving services from the Authority.

### 4. Definitions

- 4.1 The Equality Act 2010 tells us who is protected from discrimination. These are known as protected characteristics:
- **Age:** This refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 – 30 year olds).
  - **Disability:** A person is defined in the legislation as having a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. This can include people with physical and sensory disabilities, learning disabilities, neurodiversity including ADHD, autism, dyslexia and dyspraxia, mental ill health and long term health conditions for example heart conditions and HIV.
  - **Gender Reassignment:** The process of transitioning from one gender to another (from male to female or female to male).
  - **Marriage and Civil Partnerships:** Marriage is defined as a formal union between a man and a woman or two people of the same sex. Same-sex and opposite-sex couples can have their relationships legally recognized as 'civil partnerships'. Civil partners must be treated the same as married couples on most legal matters. Relates only to employment context.
  - **Pregnancy and Maternity:** Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
  - **Race:** It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

- **Religion and Belief:** Religion or belief can mean any religion, for example an organised religion like Buddhism, Christianity, Islam or Judaism, or a smaller religion like Paganism or Rastafarianism, as long as it has a clear structure and belief system. The Equality Act also covers non-belief or a lack of religion or belief. Philosophical belief is also included, the Equality Act says that a philosophical belief must be genuinely held and more than an opinion. It must be cogent, serious and apply to an important aspect of human life or behaviour. The Equality Act also says that a belief must also be worthy of respect in a democratic society and not affect other people's fundamental rights.
  - **Sex:** A man or a woman.
  - **Sexual Orientation:** Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.
- 4.2 **Equality:** The state of being equal, especially in status, rights, or opportunities.
- 4.3 **Equity:** Recognising that we are all different and do not start from the same place. Therefore, understanding the importance of addressing inequalities and creating opportunities for everyone to flourish across society.
- 4.4 **Diversity:** Celebrating and valuing how different we all are.
- 4.5 **Inclusion:** Actively creating an environment where everyone is treated with dignity and respect so that they feel welcomed and valued.

#### 4. Legislation

- 4.1 Equality Act 2010
- 4.2 The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- 4.3 Human Rights Act 1998
- 4.4 Racial and Religious Hatred Act 1996
- 4.5 The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 / The Public Sector Bodies (Websites and Mobile Applications) Accessibility (Amendment) (EU Exit) Regulations 2022
- 4.6 Well-being of Future Generations (Wales) Act 2015 – National Well-being Goal: A more equal Wales.
- 4.7 Protection from Harassment Act 1997

## 5. Our Duty as a Welsh Public Body

- 5.1 The Authority as a National Park Authority is a listed body under the Equality Act 2010. This means we are required under the General Equality Duty to consider how we can positively contribute to a fairer society through advancing equality and good relations in our day-to-day activities.
- 5.2 This means in exercising our functions, we are required to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
  - Advance equality of opportunity between people who share a relevant protected characteristic and those who do not
  - Foster good relations between people who share a protected characteristic and those who do not.
- 5.3 Having due regard involves:
- Removing or minimising disadvantages experienced by people due to their protected characteristics
  - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
  - Encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low
- 5.4 The Authority is also required to carry out the following activities to help us meet the General Duty under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011:
- **Strategic Equality Plan and Setting Equality Objectives:** We have a Strategic Equality Plan which sets out our equality objectives and the actions we are going to take to achieve them. Where possible we mainstream our actions into our Corporate and Resources Plan and associated Delivery Plans.
  - **Engagement:** We will engage people from protected groups when developing and setting our Equality Objectives and Plan. Where possible we will develop mechanisms to assist people from protected groups to influence the development of strategic plans and documents and inform our equality impact assessments. We will listen to feedback from all stakeholders including service users, volunteers, employees, Members and others to improve the way we deliver services for everyone including people across the protected characteristics. When we develop projects we will seek to engage project beneficiaries in their design. Listening to the views of young people, the next generation, is important to the Authority and we ensure that feedback from our Youth Committee influences our work, service delivery and priorities.



- **Assessing Impact:** We will carry out equality impact assessments on strategic policies, plans and key decisions that affect service users, employees, volunteers, Members and communities. These will normally form part of an integrated assessment.
- **Equality Information and Employment Information:** We collect and analyse equality monitoring information on staff and job applicants. Where feasible we will collect and analyse equality information from service users, volunteers and participants in projects that we deliver. We will use wider equality statistics, research and information to inform our equality impact assessments and development of plans, strategies and projects.
- **Pay Differences:** When drawing up our equality objectives we will have due regard to the need to have objectives that address the causes of any difference in pay between employees who are from any protected group and those who are not, if it appears reasonably likely that the reason for the difference is related to the fact that those employees share a protected characteristic. We will make appropriate arrangements to identify and collect information about differences in pay, and the causes of any such differences, between employees who have a protected characteristic and those who do not. If a Gender Pay Objective and difference is identified we will publish an action plan setting out the steps we intend to take to fulfil our gender pay objective and how long we expect it to take.
- **Training and Awareness:** We will promote knowledge and understanding of the general duty and specific duties amongst our employees and Members. We will use any performance assessment procedures to identify and address training needs in relation to the duties. All staff are required to complete equality and diversity training and it forms part of our induction process.
- **Procurement:** When procuring works, goods or services from other organisations on the basis of a relevant agreement we will have due regard to whether it would be appropriate for the award criteria for that contract to include considerations to help meet the general duty. We will also have due regard to whether it would be appropriate to stipulate conditions relating to the performance of the contract to help meet the three aims of the general duty. We will integrate equality considerations into our wider approach to socially responsible procurement.
- **Annual Reporting and Publishing Performance:** We will produce an annual equality report by 31 March each year.

5.5 The Socio-Economic Duty under the Equality Act 2010 which has been enacted in Wales places a legal responsibility on the Authority when it is

taking strategic decisions to have due regard to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage. Our integrated assessment process takes account of potential impacts for people experiencing socio-economic disadvantage.

## 6. Our Duty to Prevent and Respond to Discrimination

6.1 Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- Steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals
- Recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients
- Using different standards for different groups of employees to judge performance
- Providing better service to service users who share the same background, interests, or characteristics as themselves. This can lead to unequal service delivery, as customers who are perceived as different might not receive the same level of service.

6.2 The Authority has a duty to prevent and respond to all forms of discrimination and harassment under the Equality Act 2010 as an employer and as a service provider.

### Different types of discrimination under the Equality Act 2010

- **Direct discrimination:** Direct Discrimination happens when a person is treated less favourably/worse, because of a protected characteristic.

For example: Refusing to provide planning advice to someone because of their sexual orientation would be considered direct discrimination.

- **Indirect discrimination:** Indirect discrimination happens when a service provider or employer puts in place a rule or policy or way of doing things that has a negative impact on someone with a protected characteristic when compared with someone without one (when this cannot be objectively justified).

For example: A job advert states that all applicants must have a driving licence where this is not a clear requirement of the role. This may put

some disabled people at a disadvantage as they may not have a licence because, for example, they have epilepsy. If the advert is for an office or home based job this requirement would be difficult to justify.

- **Harassment:** Occurs when a person engages in unwanted conduct which has the purpose or effect of violating someone's dignity or which is hostile, degrading, humiliating or offensive to someone with a protected characteristic. This can be in a way that is sexual in nature.

For example: A customer in the reception area overhears a staff member making racist comments. This is harassment as it creates an intimidating, degrading and humiliating environment and violates the customer's dignity. The comment does not have to be about or directed at the person.

- **Victimisation:** Treating someone unfavourably because they have taken (or might be taking) action under the Equality Act 2010 or are supporting somebody who is doing so.

For example: A manager refusing to consider someone for promotion because they gave evidence on behalf of a colleague who made a complaint of unlawful sex discrimination.

- 6.4 **Bullying:** There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

You should refer to our Bullying and Harassment policy for further information on our procedure for reporting bullying.

- 6.5 The Act also protects people from:

- **Discrimination by perception:** People are protected from discrimination by someone who wrongly perceives them to have one of the protected characteristics and treats them less favourably/worse because of this.

For example: A manager decides not to promote a member of staff because they believe they are Jewish. This is still discrimination if the staff member is not of the Jewish faith.

- **Discrimination by association:** People are protected from discrimination because they are associated with someone who has a protected characteristic. This includes the parent of a disabled child or adult or someone else who is caring for a disabled person.

For example: A job candidate who has been told they are getting a job is suddenly deselected after revealing they have a severely disabled child with complicated care arrangements. The withdrawal of the job offer could amount to discrimination because of their association with a disabled person.

- **Discrimination arising from disability:** Treating a disabled person unfavourably because of something connected with their disability when this cannot be justified. This only applies if you know or could reasonably have been expected to know that the person is a disabled person. This is called discrimination arising from disability.

For example: An event attendee experiences psychosis and hears voices, which they manage by talking to them. When the attendee is talking to their voices, Staff facilitating the event ask the attendee to leave. The event attendee has been treated unfavourably because of behaviour related to their disability.

## 7. Our Duty to Provide Reasonable Adjustments

7.1 Under the Equality Act 2010, the Authority as a service provider and employer has a duty to make reasonable adjustments where needed for disabled people where they are at a substantial disadvantage compared to other people who do not have a disability.

7.2 Reasonable adjustments include:

- Making changes to the way things are done when a policy, provision, criterion or practice puts disabled people at a substantial disadvantage compared to those who are not disabled
- Making changes to the built environment, or physical features around you that put a disabled person at substantial disadvantage or adopt a reasonable alternative method of providing the service or exercising the function
- Providing auxiliary aids and services to overcome the substantial disadvantage

- 7.3 This duty is anticipatory, so where possible reasonable adjustments should be considered in advance. We cannot ask service users or employees to pay for the cost of reasonable adjustments.
- 7.4 If we do not make reasonable adjustments when it would have been reasonable to do so, this will be unlawful discrimination.
- 7.5 The Authority is required to comply with the Public Sector Bodies Accessibility Regulations 2018/2022, which require public sector websites and mobile apps to be more accessible by making them ‘perceivable, operable, understandable and robust’. As part of our compliance we:
- Check our website and mobile app for accessibility problems using automated and manual testing methods
  - Make plans to fix any accessibility problems we find, within reason
  - Publish an [accessibility statement](#) on our website and mobile apps, stating non-accessible content and alternatives as well as contacts
  - Provide a feedback mechanism so users can flag accessibility problems or request information published in a non-accessible content

## 8. Positive Action

- 8.1 As part of complying with the General Equality Duty, the Authority can consider whether taking positive action is open to them and, if so, whether it would be appropriate to take that action.
- 8.2 Positive action will be lawful for a relevant body where it reasonably thinks that people who share a protected characteristic:
- Experience a disadvantage connected to that characteristic; or
  - Have needs that are different from the needs of persons who do not share that characteristic; or
  - Have disproportionately low participation in an activity compared to those who do not share that protected characteristic.
- 8.3 Action may be taken when any one or all of these conditions exist. Sometimes the conditions will overlap – for example, people sharing a protected characteristic may be at a disadvantage which may also give rise to a different need or may be reflected in their low level of participation in particular activities.
- 8.4 Where the conditions above apply, the relevant body may take any action which is proportionate to meet the aims stated in the Act. Those aims are:
- Enabling or encouraging persons who share the protected characteristic to overcome or minimise that disadvantage
  - Meeting those needs

- Enabling or encouraging persons who share the protected characteristic to participate in that activity.
- 8.5 Positive action is not the same as positive discrimination, which is unlawful.
- 8.6 As with other types of discrimination covered by the Act, it is important to note that it is lawful to treat a disabled person more favourably than a non disabled person.
- 8.7 **Example of Positive Action:** A National Park Authority has no Authority Members under the age of 30. It puts in place a mentoring scheme to encourage greater numbers of young people to take an interest in governance within National Parks. Its longer term aim is to increase the number of younger councillors or Welsh Government appointees. Places are awarded via an open competition and the winners get to shadow nominated councillors or Welsh Government appointees.

## 9. Roles and Responsibilities

- 9.1 We expect every one of our people to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.
- 9.2 The Chief Executive, Senior Leadership Team and Management Team are responsible for leading on and ensuring the implementation of this policy and that equity, diversity and inclusion is mainstreamed throughout the Authority.
- 9.3 All managers are responsible for ensuring the implementation of the policy in the day to day delivery of services and management of staff. Managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage are aware and adhere to the policy.
- 9.4 All staff, Members and volunteers have a duty to uphold this policy by:
- Acting and always behaving in a way that supports the Public Sector Equality Duties
  - Treating all colleagues, Members, Volunteers, customers, service users and members of the public with dignity, respect and courtesy,
  - Challenging inappropriate comments or ways of working, discrimination or bringing suspected breaches to their line manager's attention or through other reporting mechanisms
  - Carrying out when required equality impact assessments on strategic policies, plans and key decisions that affect service users, employees, volunteers and communities
- 9.5 If any of our people is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary procedure.

- 9.6 Individuals should be aware that they can be personally liable for discrimination and harassment.

## 10. Reporting a concern or complaint

- 10.1 There are a number of different routes for reporting a concern or complaint.
- 10.2 If an employee or volunteer feels that this policy is not being followed, they should raise this with their line manager. If matters cannot be resolved by the line manager, or where the complaint relates to the line manager, you should follow the organisations Dignity at Work or Whistle-blowing policy.
- 10.2 If an employee or volunteer experiences harassment or discriminatory behaviour by a third party, for example a client or a supplier, they should report this to their line manager or the People Services team without delay. This is so that they can advise on the best course of action and where needed a corporate response can be put in place.
- 10.3 If an employee or volunteer has any questions about this policy, they should discuss them with their line manager, or they can be raised with the Authority's People Services or Performance and Compliance Officer.
- 10.4 Disciplinary matters that arise from this policy will be dealt with using the Authority's Disciplinary Procedure.
- 10.5 If a member of the public, Authority Member, Authority volunteer, contractor or partner organisation feels that this policy is not being followed, they can make a Complaint, this process is set out in our Customer Service Standards Document.
- 10.5 Complaints relating to Members will be dealt with by the Public Services Ombudsman where this relates to breaches of the Code of Conduct, and may be referred on to the Authority's Standards Committee. Advice is available from the Authority's Monitoring Officer.

## 11. Support

- 11.1 [Equality Advisory Support Service](#): 0808 800 0082
- 11.2 [ACAS Helpline](#): 0300 123 1100
- 11.3 If you have experienced a hate crime, [Wales Hate Support Centre](#) run by Victim Support provide independent and confidential support: 03000 3031 982

## 12. Monitoring and Assurance

- 12.1 Implementation of this policy will be monitored by the Management Team. Staff, Volunteers and Members are encouraged to bring to the attention of members of Management Team any concerns or issues relating to non

compliance with this policy or opportunities to promote Public Sector Equality Duty in the work of the Authority.

- 12.2 Policy to be reviewed every 3 years or earlier to respond to any legislative or operational changes.

### **13. Related Policies and Operational Procedures**

- 13.1 Equality Objectives and Plan
- 13.2 Dignity at Work Policy and Bullying and Harassment Policy
- 13.3 Disciplinary Procedure
- 13.4 Whistleblowing Policy
- 13.5 Domestic abuse in the workplace Policy
- 13.6 Customer Service Standards
- 13.7 Employee Code of Conduct and Members Code of Conduct
- 13.8 Recruitment Policy
- 13.9 Socially Responsible Procurement Policy



## Policy Control Sheet

### Change Level

Change Level	Tick
Minor editorial/ accuracy changes	
Change requires Management Team Approval Only	
New Policy or Change requires NPA Approval / HR Committee Approval	✓ (Accountability)

### Consultation

Group	Date
Strategic Advisor	April/May 2024
Management Team	6/8/24
Staff and Members	30/8/24 – 24/9/24

### Assessments

Assessment – If Applicable	Date
Integrated Assessment – Full	N/A
Integrated Assessment – Policy/ Procedure Review	N/A
Data Protection Impact Assessment	N/A

### Approval

Approved by	Name	Date	Signature
National Park Authority			

### Version History

Version	Active Date	Summary of Changes
1	4 /9/19	Approved Policy
2	2/1/20	Civil Partnership definition changed to reflect change in law (Section 3: Definitions)
3		Moved to new template. Title changed from Equal Opportunity Policy to Equity, Diversity and Inclusion. Policy updated to take account of socio economic duty and wider best practice.

### Review

Version	Active Date	Document Owner	Review Date Trigger
3		Head of People Services	Every 3 years or earlier to respond to any legislative or operational changes.

### Publication

Policies must be co-ordinated through the Performance and Compliance Team, for compliance, auditing, and control purposes. Please send all new or reviewed policies

once approved to mairt@pembrokeshirecoast.org.uk for formal publication of policy to staff and where required on the Authority's website.

Publication	Date
Published on Sharepoint Corporate Policy Hub	
External Policy – Published on Website: HTML	