

# PADDINGTON DEVELOPMENT TRUST

Registered Charity No. 1080883 | Company No. 03652559

## POLICY DOCUMENT

# Fair Work and Workforce Inclusion Policy

The Stowe Centre, 258 Harrow Road, London, W2 5ES

[www.pdt.org.uk](http://www.pdt.org.uk)

<b>Policy Title</b>	Fair Work and Workforce Inclusion Policy
<b>Organisation</b>	Paddington Development Trust
<b>Registered Charity</b>	No. 1080883
<b>Company Number</b>	No. 03652559
<b>Address</b>	The Stowe Centre, 258 Harrow Road, London, W2 5ES
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<b>Approved By</b>	Board of Trustees
<b>Policy Owner</b>	Chief Executive

### Statement of Intent

*Paddington Development Trust is committed to being a fair, inclusive and supportive employer. This policy sets out our approach to fair work, equal opportunities and workforce inclusion, ensuring that everyone who works with us is treated with dignity and respect, and has a genuine opportunity to contribute and thrive.*

## 1. Introduction

PDT is a community-anchored charity working to improve the lives of people in Paddington and more widely in Westminster. We believe that our ability to deliver for our community depends on having a team that is treated fairly, feels genuinely included, and reflects the diversity of the people we serve.

This policy sets out PDT's commitment to fair work and workforce inclusion across every aspect of our employment practice – from how we recruit and pay people, to how we support their development and handle concerns. It applies alongside our other employment policies and procedures and should be read as part of a wider commitment to being a values-led employer.

PDT recognises that fair work is not simply a legal requirement; it is central to who we are and how we operate. We are committed to creating a working environment in which every individual, whatever their background or identity can participate fully and contribute meaningfully.

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## 2. Scope and Application

This policy applies to:

- All employees of PDT, whether employed on a permanent, fixed-term, part-time
- Volunteers working with PDT
- Consultants, contractors and agency workers engaged by PDT
- Trustees and members of PDT's governance structures
- Job applicants and candidates for positions with PDT

References to 'staff' throughout this document include all of the above groups unless otherwise stated. Line managers, the Chief Executive and the Board of Trustees share responsibility for ensuring this policy is applied consistently and effectively.

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## 3. Legal Framework

This policy is underpinned by a comprehensive legal framework. PDT will meet, and where possible exceed, its obligations under the following legislation and guidance:

- Equality Act 2010 – including its public sector equality duty
- Employment Rights Act 1996
- National Minimum Wage Act 1998 and associated National Living Wage regulations
- Working Time Regulations 1998
- Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- Disability Discrimination Act 1995 (as consolidated by the Equality Act 2010)

- Human Rights Act 1998
- Public Interest Disclosure Act 1998 (whistleblowing)
- Agency Workers Regulations 2010
- General Data Protection Regulation (UK GDPR) and Data Protection Act 2018
- Health and Safety at Work etc. Act 1974
- Modern Slavery Act 2015

PDT will monitor developments in employment law and update this policy accordingly. We also draw on guidance issued by the Equality and Human Rights Commission (EHRC), ACAS, the Charity Commission and the London Living Wage Foundation.

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## 4. Our Principles of Fair Work

PDT's approach to fair work is built around five core principles:

### 4.1 Security

We will offer appropriate security of employment and provide clarity about the terms and conditions of work. We will not use zero-hours contracts as a default arrangement where regular and predictable work is available. Where flexible or non-standard contracts are used, we will be transparent about the reasons and review arrangements regularly.

### 4.2 Respect and Dignity

Every person who works with PDT has the right to be treated with dignity and respect. We will not tolerate bullying, harassment, discrimination or victimisation of any kind. We will take prompt and proportionate action whenever these behaviours are reported or identified.

### 4.3 Opportunity

We will work actively to remove barriers to progression and development. All staff will have access to training, support and fair processes for career development, and we will make reasonable adjustments to enable people with disabilities or other access needs to participate fully.

### 4.4 Fulfilment

We believe that people do their best work when their roles are meaningful, their contributions are recognised and they have some autonomy in how they work. We will seek to create roles that are engaging and purposeful and will listen to staff about how their work could be improved.

### 4.5 Voice

PDT is committed to creating an environment where staff feel safe to speak up, raise concerns and contribute ideas. We will maintain open channels of communication between staff and management, offer regular opportunities for feedback, and ensure that staff are informed about decisions that affect them.

## 5. Equal Opportunities and Non-Discrimination

### 5.1 Our Commitment

PDT is an equal opportunities employer. We are committed to ensuring that no one who applies for a job with us, or who works for us, receives less favourable treatment on grounds that are unlawful or contrary to our values.

### 5.2 Protected Characteristics

The Equality Act 2010 protects people from discrimination on the basis of nine protected characteristics. PDT is committed to ensuring fair treatment in relation to all of these:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership (in employment)
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion or belief
- Gender
- Sexual orientation

PDT also recognises that people can experience discrimination and disadvantage related to other characteristics not listed above, including socioeconomic background, caring responsibilities, or migration status, and we are committed to treating all staff fairly regardless of these factors.

### 5.3 Forms of Discrimination

PDT will not engage in, or permit, any of the following forms of unlawful discrimination:

- Direct discrimination – treating someone less favourably because of a protected characteristic
- Indirect discrimination – applying a provision, criterion or practice that puts people with a particular characteristic at a disadvantage, without justification
- Harassment – unwanted conduct related to a protected characteristic that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment
- Victimisation – treating someone less favourably because they have made, or supported, a complaint about discrimination
- Discrimination arising from disability – treating someone unfavourably because of something connected with their disability
- Failure to make reasonable adjustments for a person with a disability

### 5.4 Positive Action

Where evidence shows that people with protected characteristics are underrepresented in our workforce or are at a disadvantage, PDT may take proportionate positive action measures to address this, for example, targeted outreach, supported applications or dedicated development opportunities. Positive action is distinct from positive discrimination, which remains unlawful.

## 6. Recruitment and Selection

### 6.1 Fair and Open Recruitment

PDT is committed to recruiting the best person for every role, through a fair and transparent process that is free from bias. All recruitment will be based on the skills, experience and qualities genuinely required to carry out the role, as set out in the job description and person specification.

### 6.2 Advertising

Vacancies will ordinarily be advertised widely to attract a diverse pool of candidates. We will use plain and accessible language in all our job adverts. Where we identify that certain groups are underrepresented in our workforce, we may take proportionate steps to reach those groups through targeted advertising or outreach.

### 6.3 Application Process

Application processes will be designed to be accessible. We will:

- Make applications available in alternative formats on request
- Ensure shortlisting is based solely on the requirements of the person specification
- Apply blind shortlisting where practicable, removing names and other identifying details before review
- Ensure that at least two people are involved in shortlisting decisions

### 6.4 Interview and Assessment

Interviews and assessments will be:

- Based on structured questions derived from the person specification
- Conducted by panels that are, wherever possible, diverse in their composition
- Documented consistently, with decision records retained
- Adjusted to accommodate the needs of disabled candidates or those with other access requirements

We will not ask candidates questions about protected characteristics except where they are a genuine occupational requirement of the role. We will not ask about health conditions or disability at the application or interview stage; relevant queries may be raised only after a conditional offer has been made, solely to consider whether reasonable adjustments are needed.

### 6.5 Disclosure and Barring

Where posts involve working with children, young people or vulnerable adults, PDT will carry out appropriate Disclosure and Barring Service (DBS) checks as required. Having a criminal record will not automatically disqualify a candidate; PDT will consider the nature, circumstances and relevance of any offence in the context of the role.

## 6.6 Right to Work

PDT is required by law to check that all employees have the right to work in the United Kingdom. These checks will be carried out consistently for all candidates and in a manner that does not discriminate on grounds of nationality or ethnicity.

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## 7. Pay and Reward

### 7.1 Fair Pay

PDT is committed to paying staff fairly and transparently. We will:

- Pay all staff at or above the London Living Wage, as a minimum
- Seek to maintain salary levels that are competitive within the community and voluntary sector
- Review pay scales regularly to ensure they remain fair and consistent

### 7.2 Pay Transparency

PDT will be transparent about its pay structure. Salary bands or ranges will be published in job adverts. We will not ask candidates about their current salary as a basis for setting pay offers.

### 7.3 Equal Pay

PDT is committed to equal pay for equal work. All staff doing work of equal value will be paid equitably, regardless of sex or any other protected characteristic. We will carry out pay audits periodically to identify and address any unjustified pay disparities.

### 7.4 Benefits

PDT will ensure that employment benefits are applied consistently and equitably across the workforce. Staff will be informed clearly of all benefits to which they are entitled. We will seek to offer benefits that are meaningful and accessible to staff with different needs and circumstances.

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## 8. Working Hours, Flexible Working and Work-Life Balance

### 8.1 Working Hours

PDT will comply with the Working Time Regulations 1998 in relation to maximum weekly working hours, rest breaks and annual leave entitlements. We will not require staff to work excessive hours, and we actively discourage a culture of overworking. Staff will be encouraged to use their full annual leave entitlement each year.

### 8.2 Flexible Working

PDT recognises that staff have lives outside work and that different working arrangements suit different people and circumstances. We support flexible working in all its forms, including:

- Part-time working
- Compressed hours

- Hybrid and remote working, where compatible with the role
- Flexible start and finish times
- Job sharing
- Term-time working

All employees with at least 26 weeks' continuous service have a statutory right to request flexible working. PDT will handle all requests fairly and with genuine consideration and will decline requests only where there is a clear business reason for doing so. We will consider requests from staff with fewer than 26 weeks' service on the same basis wherever possible.

### **8.3 Parental and Family Leave**

PDT will meet its legal obligations in relation to maternity, paternity, adoption, shared parental and parental bereavement leave, and will seek to go beyond statutory minimums where resources allow. We will support staff before, during and on return from parental leave, and will treat requests for flexible working arrangements on return from parental leave with particular care and openness.

### **8.4 Carer's Leave**

PDT recognises that many staff have caring responsibilities for relatives with disabilities, long-term conditions or other needs. We will comply with the Carer's Leave Act 2023, and we will seek to accommodate caring responsibilities through flexible and supportive working arrangements. Staff with caring responsibilities will not be penalised for making use of their entitlements.

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## **9. Workforce Inclusion and Diversity**

### **9.1 Our Approach to Inclusion**

PDT understands that equality and diversity alone are not enough. Inclusion – ensuring that all staff genuinely feel that they belong, are valued and can participate fully – requires active and sustained effort. We will take a proactive approach to inclusion, regularly reviewing our practices and listening to staff about their experiences.

### **9.2 Diversity in Our Workforce**

PDT serves a highly diverse community, and we believe our workforce should reflect that diversity. We will actively seek to build a workforce that includes people from a wide range of backgrounds, and we will monitor our workforce data to understand where progress is still needed. Our commitment to diversity covers all protected characteristics, as well as socioeconomic background, migration and refugee status, and other dimensions of identity and experience.

### **9.3 Inclusive Culture**

We will work to build an inclusive culture at PDT by:

- Providing inclusion training for all staff and targeted training for managers
- Creating regular opportunities for staff to give feedback on their experience of working at PDT



- Acknowledging and celebrating the diversity of our team and our community
- Ensuring that communications and materials are accessible and inclusive
- Supporting staff networks or forums if there is demand for these
- Taking prompt action when incidents inconsistent with our values are reported

## 9.4 Intersectionality

PDT recognises that people hold multiple identities and that the experience of discrimination or disadvantage can be compounded where these intersect, for example, for a Black disabled woman or a young person from a deprived background. We will take an intersectional approach to inclusion, considering how different aspects of identity may interact to shape people's experiences at work.

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## 10. Disability and Reasonable Adjustments

### 10.1 Our Commitment

PDT is committed to being a genuinely disability-inclusive employer. We recognise that disability takes many forms – including physical, sensory, neurological, cognitive and mental health conditions – and that many people with disabilities do not identify with that label or prefer not to disclose.

### 10.2 Reasonable Adjustments

PDT has a legal duty to make reasonable adjustments to remove disadvantages experienced by disabled staff and job applicants. We will:

- Offer adjustments proactively at each stage of the recruitment process
- Discuss and agree adjustments with disabled staff in a sensitive and confidential manner
- Review adjustments regularly to ensure they remain effective
- Not require disabled staff to justify repeated requests for adjustments
- Consult Occupational Health or other specialists where appropriate

Examples of adjustments may include changes to working hours or location, provision of specialist equipment, amendments to duties, or additional support from a colleague or manager. What is 'reasonable' will depend on the circumstances, including the cost and practicability of the adjustment and the size of PDT's resources.

### 10.3 Disability Confident

PDT will work towards recognition as a Disability Confident employer and will encourage disabled people to apply for roles with us. We will guarantee an interview to disabled applicants who meet the minimum criteria for a role, under our commitment to inclusive recruitment.

### 10.4 Mental Health

PDT is committed to supporting staff mental health and wellbeing. We will:

- Promote a culture in which it is safe to speak about mental health
- Train managers to recognise signs of mental ill-health and to respond sensitively



- Provide access to mental health resources and signpost staff to appropriate support
  - Take a supportive approach to managing absence related to mental health
  - Review workloads and working conditions to reduce unnecessary stress
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## 11. Bullying and Harassment

### 11.1 Our Commitment

PDT has a zero-tolerance approach to bullying and harassment in any form. Every person who works with us has the right to a working environment that is free from behaviour that is intimidating, hostile, degrading or offensive. This applies to behaviour by staff towards other staff, towards people we work with in the community, and towards staff by third parties.

### 11.2 What Constitutes Bullying and Harassment

Bullying is behaviour that is offensive, intimidating, malicious or insulting, or an abuse or misuse of power that undermines, humiliates, denigrates or injures the person to whom it is directed. Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples may include:

- Verbal abuse, offensive remarks or deliberate exclusion
- Unwanted physical contact
- Inappropriate jokes or comments, including those shared digitally
- Persistent unwarranted criticism or undermining of someone's work
- Spreading malicious rumours
- Sexual harassment, including unwanted advances or comments
- Discriminatory behaviour related to any protected characteristic

### 11.3 Reporting and Action

Staff who experience or witness bullying or harassment are encouraged to report this to their line manager, the Chief Executive, or a Trustee. PDT will investigate all reports promptly, fairly and confidentially. Staff who raise concerns will be protected from victimisation. Where allegations are substantiated, PDT will take proportionate disciplinary action, which may include dismissal.

PDT recognises that many people find it difficult to report bullying or harassment, and we will ensure that support is available throughout the process. Staff may bring a colleague or trade union representative to any meeting connected with a complaint.

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## 12. Training and Development

### 12.1 Access to Development

PDT believes that investing in the development of our staff is good for individuals, good for the organisation and good for the communities we serve. All staff will have

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access to appropriate training and development opportunities, regardless of their contract type, working pattern or background.

## 12.2 Induction

All new staff will receive a thorough induction that introduces them to PDT's culture, values and ways of working, as well as the specific requirements of their role. Inductions will be inclusive and accessible, and will include information about equality, inclusion and this policy.

## 12.3 Ongoing Development

PDT will:

- Provide all staff with at least an annual development conversation with their line manager
- Support staff to identify development goals and agree plans to pursue them
- Provide training relevant to staff roles and to their progression aspirations
- Ensure that mandatory training – including equality, safeguarding and data protection – is accessible to all staff
- Support staff to attend external events, training courses and networks where these are relevant and resources allow

## 12.4 Inclusive Development

We will pay specific attention to ensuring that development opportunities are equitably distributed. We will monitor take-up of development activities by different staff groups and act where disparities are identified. Part-time staff, those on flexible arrangements and those from underrepresented groups will have the same access to development as full-time staff in mainstream roles.

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# 13. Staff Wellbeing and Support

## 13.1 Commitment to Wellbeing

PDT is committed to the health, safety and wellbeing of all staff. We recognise that working in the community and charity sector can be rewarding but also demanding, and that staff may sometimes need practical or emotional support. We will seek to create conditions that support staff to be well and to do their best work.

## 13.2 Health and Safety

PDT will fulfil its duties under the Health and Safety at Work etc. Act 1974 and associated regulations. Risk assessments will be carried out regularly and staff will be informed of relevant risks and how they are managed. Staff are expected to take reasonable care of their own health and safety and to cooperate with PDT's health and safety arrangements.

## 13.3 Absence Management

PDT will manage absence in a fair, compassionate and consistent manner. Staff who are absent due to ill health will receive appropriate support to return to work. Return-to-work conversations will take place after periods of absence and will be supportive in nature. Where a pattern of absence is a concern, this will be discussed sensitively

with the member of staff, and adjustments will be considered before any formal action is taken.

### **13.4 External Support**

PDT will, where resources allow, make available or signpost staff to external support services, including:

- Employee Assistance Programme (EAP) services providing confidential counselling and advice
- Mental health first aid or peer support
- Occupational health advice
- Financial wellbeing guidance

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## **14. Grievance Procedure**

### **14.1 Raising Concerns**

PDT wants staff to feel able to raise concerns, problems or complaints about their work or working environment. We believe that issues are best resolved quickly and informally wherever possible. Staff are encouraged to raise concerns with their line manager in the first instance. Where this is not appropriate, for example, if the concern involves the line manager, staff may approach the Chief Executive or, in cases involving the Chief Executive, the Chair of Trustees.

### **14.2 Formal Grievance**

Where informal resolution is not possible or appropriate, staff may submit a formal written grievance. PDT will:

- Acknowledge receipt of the grievance promptly
- Investigate the matter thoroughly and impartially
- Hold a hearing to allow the staff member to explain their concern
- Communicate the outcome in writing
- Operate an appeal process for staff who are dissatisfied with the outcome

PDT's full Grievance Procedure is set out in a separate document available from the Chief Executive.

### **14.3 Protection from Victimisation**

Staff who raise a grievance in good faith will be protected from any form of retaliation or victimisation. Any retaliation will itself be treated as a serious disciplinary matter.

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## **15. Disciplinary Procedure**

### **15.1 Standards of Conduct**

PDT expects all staff to maintain high standards of conduct and professional behaviour. Our Code of Conduct sets out in more detail the behaviours expected of staff. Where these standards are not met, PDT will follow a fair and consistent disciplinary process.

## 15.2 Principles

PDT's disciplinary process is based on the ACAS Code of Practice on disciplinary and grievance procedures. Key principles include:

- Matters will be addressed promptly and consistently
- Staff will be given advance notice of any disciplinary meeting, including the nature of the allegation
- Investigations will be carried out before any disciplinary meeting
- Staff have the right to be accompanied by a colleague or trade union representative at formal meetings
- A range of sanctions is available, from informal advice to dismissal, depending on the seriousness of the matter
- Staff have the right of appeal against any formal disciplinary decision

PDT's full Disciplinary Procedure is set out in the PDT Employee Handbook available online and from Line Managers.

## 15.3 Gross Misconduct

Certain behaviours will be treated as potential gross misconduct, which may result in summary dismissal without notice. These include but are not limited to: serious acts of discrimination, bullying or harassment; misuse of PDT funds or assets; breach of confidentiality; and behaviour that brings PDT into disrepute.

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## 16. Whistleblowing

PDT is committed to the highest standards of transparency and accountability. Staff who have genuine concerns about wrongdoing – including illegal activity, financial irregularity, serious safety risks, or a failure to comply with legal obligations – are encouraged to raise these concerns.

PDT's Whistleblowing Policy sets out the process for raising concerns, the protections available to those who do so, and how concerns will be investigated. Staff who make a disclosure in good faith will be protected from detriment under the Public Interest Disclosure Act 1998. Raising a concern in good faith is never a disciplinary matter, even if the concern turns out not to be well founded.

Concerns may be raised with the Chief Executive, the Chair of Trustees, or externally to the service commissioning body, Charity Commission or other relevant regulator.

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## 17. Monitoring, Review and Accountability

### 17.1 Workforce Monitoring

PDT will collect and analyse anonymised workforce data to help us understand the composition of our workforce and identify areas where our commitment to inclusion needs to be strengthened. This will include data on:

- Age
- Disability status

- Ethnicity
- Gender
- Sexual orientation (where staff choose to disclose)
- Contract type and working pattern
- Pay levels by staff group

Data will be collected, stored and used in accordance with UK GDPR and PDT's Data Protection Policy. Participation in monitoring exercises is voluntary. Aggregated, anonymised data will be reported to the Board of Trustees annually.

## 17.2 Impact Assessment

PDT will carry out equality impact assessments on significant new policies, procedures or decisions that could affect staff or service users. The results of impact assessments will inform decision-making and will be documented.

## 17.3 Policy Review

This policy will be reviewed at least every two years, or sooner where there are significant changes in legislation, guidance or organisational circumstances. The Chief Executive is responsible for initiating the review and bringing any proposed changes to the Board of Trustees for approval. Staff will be consulted during the review process.

## 17.4 Reporting

The Chief Executive will report to the Board of Trustees at least annually on matters relating to fair work and workforce inclusion, including:

- Key workforce metrics and trends
- Outcomes from the grievance and disciplinary procedures
- Staff feedback and wellbeing data
- Training and development participation
- Progress against any specific inclusion commitments or action plans

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## 18. Responsibilities

### 18.1 Board of Trustees

The Board of Trustees is responsible for:

- Approving this policy and overseeing its implementation
- Holding the Chief Executive to account for fair work and inclusion outcomes
- Ensuring that governance processes themselves are inclusive and fair
- Acting as a final point of escalation for serious concerns

### 18.2 Chief Executive

The Chief Executive is responsible for:

- Leading on fair work and inclusion culture across the organisation
- Ensuring managers receive adequate training and guidance
- Overseeing recruitment, pay and employment practices

- Reporting to the Board on fair work and inclusion matters
- Updating and reviewing this policy

### 18.3 Line Managers

Line managers are responsible for:

- Implementing this policy fairly and consistently within their teams
- Creating inclusive team environments and challenging discriminatory behaviour
- Supporting staff development and wellbeing
- Handling concerns, grievances and performance matters appropriately
- Seeking advice from the Chief Executive when uncertain

### 18.4 All Staff

All staff are responsible for:

- Treating colleagues, community members and other stakeholders with dignity and respect
- Familiarising themselves with this policy and related policies
- Raising concerns about discriminatory, unfair or inappropriate behaviour
- Supporting an inclusive and fair working environment
- Participating in monitoring and feedback exercises

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## 19. Related Policies and Documents

This policy should be read alongside PDT's other key policies and procedures, including:

- Code of Conduct
- Grievance Procedure
- Disciplinary and Dismissal Procedure
- Safeguarding and Child Protection Policy
- E-Safety and Digital Safeguarding Policy
- Data Protection Policy
- Health and Safety Policy
- Whistleblowing Policy
- Flexible Working Policy
- Social Value and Community Impact Policy
- Anti-Bullying and Harassment Policy

In the majority of cases, copies of these are outlined in the PDT Employee Handbook and in some other policies, all which are available online and from Line Managers.

## 20. Questions and Contacts

If you have questions about this policy or about fair work and inclusion at PDT, please contact:

<b>Chief Executive</b>	Paddington Development Trust, The Stowe Centre, 258 Harrow Road, London, W2 5ES
<b>Chair of Trustees</b>	Contact via the Chief Executive in the first instance
<b>Charity Commission</b>	<a href="http://www.gov.uk/charity-commission">www.gov.uk/charity-commission</a>   0300 066 9197
<b>ACAS Helpline</b>	0300 123 1100   <a href="http://www.acas.org.uk">www.acas.org.uk</a>
<b>Equality Advisory Line</b>	0808 800 0082   <a href="http://www.equalityadvisoryservice.com">www.equalityadvisoryservice.com</a>

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