



Diversity, Equity and Inclusion:

Culture and Inclusion Policy - our approach to embedding a positive and inclusive culture

The EYF is committed to reviewing this policy annually.

Amendment History

Version	Date	Change	Main Author
Dec 2022	02.10.23	Contact Information table (p.11) updated to reflect: <ul style="list-style-type: none">• Replaced prior CFO information (Nil Neale) with newly in role CFO (Liz Crossley) information• Updated job details of Head of Programmes & Regions to Chief Programmes Officer• Added two new Leadership positions• Inclusion of links to EY Grievance Policy, EY Dignity at Work Policy and EY Global Code of Conduct	Anu Law

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1. Introduction

The EY Foundation (EYF) helps young people facing barriers to entering the workplace and supports social entrepreneurs scale up sustainably.

We aim to put young people at the heart of everything we do.

As a registered independent charity, our values, mission and compliance with legislation shapes all that we do and the decisions that we make.

Our values describe who we are and how we work together to achieve our aims to help young people.

- **Growth mindset:** Increase our impact on more young people through dedication, innovation and hard work
- **Empower our team:** Everyone is supported to succeed in their role through opportunities to learn, develop and take on new challenges
- **Courage:** Use new learning and diversity of thought to challenge the status quo; embracing lessons learned even if a project misses its targets
- **Collaboration:** Build relationships - internally and externally - to share ideas, embed an inclusive approach and achieve bigger outcomes

2. The Culture and Inclusion Policy

2.1 Who this policy applies to

This policy applies to all employees, including senior managers and the Board of Trustees, Youth Advisory Board (YAB), volunteers and seconded employees, mentors, agency employees, contract, seasonal, apprentices, interns, students, or anyone working on behalf of EYF in either a voluntary or paid capacity. This also includes third party suppliers.

2.2 The purpose of this policy

At EYF, our aim is to maximise the benefits of diversity in our culture and ensure that no one is discriminated against based on their protected characteristics.

This document outlines the Culture and Inclusion policy, the EYF's responsibilities to maintaining an inclusive culture and how seriously we take the delivery of those, and reporting procedures.

We are committed to building a diverse and inclusive organisation, free from any discrimination. We recognise our legal obligations under the [Equality Act 2010](#), where harassment or discrimination based on the following is unlawful in the UK - race, including colour, nationality, ethnic or national origin; religion or belief; disability; sex; sexual orientation; gender reassignment; age; being married or in a civil partnership; and being pregnant or on parental leave. We view this Act as a minimum legal requirement and aim to create a safe and proactive culture around DEI. We also operate to the DEI guidelines set out by the Charity Commission under the [Charity Governance Code](#).

As an organisation it is important for us to create an environment where all our employees, volunteers and young people are proud to work with EYF. They feel valued, respected, and have a sense of belonging.

The aim of this policy is to demonstrate our commitment to driving an inclusive culture and reducing the risk of discriminatory behaviour by:

- Clearly communicating EYF's responsibilities to our employees, our young people and our stakeholders
- Ensuring that EYF employees and its Trustees are clear of our responsibilities to colleagues, our young people, and our stakeholders
- Ensuring that EYF employees and its Trustees role model inclusive behaviours which are free from discrimination at all times

- Ensuring we are meeting our duty of care to the young people we serve - by keeping them safe and free from discrimination
- Providing a clear and transparent way for concerns and reports to be raised, in the instances where behaviour is non-inclusive
- Clearly communicating our duty to ensure any concerns are dealt with quickly and effectively

This policy runs alongside all existing EYF policies including the [Volunteering Policy](#), [Complaints Policy](#), [Whistleblowing Policy](#), [Ethical policy](#), and the [Child Protection Policy](#). This policy is also supported by the [EY Grievance Policy](#), the [EY Dignity at Work Policy](#) and the [EY Global Code of Conduct](#).

We recognise that DEI is an evolving area and acknowledge that we don't have all the answers. DEI progression is important to us, and we will continue to review our approach to contribute to building a fairer and more equal society. Therefore, we acknowledge that this policy will be a work in progress and will be reviewed annually.

2.3 Definitions

Our definitions of DEI are as follows:

Diversity is about championing differences. At EYF we value and respect individual differences, including, but not limited to; gender, ethnicity, background, education, nationality, generation, age, working style, religious background, sexual orientation, gender identity, ability, cognitive diversity, and technical skills.

Equity is about each person having access to the resources and opportunities they need, given different starting points and different needs. It also means removing barriers to opportunities and inclusive experiences that may lead to unequal outcomes.

Inclusiveness is about leveraging these differences to achieve better results. It is about creating an environment where each person feels valued and that they belong.

3. Responsibility

It is everyone's responsibility to maintain and foster an inclusive and non-hostile working environment when in the office, working virtually or when representing the EYF externally. We take the delivery of these responsibilities very seriously and provide the necessary training and/or support to ensure that the named persons are aware of, and fully understand their responsibilities.

3.1 Responsibilities of EYF employees include, but are not limited to:

- Respecting the dignity and diversity of all people
- Creating an inclusive environment that is free from discrimination, harassment, and bullying
- Completing prescribed DEI training. In particular, unconscious bias, inclusive leadership, and race learning, as part of our commitment to creating a culture of equity
- Committing to and meeting an individual goal as part of the annual goals and objective setting process to help EYF meet our DEI responsibilities

3.2 Responsibilities of the DEI Leader, HR, Senior Management, Leadership Teams and Trustees include - in addition to the above - but are not limited to:

- Committing to role modelling behaviours through:
 - Demonstrating inclusive and respectful behaviour
 - Valuing all perspectives and listening to diverse points of view, cultivating a culture that inspires respect for all the people we work with
- Ensuring that all individuals within our function areas set and meet their DEI annual goals and complete mandatory training
- Ensuring a work environment that is free from discrimination, harassment, and bullying
- Mitigating potential unconscious bias and discrimination in employment related decisions and talent practices (including performance and development, compensation, hiring)

- Acting on any wrongdoing that comes to our attention
- Creating and establishing appropriate processes e.g., training and making reasonable adjustments where required. What constitutes a reasonable adjustment depends on the facts and circumstances and is addressed on a case-by-case basis

4. Discrimination, Harassment and Bullying

EYF provides equal opportunities for employment. We base employment decisions on merit, considering qualifications, skills, performance, and achievements. We do not tolerate discrimination against any employee or applicant for employment based on non-work-related personal characteristics, such as race, religion, pregnancy (including childbirth or related medical conditions, as well as breastfeeding needs), gender, sexual orientation, gender identity or expression, transgender status, national origin, ethnic origin or background, social origin, family or marital status, age, disability (physical or mental), medical condition, genetic information, union membership, veteran's status, or military service. We provide reasonable accommodation to qualified individuals with a disability as well as individuals with needs related to their religious observance or practice. All of us have a right to work in an environment free from the demoralizing effects of harassment or unwelcome offensive or improper conduct. EYF will not tolerate harassment, bullying or conduct that could lead or contribute to harassment of employees by managers, supervisors, or co-workers.

We also will actively seek to protect employees from harassment or bullying by non-employees in the workplace. Similarly, EYF will not tolerate harassment or bullying by its employees or non-employees with whom our employees have a business, service, or professional relationship. This also extends to conduct that takes place outside of our offices (including on social media) that could reasonably impact employees, volunteers and young people or others within our workplace.

5. Reporting Process

We recognise the importance of encouraging and empowering anyone who has experienced any discriminatory, biased, or non-inclusive behaviour to come forward and feel safe to report, make it more difficult for people to act without consequence, and allow mediation to take place quickly and effectively.

5.1 Reporting inappropriate conduct

Whenever you believe that you or another individual has been subjected to conduct prohibited by this Policy, you are urged and expected to report the relevant facts promptly. You can make a report either orally or in writing. Concerns can be raised informally first via the DEI Leader, HR Manager and Leadership Team (see page 10 for contact details). **This applies to internal employees and external parties.*

As an alternative, the EY Ethics Hotline (see page 10 for contact details) provides a safe mechanism for anonymous reporting of suspected concerns, or potential violations of our policies or the law. It is independent, secure, and confidential and available 24 hours a day, 7 days a week. **This applies to internal employees and external parties.*

If it is not possible to resolve your complaint or concern informally, or you are dissatisfied with attempts to do so informally, you can raise the matter formally as a grievance by following the guidance and process in the [EY Grievance Policy](#) (**this applies to EYF employees*) or you can raise the matter following the guidance and process in [EYF Complaints Policy](#). **This applies to external parties, including EY employees).*

We take allegations of discrimination, harassment and bullying seriously and ensure they are fully investigated. All reported incidents will be investigated with an effort to keep the source of the report confidential, with the disclosure of information as appropriate to facilitate the investigation or resolution of the matter. EYF encourages employees, volunteers, and young people to report in good faith any possible violation of this Policy.

5.2 Prohibition of Retaliation

We will not tolerate threats or acts of retaliation of any kind against any individuals because they report conduct reasonably believed to violate this Policy, or in good faith provide information in connection with a report or investigation of any such conduct.

5.3 Consequences

Non-compliance with this Policy and/or engagement in discrimination, harassment or bullying will be subject to further investigation which may lead to disciplinary action.

- **EYF employee** - appropriate disciplinary action, up to and including termination of employment.
- **EYF non-employees** with whom our employees have a business, service, or professional relationship - appropriate disciplinary action, up to and including termination of verbal or written partnership agreement/programme engagement. Where applicable, the EY Foundation may make a referral to an associated party (e.g., an educational institution or employer).
- **EY employees** - appropriate investigations and disciplinary action will be conducted by the EY HR team.

Where the allegations are particularly serious or there is no doubt, and clear evidence, that an offence has been committed by an EYF employee or its' stakeholders, the appropriate services (e.g., criminal services where it is a criminal act) will be informed within one working day of the allegation being reported. A strategy for further action will then be agreed before a decision is taken as to notifying the person.

Informal reporting process

You have experienced or observed a discriminatory, biased, or non-inclusive behaviour.



You are unsure whether an incident is a case of discriminatory, biased, or non-inclusive behaviour.



If you feel comfortable doing so, share your concern with the person responsible. Be clear to them that their behaviour is inappropriate and explain why.



If you feel further assistance or support is required, then you can seek this from the **DEI leader or HR Manager or the Leadership Team**, who will come back to you within 3 working days (see page 10 for contact details).

OR

If you would like to anonymously seek assistance or support access the **EY Ethics hotline** (see page 10 for contact details) available to anyone inside or outside of EYF, to seek assistance **confidentially and anonymously**. You can ask a question or choose to raise your concern online or via the telephone.

**This option provides fully anonymous reporting*



If you feel your matter has not been resolved, then you can raise your concern through the formal complaints process via [EYF Complaints Policy](#) or [EY Grievance Policy](#)

Formal reporting process: raise a Grievance (*for EYF employees)

You have experienced or observed a discriminatory, biased, or non-inclusive behaviour and want to raise your concern. You are aware and/or have followed the informal reporting process but feel there is still an issue or when it is not appropriate for you to attempt to resolve the complaint informally (e.g., the nature of the complaint is serious in nature) and would like to raise a complaint or concern formally.
You can access the EY Grievance policy process [here](#) or follow the grievance process below.



Send an email to your manager clearly stating you wish the matter to be dealt with as a formal grievance (if your manager is the subject of your grievance, to the DEI Leader, HR Manager or Leadership Team - see page 10 for contact details)



Provide as much information as possible as per the EY Grievance Policy, including details of the grievance, names of those involved and any witnesses, any supportive evidence and set out any suggestions to resolve the grievance



The recipient will inform the HR Manager who will appoint a member of the Senior Management Team to hear your grievance and arrange a follow up meeting with you without unreasonable delay (and usually within 5 working days) to discuss the issue.
**You are entitled to be accompanied at a grievance meeting which deals with a complaint about a duty owed by the firm to you (see clause 3.3 p. of the Grievance policy [here](#) for full details)*



Following the meeting, action (if any) to take to resolve your grievance will be communicated to you in writing without unreasonable delay. If this is likely to be more than a few working days, this will be communicated to you

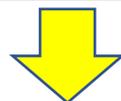


If you believe that your grievance has not been satisfactorily resolved you should appeal by bringing this to the attention of the Chief Executive, Lynne Peabody (or their nominee as specified in the grievance outcome letter), within 5 working days of receipt of the grievance outcome letter, outlining the grounds of your appeal.

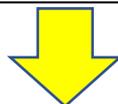
The person hearing your appeal will respond to you without unreasonable delay to arrange a date and location for the appeal meeting.
The appeal outcome will be notified to you in writing without unreasonable delay, and the decision will be final.

Formal reporting process (*for external parties, including EY employees)

You have experienced or observed a discriminatory, biased, or non-inclusive behaviour and want to raise your concern. You are aware and/or have followed the informal reporting process but feel there is still an issue and would like to raise a complaint. You can access the EY complaint policy process [here](#) or follow the complaint process below.



Send an email or letter to the relevant designated complaints handling offers (see page 10 for contact details)



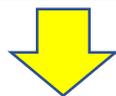
Provide as much information as possible, including the reason for your complaint, where and when the cause for complaint arose, names of those involved (if known), what outcome you are hoping for and, your contact details



A designated complaints handling officer will acknowledge receipt of a written complaint within 5 working days and a full reply within 28 working days. Where your complaint is complex, it may not be possible to send a full reply within 28 working days, you will be informed of the reason why and when you may expect a reply in full, keeping you informed of any progress.



If you are not happy with the response given to your complaint you can bring this to the attention of the Chief Executive, Lynne Peabody. Please write to or email Lynne at lpeabody@eyfoundation.ey.com with details of the complaint, setting out the specific reasons why you are dissatisfied with the initial response and how you believe matters should be addressed. You can expect a formal response within a calendar month of receipt of your communication.



If you remain unhappy after this second review you may notify the Chief Executive who will escalate this further to EYF's Chair, or email foundationboard@eyfoundation.ey.com directly, which is the final stage of our escalation process.

6. Key Contacts

Job Role	Name	Contact Numbers	Email Address
CEO (Leadership Team)	Lynne Peabody	0207 951 5803 or 07468 740 282	lpeabody@eyfoundation.ey.com
CFO (Leadership Team & Designated Complaints Officer)	Liz Crossley	020 7951 3133	liz.crossley@eyfoundation.ey.com
Chief Programmes Officer (Leadership Team & Designated Complaints Officer)	Jodie McNally	0161 234 6425 or 07342 022 130	jodie.mcnally1@eyfoundation.ey.com
Director of Communications & Influence (Leadership Team & Designated Complaints Officer)	Ewan Bennie	0207 951 3712 or 07557 860645	Ewan.Bennie@eyfoundation.ey.com
Director of Income & Employer Partnerships (Leadership Team & Designated Complaints Officer)	Kathryn Eastwood	020 7951 3133	Kathryn.Eastwood@eyfoundation.ey.com
DEI Leader (Senior Management Team & Designated Complaints Officer)	Anu Law	0207 783 0611 or 07833 286 912	Anu.Law@eyfoundation.ey.com
HR People & Development Manager	Fabiana Borrelli	020 7980 9167 or 020 7785 8859	fabiana.borrelli@eyfoundation.ey.com
	EY Ethics Hotline	0800 088 5542	www.eyethics.com
	EY Foundation 1 More London Place London SE1 2AF United Kingdom	0207 951 3133	concerns@eyfoundation.ey.com

Independent complaints bodies:

1. Acas - [Contact us | Acas](#)
2. Independent external party - [Charity Commission](#)
3. Fundraising complaints - [the Fundraising Regulator](#)
4. Advertising complaints - [Advertising Standards Authority](#)
5. Other serious complaints: <https://forms.charitycommission.gov.uk/raising-concerns/>