



Culture and Inclusion Policy

Approved December 2024

Amendment History:

Version	Date	Change	Main Author
Dec 2022	02.10.23	Contact Information table (p.11) updated to reflect team and role changes. Inclusion of links to relevant policies for further information.	Anu Law
Dec 2022	22.10.2024	<ul style="list-style-type: none">• Contact Information table (p.11) updated to reflect changes in team.• General wording review of some clauses to be consistent with other HR policies• Added reference to the EY UK Dignity Policy and EY Culture Shift tool• Amendments made to ensure alignment with the new duty on employers to take 'reasonable steps' to prevent sexual harassment due to the Worker Protection (Amendment of Equality Act 2010).	Jane Cubbin

Contents

1. Introduction	3
2. The Policy	3
3. Responsibility	4
4. Discrimination, Harassment and Bullying	5
5. Reporting Procedure	5
6. Outcome	7
9. Appendices: Process Maps	9
10. Key Contacts.....	12
11. Definitions	13

1. Introduction

The EY Foundation (EYF) helps young people facing barriers to entering the workplace. 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

At the EY Foundation we value the strength of difference in thought and perspective. We are committed to creating an inclusive environment where everyone feels respected, valued and empowered regardless of their background, identity or position.

2. The Policy

2.1. Who this policy applies to

This policy applies to all our EYF staff members: (part-time and full-time, permanent and fixed term contract (FTC)), consultants, agency employees, contractors, seasonal employees, apprentice and interns.

Additionally, this policy applies also to the Board of Trustees, Youth Advisory Board (YAB), volunteers, our Young People who attend our programmes. For the avoidance of any doubts, this policy applies to anyone collaborating with the EYF in a paid or in a voluntary 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 \(Act\)](#), 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 everyone is proud to work or collaborate with EYF ensuring they feel valued, respected, and have a sense of belonging.

The aim of this policy is to demonstrate our commitment to embedding 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](#).

In addition, for EYF staff this policy is also supported by the [EY Grievance Policy](#), the [EY Dignity at Work Policy](#), [EY Diversity, Equity and Inclusiveness Policy](#) and the [EY Global Code of Conduct](#).

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 everyone is aware of, and fully understand their responsibilities.

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

- Everyone has responsibility for ensuring that they understand the terms and principles of this policy.
- Everyone is committed to being a role model 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.
- Creating an inclusive environment that is free from discrimination, harassment, and bullying
- The EYF expects and tracks all staff members to complete prescribed DEI training. In particular, unconscious bias, inclusive leadership, hiring and race learning, as part of our commitment to creating a culture of equity.
- Everybody should be clear on what constitutes harassment, bullying, victimisation or microaggressions.

3.2. Responsibilities of the People Team, Leadership Team, Line Managers, and Trustees include - in addition to the above - but are not limited to:

- Every Trustee, leader, senior manager and manager have the responsibility to ensure that the policy is fully implemented

- Ensuring that all individuals within our function areas complete mandatory training
- 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, competencies and performance.

We do not tolerate discrimination against any employee, applicant for employment or any of our young people and stakeholders, and we are committed to establishing an inclusive environment free from unlawful discrimination, with policies and procedures that produce equitable results. We are committed to treating our staff members and job applicants fairly and equitably, regardless of their sex, gender identity, gender reassignment, marital or civil partnership status, race, ethnic or national origin, disability, religion, sexual orientation, age, or pregnancy/maternity status. No job applicant or staff member or beneficiary will receive unfair treatment on any protected grounds.

If business needs allow, we may 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, or co-workers.

We also will actively seek to protect employees and our young people and stakeholders 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 Procedure

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. How to make a complaint for EYF Staff

If you believe that you or another individual has been subjected to conduct prohibited by this policy, you are strongly encouraged and expected to report the relevant facts promptly.

While it is not necessary to have all the details at the time of raising your concerns, it is advisable to be as prepared as possible and provide as many of the following details as you can:

- the name of the person to whom the complaint relates.
- the nature of the harassment, bullying or victimisation;

- dates and times and places when it occurred.
- copies of any relevant emails, text messages etc.
- names of possible witnesses, if any.

5.1.1. Reporting channels for EYF Staff

Concerns can be raised via the People Team (Head of People and DEI Specialist) and Leadership Team.

As an alternative you can use the following EY Tools:

- you can use [Culture Shift](#) (see page 17 for contact details), the intention of this tool is to provide people with a safe route to report cultural concerns and behaviours that are not in line with our EY values.
- the EY Ethics Hotline (see page 17 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.

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](#).

The EY Foundation takes all concerns raised, whether formally or informally, seriously and will take reasonable and practicable steps to ensure that the matter is properly investigated and resolved in line with this policy and the EY UK Dignity at Work Policy. People can raise concerns at any time. However, ideally, concerns should be raised as soon as reasonably practicable, in order to ensure that investigations are prompt and any evidence is more readily available. That said, all matters will be fully investigated (as far as practicable) whenever they are brought to the EY Foundation's attention.

EYF encourages employees to report in good faith any possible violation of this Policy.

5.1.1.1. Approaches for dealing with complaints for EYF Staff

5.1.1.1.1. Informal

If you consider the issue to be minor or believe the individual may be unaware that their behaviour is inappropriate, you may choose to address the matter informally by speaking directly to the person involved. While there is no obligation to resolve the issue personally, doing so may lead to a quick and efficient resolution. If you feel comfortable, we encourage you to address the issue privately.

However, if you do not feel comfortable addressing the issue directly, you can seek support from others to help resolve the matter informally. You can contact a member of the EYF People Team, your Line Manager, or a member of the Leadership Team. They will support you and help resolve the issue in a way that makes you feel more comfortable.

5.1.1.1.2. Formal

In some cases, it may not be appropriate to resolve the complaint informally. Examples include:

- Serious harassment or bullying

- You do not feel it is appropriate to attempt an informal resolution
- There is a potential risk that the behaviour may continue, worsen, or affect others
- You believe the individual would not acknowledge any wrongdoing
- Previous informal attempts have failed to change the behaviour

When matters are raised formally (please refer to EY's Grievance Policy), an Investigator will be appointed in accordance with the EY UK Dignity at Work Policy. The Investigator will be supported by a member of the EY CBS Talent and EYF HR teams.

5.2. Procedure for External Parties

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 verbally or in writing. Concerns can be raised informally first via the one of the members of the Leadership Team, or the Head of People or DEI Specialist.

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 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.

As an alternative, the EY Ethics Hotline 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.

6. Outcome

Non-compliance with this Policy and/or engagement in discrimination, harassment or bullying will be subject to further investigation which may lead to the following consequences:

- **EYF employee** - If an EYF employee is found to have harassed, bullied, or victimised another person, disciplinary action may be taken in accordance with [EY's Disciplinary Policy](#) and could result in dismissal. Other possible sanctions include written warnings, demotion, or transfer to another team. Serious or repeated offenses may constitute gross misconduct, leading to summary dismissal.
- **EYF non-employees** with whom our employees have a business, service, or professional relationship - appropriate 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** are required to adhere to [EY HR Policies](#) and any issue will be handled by the relevant EY Talent Team.

In all cases, 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.

7. Monitoring

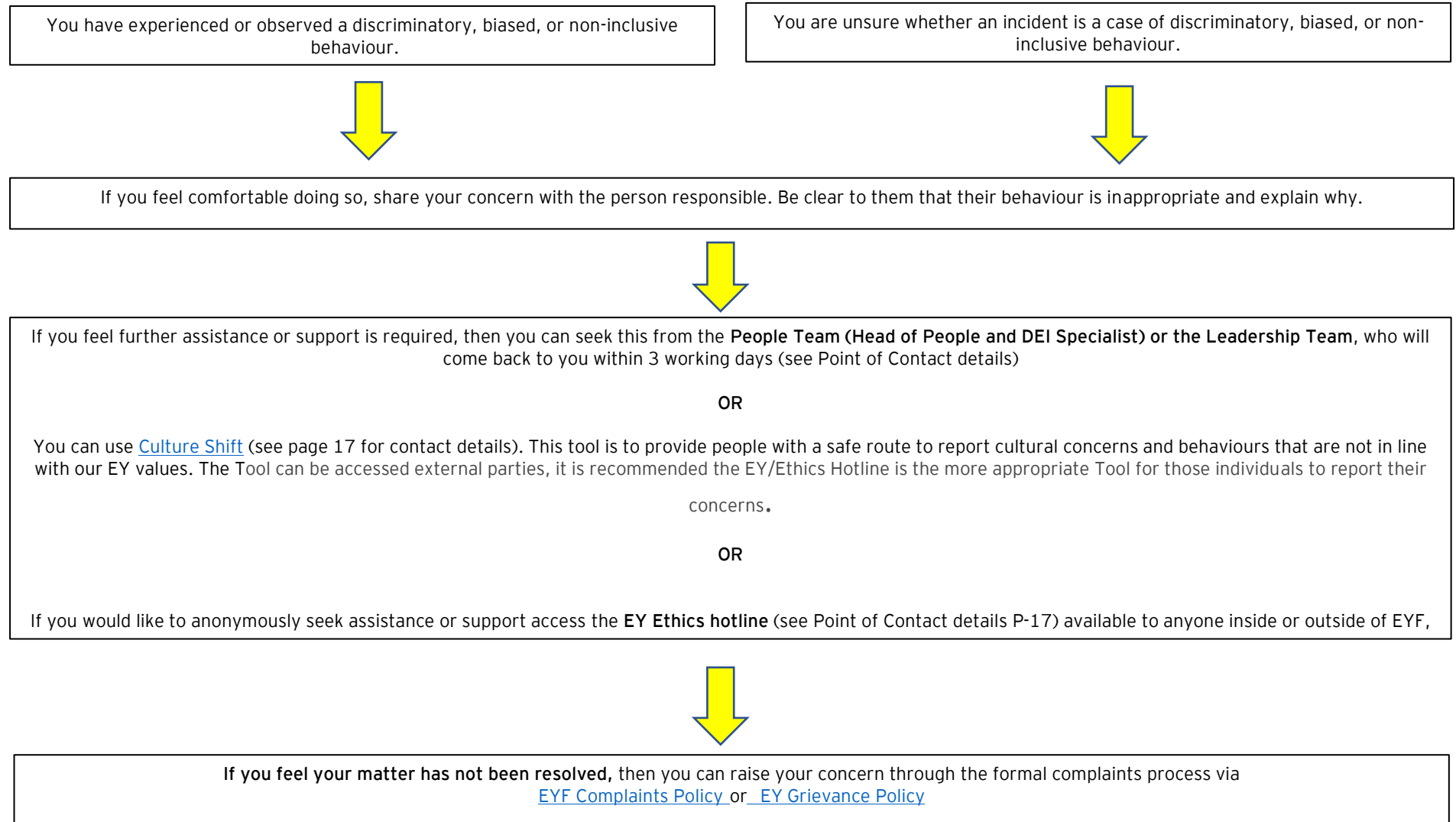
We take allegations of discrimination, harassment, and bullying seriously and ensure they are fully investigated. All reported incidents will be investigated with efforts to maintain confidentiality, disclosing information only as necessary to facilitate the investigation or resolution.

8. Amendments for EYF Staff

Our policies do not form part of your contract of employment. The EY Foundation reserves the right to change or terminate the terms of the policy at its absolute discretion. This policy will be reviewed annually.

9. Appendices: Process Maps

Informal reporting process



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, People Team (Head of People and DEI Specialist) or Leadership Team (see 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 Head of People who will appoint an Investigator 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.

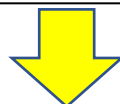
The person hearing your appeal will respond to you without unreasonable delay to arrange a date and location for the appeal meeting.
The appeal outcome will be notified to you in writing without unreasonable delay, and the decision will be final.

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 EYF complaint policy process [here](#) or follow the complaint process below.



Send an email or letter to the relevant designated complaints handling offers (see P17 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.

10. Key Contacts

Job Role	Name	Telephone	Email Address
CEO (Leadership Team)	Lynne Peabody	0207 951 5803	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
Head of People	Fabiana Borrelli	020 7980 9167 or 020 7785 8859	fabiana.borrelli@eyfoundation.ey.com
DEI Specialist (Designated Complaints Officer)	Jane Cubbin	0161 333 2589 or 07837 646633	Jane.Cubbin@eyfoundation.ey.com
	EY Ethics Hotline	0800 088 5542	www.eyethics.com
	EY Culture Shift		Report and Support Portal
EY Foundation	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/>

11. Definitions

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.

Belonging is about the feeling that each person has when they are included as their authentic selves. It is about being part of a supportive environment where differences are embraced, voices heard, people are respected for who they truly are, so that everyone can contribute fully and feel connected to EYF's mission and goals.

Harassment, In line with the Equality Act 2010, harassment is defined as unwanted conduct related to a protected characteristic (such as age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation) that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Unwanted behaviour in this context is any conduct not encouraged or reciprocated by the recipient. It must violate someone's dignity or create a degrading, humiliating, hostile, intimidating, or offensive environment. Examples include banter, spoken or written words, social media posts, imagery, GIFs, graffiti, physical gestures, facial expressions, mimicry, mocking, jokes, or pranks.

Sexual Harassment is any unwanted conduct of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. This behaviour does not need to be directed at a specific individual and can affect anyone who witnesses it.

Examples of sexual harassment include, but are not limited to:

- Unwanted physical contact, such as massaging, touching, hugging, or kissing
- Inappropriate comments or jokes about someone's appearance, body, or sexual activities
- Sending or displaying sexually explicit materials, such as emails, texts, or images
- Making sexual advances or propositions
- Staring or leering in a way that makes someone feel uncomfortable
- Any other unwelcome behaviour of a sexual nature that affects the work environment
- Making promises in return for sexual favours
- Intrusive questions about a person's private or sex life, or discussing one's own sex life
- Sexual posts or contact on social media
- Spreading sexual rumours about a person

Less favourable treatment for rejecting or submitting to unwanted conduct occurs when an individual is treated less favourably for rejecting or submitting to unwanted conduct of a sexual nature or related to sex or gender reassignment. The conduct must violate the individual's dignity or create an intimidating, hostile, degrading, humiliating, or offensive environment.

Bullying is defined as repeated behaviour by an individual or group that intentionally hurts another individual or group, either physically or emotionally. This behaviour may not be related to age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation (which may be harassment, see above).

Key characteristics of bullying include: a) Repetition: The behaviour occurs more than once. b) Intentional harm: The actions are meant to cause distress or harm. c) Imbalance of power: The person being bullied feels powerless to stop the behaviour. d) Impact: The behaviour causes feelings of distress, fear, loneliness, or lack of confidence.

Bullying behaviours can include physical, verbal, emotional, and cyberbullying.

Victimisation occurs when someone is treated less favourably because they have performed or intend to perform a "protected act" under the Equality Act 2010. Examples of protected acts include making a complaint of discrimination or harassment, or helping someone else with such a complaint (e.g., gathering information or acting as a witness).