



Equality, Diversity and Inclusion (EDI) Policy

Reference Number	Version	Status	Sponsor(s)/Author(s)
EDI001	1.0	Final	P.Godbole
Document objectives: This policy sets out how Pioneer Healthcare Limited (PH) will eliminate discrimination, advance equality of opportunity and foster good relations between people who share protected characteristics and those who do not			
Intended Recipients: All clinical, allied healthcare staff, contractors and non clinical staff			
Approving Body		Executive Board on 25 th June 2026	
Review Date		June 2028	

The table below logs the history of the steps in development of the document.

Version	Date	Author	Comment
1.0	May 2026	P.Godbole	New policy

1. Introduction

Pioneer Healthcare Limited is committed to creating and sustaining an environment in which all patients, service users, contractors, employees and partners are treated fairly, with dignity and respect. Equality, diversity and inclusion are fundamental to safe, effective and compassionate healthcare and support the organisation's values, clinical governance arrangements and commitment to high quality care.

As an independent healthcare provider delivering NHS and independent sector services, Pioneer recognises that equitable access, culturally competent care and inclusive employment practices contribute directly to improved patient outcomes, staff wellbeing and organisational performance.

2. Purpose

The purpose of this policy is to describe how Pioneer will eliminate discrimination, advance equality of opportunity and foster good relations between people who share protected characteristics and those who do not.

The policy provides the framework through which equality considerations are embedded within governance, recruitment, procurement, service design, patient pathways, incident management and quality improvement activities.

3. Scope

This policy applies to all permanent employees, contractors, consultants, agency staff, bank workers, students, volunteers, executive directors, non-executive advisers and third-party suppliers acting on behalf of Pioneer Healthcare Limited.

4. Legislative Framework

Pioneer operates in accordance with the Equality Act 2010, Human Rights Act 1998, Health and Social Care Act 2012, NHS Accessible Information Standard, Workforce Race Equality Standard, Workforce Disability Equality Standard and the CQC Single Assessment Framework.

The organisation recognises the Public Sector Equality Duty principles and voluntarily applies these standards to its activities despite not being a statutory public authority.

5. Protected Characteristics

Pioneer prohibits discrimination on the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The organisation also recognises the additional barriers experienced by carers, veterans, socially deprived populations, homeless individuals, refugees, asylum seekers and those with limited health literacy.

6. Roles and Responsibilities

The Board of Directors retains overall accountability for equality performance and receives annual reports on workforce and patient equality indicators.

The Chief Executive Officer provides executive accountability while the Medical Director acts as executive sponsor for equality and inclusion within clinical services.

Service Managers are responsible for implementation within operational services and ensuring that equality impact assessments are completed where required.

All staff and contractors have an individual responsibility to challenge discrimination and to contribute to an inclusive culture.

7. Recruitment and Workforce Equality

Recruitment and promotion decisions shall be based solely on objective criteria including competence, experience and values.

Pioneer will provide fair access to training, leadership opportunities and professional development regardless of protected characteristics.

Reasonable adjustments will be made throughout recruitment and employment processes to support disabled applicants and employees.

Bullying, harassment and victimisation will not be tolerated and concerns may be raised through line management, Freedom to Speak Up routes or formal grievance processes.

8. Service Delivery and Patient Access

Pioneer will ensure services are designed to maximise accessibility and minimise barriers to care.

Patients requiring interpretation services, translation support, accessible information formats or reasonable adjustments will have these needs identified and addressed at the earliest opportunity.

Clinical teams will consider cultural, religious and communication needs when planning and delivering care.

9. Accessible Information Standard

The organisation will comply with the Accessible Information Standard by identifying, recording, flagging, sharing and meeting communication requirements for individuals with disabilities, sensory impairments or communication needs.

Alternative formats may include large print, easy read information, electronic formats, interpretation services and communication support.

10. Equality Impact Assessments

Equality Impact Assessments will be completed for new policies, significant service developments, procurement exercises and major operational changes.

Assessments will consider potential impacts on protected groups and identify mitigations where unintended disadvantage is identified.

11. Procurement and Contractor Management

Pioneer expects suppliers, subcontractors and partner organisations to demonstrate compliance with equality legislation and equivalent standards.

Equality considerations will form part of procurement evaluation, due diligence and contract monitoring activities.

12. Education and Training

Equality, Diversity and Human Rights training forms part of mandatory training requirements and will be completed in accordance with the organisational training matrix.

Additional training may be provided on unconscious bias, cultural competence, inclusive leadership and accessible communication.

13. Incident Reporting and Freedom to Speak Up

Discrimination, harassment, bullying or exclusion incidents affecting staff or patients will be reported through the Pioneer governance and incident management system.

Themes and trends will be reviewed by the Clinical Governance Committee and escalated to the Board where appropriate.

Staff are encouraged to raise concerns through Freedom to Speak Up processes without fear of detriment or retaliation.

14. Monitoring and Assurance

The organisation will monitor workforce demographics, complaints, incidents, patient feedback and recruitment data to identify inequalities and opportunities for improvement.

Key indicators may include training compliance, complaint themes, workforce diversity and accessibility measures.

15. Equality Objectives 2026-2029

1. Maintain greater than 95 percent compliance with Equality, Diversity and Human Rights training.
2. Ensure all patient information can be provided in accessible formats where required.
3. Monitor incidents and complaints for equality themes and evidence learning.
4. Improve diversity representation within leadership and governance structures.
5. Demonstrate compliance with the Accessible Information Standard across all services.

16. Related Policies

This policy should be read alongside the Clinical Governance Policy, Recruitment Policy, Freedom to Speak Up Policy, Complaints Policy, Incident Management Policy, Safeguarding Policy, Information Governance Policy and Interpretation and Translation Services Policy.

Appendix A - Equality Impact Assessment Template

Describes the proposed change, identify affected groups, assess actual or potential impacts, identify mitigations, document consultation and record approval arrangements.

Appendix B - Protected Characteristics Reference Guide

Managers should consider each protected characteristic when undertaking impact assessments or making service decisions.

Appendix A – Equality Impact Assessment (EQIA) Template

Pioneer Healthcare Limited

Equality Impact Assessment (EQIA)

Section

Details

Policy, Procedure or Project Title

Department / Service Area

Policy Owner / Lead Officer

Date of Assessment

Version Number

Review Date

Assessment Completed By

Approved By

1. Description of the Proposal

Provide a brief description of the policy, service change, project or decision being assessed.

Summary:

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2. Reason for the Assessment

Please tick as appropriate:

- ☐ New Policy
- ☐ Policy Review
- ☐ Service Redesign

- ☐ Procurement Exercise
- ☐ Organisational Change
- ☐ New Clinical Service
- ☐ Other

If other, please specify:

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3. Who Will Be Affected?

Please identify who may be affected by this proposal:

- ☐ Patients
- ☐ Carers
- ☐ Staff
- ☐ Contractors
- ☐ Consultants
- ☐ Commissioners
- ☐ Suppliers
- ☐ Members of the Public
- ☐ Other

4. Evidence Considered

List the evidence used to inform the assessment:

- Incident reports
- Complaints and concerns
- Patient feedback
- Audit findings
- Workforce data
- National guidance
- Equality monitoring data
- Consultation responses
- Service activity data

Evidence used:

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5. Assessment Against Protected Characteristics

Protected Characteristic	Potential Impact Identified?	Positive	Negative	Neutral	Actions Required
Age	Yes / No	☐	☐	☐	
Disability	Yes / No	☐	☐	☐	
Gender Reassignment	Yes / No	☐	☐	☐	
Marriage/Civil Partnership	Yes / No	☐	☐	☐	
Pregnancy and Maternity	Yes / No	☐	☐	☐	
Race	Yes / No	☐	☐	☐	
Religion or Belief	Yes / No	☐	☐	☐	
Sex	Yes / No	☐	☐	☐	
Sexual Orientation	Yes / No	☐	☐	☐	

6. Additional Inclusion Groups

Pioneer also considers impacts on:

Group	Impact Identified? Actions Required
Carers	Yes / No
Veterans	Yes / No
Homeless Individuals	Yes / No
Refugees and Asylum Seekers	Yes / No
People with Limited Health Literacy	Yes / No

Group	Impact Identified? Actions Required
Socio-economically Disadvantaged Groups	Yes / No
Rural or Geographically Isolated Communities	Yes / No

7. Accessible Information Standard

Will the proposal impact communication needs?

Question	Yes	No
Large print required?	☐	☐
Easy Read versions required?	☐	☐
Interpretation services required?	☐	☐
British Sign Language support required?	☐	☐
Alternative communication methods required?	☐	☐

Actions:

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8. Mitigating Actions

Describe actions required to reduce or remove any identified inequalities.

Action Owner Target Date

9. Consultation Undertaken

Who has been consulted?

- ☐ Staff
- ☐ Patients
- ☐ Contractors
- ☐ Commissioners
- ☐ Clinical Governance Committee
- ☐ Board of Directors

Summary of feedback:

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10. Overall Assessment Outcome

- ☐ No impact identified.
- ☐ Positive impact identified.
- ☐ Negative impact identified but adequately mitigated.
- ☐ Significant negative impact identified requiring escalation to the Board.

11. Approval

Name	Role	Signature	Date
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	Assessor		
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	Line Manager		
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	Executive Lead		
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Appendix B – Protected Characteristics and Inclusion Groups Guidance

Protected Characteristics under the Equality Act 2010

Age

Protection against discrimination based upon age or age group.

Disability

A physical or mental impairment that has a substantial and long-term adverse effect on normal daily activities.

Examples include:

- Mobility impairments
- Sensory impairment
- Learning disabilities
- Mental health conditions
- Neurodiversity
- Long-term medical conditions

Pioneer will make reasonable adjustments wherever required.

Gender Reassignment

Protection for individuals proposing to undergo, undergoing or having undergone gender reassignment.

Marriage and Civil Partnership

Protection from discrimination in employment on the grounds of marriage or civil partnership status.

Pregnancy and Maternity

Protection during pregnancy, maternity leave and breastfeeding.

Race

Includes:

- Colour
- Nationality
- Ethnic origin

- National origin

Religion or Belief

Includes religious belief, philosophical belief and absence of belief.

Sex

Protection against discrimination on the basis of being male or female.

Sexual Orientation

Protection relating to sexual orientation including heterosexual, homosexual and bisexual orientation.

Inclusion Health Groups

Pioneer recognises that health inequalities can exist outside the statutory protected characteristics and therefore also considers:

- Carers
- Veterans
- Refugees and asylum seekers
- Homeless individuals
- People with substance misuse disorders
- Gypsy, Roma and Traveller communities
- Individuals experiencing social deprivation
- People with limited health literacy
- People living in rural or geographically isolated communities

Reasonable Adjustments

Examples include:

- Interpreter provision
- British Sign Language interpreters
- Large print documentation
- Easy Read information
- Hearing loop facilities
- Flexible appointment arrangements
- Longer appointment times
- Carer involvement where appropriate
- Accessible venues

Accessible Information Standard

Pioneer will:

1. Identify communication needs.
2. Record communication needs.
3. Flag communication needs.
4. Share communication needs appropriately.
5. Meet communication needs consistently.

Equality Objectives 2026–2029

Pioneer Healthcare aims to:

1. Maintain >95% EDI training compliance.
2. Ensure accessible information is available across all services.
3. Monitor equality themes in incidents and complaints.
4. Promote workforce diversity.
5. Demonstrate compliance with the Accessible Information Standard.
6. Incorporate EQIAs into all major organisational decisions.