

EQUALITY, DIVERSITY AND INCLUSION POLICY

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Trustee responsible	Pete Flamman
Staff responsible	Susie Newbery
Frequency of policy review	1 year

1. INTRODUCTION

The policy outlines Complicité's commitment to encouraging Equality, Diversity and Inclusion (EDI) among its workforce and eliminating unlawful discrimination. Complicité is committed to advancing EDI across all aspects of our work. We recognise that promoting diversity and challenging inequality are essential to artistic innovation, creative excellence and organisational sustainability.

We acknowledge the historic and ongoing systemic inequities within the UK arts and cultural sector, including systemic racism, ableism, class inequality and the underrepresentation of many communities. We are committed to addressing these structural barriers and ensuring that our organisation reflects and serves the full diversity of society.

Our aim is to create a welcoming, accessible and inclusive environment where differences are valued, power is shared more equitably, and everyone feels respected, safe and able to contribute fully.

This policy will be reviewed annually and updated in line with evolving legislation, sector guidance and best practice.

We will report against measurable actions and targets annually at Board meetings, working to a 3-year action plan.

2. PURPOSE

This policy aims to:

- Provide equality, fairness and respect for all in our employment practices, artistic activities and public engagement.
- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity.
- Foster good relations between people who share protected characteristics and those who do not.
- Embed inclusive and anti-discriminatory practice across governance, programming, recruitment and organisational culture.

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- We recognise that discrimination can be direct or indirect, conscious or unconscious, institutional or interpersonal, and that individuals may experience multiple and intersecting forms of discrimination (intersectionality).

3. SCOPE

This policy applies to all:

- Employees (full-time, part-time, temporary)
- Freelancers, contractors, and artists
- Trustees and volunteers
- Audience members and participants in our creative engagement programmes

4. LEGAL FRAMEWORK

Complicité will comply with all relevant equality legislation and statutory guidance, including but not limited to:

- The Equality Act 2010
- The Public Sector Equality Duty (Equality Act 2010, s.149), where applicable to funded activities. (While Complicité is not a public authority and therefore not legally bound by the Public Sector Equality Duty, we seek to align our work with its principles of eliminating discrimination, advancing equality of opportunity and fostering good relations.)
- The Human Rights Act 1998
- The Employment Rights Act 1996
- The Rehabilitation of Offenders Act 1974
- The Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- The Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- The Work and Families Act 2006
- The Equality and Human Rights Commission (EHRC) Statutory Code of Practice on Employment
- Any subsequent amendments or relevant legislation relating to discrimination in employment and the provision of goods, facilities and services

Under the Equality Act 2010, we will not unlawfully discriminate on the basis of the following protected characteristics:

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

In addition, while not all are protected characteristics under the Equality Act 2010, Complicité is committed to preventing discrimination on the grounds of:

- Socio-economic background and class
- Political opinion or activity
- Trade union membership

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- Care responsibilities
- Neurodivergence and mental health status

4.1 Anti-Racism and Representation

We recognise systemic racism within the arts sector and commit to actively challenging racial inequity in our structures, recruitment, programming and partnerships.

By 'underrepresented' we refer to people who are ethnically diverse, from socio-economically disadvantaged backgrounds, D/deaf and/or disabled, neurodivergent, LGBTQIA+, or who have experienced racism or other forms of structural marginalisation.

Wherever possible, we will interrogate decision-making processes in casting, recruitment, commissioning and leadership to ensure we are making proactive, inclusive choices rather than defaulting to established norms.

4.2 Disability and the Social Model

We adopt the social model of disability, recognising that people are disabled by barriers in society rather than by their impairment or difference. These barriers may be physical, attitudinal, organisational or systemic. Neurodivergence may fall within the definition of disability under the Equality Act 2010 where it has a substantial and long-term impact on daily activities.

We will:

- Remove or reduce barriers wherever reasonably practicable.
- Provide reasonable adjustments in recruitment, employment and participation.
- Ensure that our physical, digital and sensory environments are accessible, including working towards and maintaining WCAG 2.1 AA standards (or latest applicable standards).
- Seek external expertise where needed to improve accessibility.

4.3 Positive Action

Where lawful and proportionate under sections 158–159 of the Equality Act 2010, we may take Positive Action to:

- Encourage applications from underrepresented groups.
- Provide targeted training, mentoring, apprenticeships or development programmes.
- Address disadvantage or underrepresentation in specific areas of the organisation.

All Positive Action measures will be evidence-based, proportionate and compliant with the law.

5. PROHIBITED CONDUCT

We do not tolerate:

- Direct discrimination - where someone is treated less favourably than another because they have a protected characteristic
- Indirect discrimination – when a requirement or a condition is applied which has a detrimental effect on a particular group or individual. This applies even if there was not a deliberate intention to discriminate.
- Associative discrimination – direct discrimination against someone because they associate with another person who has a protected characteristic.
- Perceptive discrimination - direct discrimination against someone because others think they have a protected characteristic even if they do not possess that characteristic.

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- Harassment – unwanted conduct related to a protected characteristic that violates a person’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them. This applies even if the conduct is not directed at the individual or if they do not have the protected characteristic.
- Third party harassment - harassment of staff, freelancers or participants by individuals who are not employees of the organisation, such as audiences, collaborators, contractors or partners. Complicité will take reasonable steps to prevent such behaviour and respond appropriately where it occurs.
- Victimisation – when someone is treated badly because they have made or supported a complaint under the Equalities Act or it is thought that they have done so.
- Microaggressions - behaviours that may contribute to hostile or exclusionary environments and may be addressed under the organisation’s harassment or bullying procedures.
- Bullying - The repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological.

Serious or deliberate breaches of this policy may constitute gross misconduct and may result in disciplinary action, up to and including dismissal or termination of contract.

6. RECRUITMENT AND EMPLOYMENT PRACTICES

We are committed to fair, transparent and inclusive recruitment and employment practices. We will:

- Advertise roles widely and in ways that reach underrepresented communities.
- Use inclusive, accessible language in job descriptions and marketing.
- Focus on essential criteria and recognise equivalent experience.
- Offer alternative formats and reasonable adjustments at all stages.
- Avoid unlawful pre-employment health questions except where permitted by law.
- Use anonymised shortlisting where practicable.
- Ensure selection decisions are based on merit against objective criteria.

Where a Genuine Occupational Requirement applies, for example in specific artistic casting contexts, this will be clearly stated and justified.

7. PAY AND FAIR WORK

Complicité is committed to fair and equal pay for work of equal value, in line with UK law. We:

- Adhere to relevant collective agreements through our membership of UK Theatre and engagement with recognised trade unions (including Equity, BECTU and the Writers’ Guild of Great Britain).
- Regularly review pay practices to identify and address disparities.
- Promote transparency and fairness in fee-setting and contracting practices.
- Support flexible working and family-friendly policies in line with current legislation.
- Are an Accredited Living Wage Employer.

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Complicité recognises that women and men in the workforce should receive equal pay for work of equal value and that this principle is enshrined in both UK and European law.

The organisation aims to ensure that its pay system is free of bias. Fairness and equality across gender, age, race and disability are integral to the Company's values.

Complicité's values send a positive message on diversity and equality to managers, employees, potential employees, partners and customers and enhance productivity, efficiency and morale.

8. ARTISTIC PROGRAMMING AND ENGAGEMENT

We will ensure that our artistic programming, partnerships and creative engagement work reflect the diversity of the communities we serve. This includes:

- Commissioning and collaborating with artists from underrepresented backgrounds.
- Ensuring accessible performances and engagement opportunities.
- Considering access and inclusion at the earliest stages of project development.
- Engaging in dialogue with communities to shape relevant and responsive work.

We will not unlawfully discriminate in the provision of goods, services or facilities.

9. RESPONSIBILITIES

The Board of Trustees

- holds overall accountability for this policy. Trustees are responsible for ensuring the charity operates in compliance with equality law and for monitoring organisational progress against equality objectives.
- monitor progress and review policy effectiveness annually.

Executive Leadership and Senior Management

- are responsible for implementation and embedding EDI across the organisation.
- lead by example and set behavioural expectations.
- ensure managers receive appropriate training.

Managers

- Communicate and apply this policy.
- Address concerns from direct line reports promptly and appropriately.
- Ensure recruitment and management decisions align with this policy.

All Staff, Freelancers and Trustees

- Must treat others with dignity and respect.
- Must not engage in discriminatory behaviour.
- Must challenge inappropriate behaviour where safe to do so.
- Must not victimise anyone who raises concerns.

10. COMPLAINTS AND REPORTING

We take all complaints of discrimination, harassment or victimisation seriously. All complaints will be handled sensitively, promptly and confidentially where possible. Victimisation of anyone raising a genuine concern is prohibited. Malicious or knowingly false allegations may result in disciplinary

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action.

- Internal complaints will be handled under our Grievance, Dignity at Work and Disciplinary Procedures.
- External complaints will be addressed through our Complaints Procedure.

Complaints will be monitored annually and any outcomes/action recorded.

11. MONITORING AND REVIEW

To ensure accountability and continuous improvement, we will:

- Collect and analyse equality monitoring data (Equality monitoring data will be collected and processed in accordance with UK GDPR and the Data Protection Act 2018.)
- Monitor diversity across recruitment, workforce makeup, governance, programming and audiences.
- Maintain and review an Equality Action Plan with measurable objectives.
- Consult regularly with staff, freelancers and stakeholders.
- Report progress to the Board annually.

The policy will be reviewed annually and updated to reflect legislative changes and sector best practice.