Equality, Diversity and Inclusion Strategy 2021-26

GambleAware
April 2022
Foreword

In April 2021, GambleAware published its new Organisational Strategy 2021-2026 which set out a clear vision for a society which is safe from gambling harms. New commissioning objectives and strategic priorities were set, including the objective to increase access to services to reduce gambling harm inequalities. Evidence suggests inequalities exist when it comes to the likelihood of experiencing gambling harms\(^1\), as well as access to treatment and support\(^2\), and the Covid-19 pandemic has only served to exacerbate these\(^3\).

It is with this knowledge and understanding, both in the context of wider society and within the organisation itself, that GambleAware has developed its first equality, diversity and inclusion strategy.

For GambleAware to achieve its new vision, a whole system approach is needed. This should acknowledge the role that many other organisations, networks and individuals (including those with lived experience of gambling harm) play across the existing system. The charity must operate in a positive, equitable, diverse and inclusive way that caters for all.

This strategy should be viewed as a foundation for all colleagues, partners and stakeholders GambleAware works with, as it strives to deliver its new Organisational Strategy over the next five years. Only by embedding the principles identified in this strategy will GambleAware be able to successfully alleviate and lessen the inequalities experienced by some.

Whilst this document is principally the organisational strategy, outside of the scope of this policy is the Equality, Diversity and Inclusion built into the commissioning GambleAware undertakes. This is done principally through Commissioning Objective Two (increasing access to services to reduce gambling harm inequalities); this is exemplified through programs such as The Community Resilience Fund and ongoing inequalities framework.

Michelle Highman
Trustee, GambleAware

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\(^1\) Levy, O’Driscoll, Sweet, 2020, *Disproportionate Burdens of Gambling Harms Amongst Minority Communities A Review of the Literature* (GambleAware: London)

\(^2\) Dinos, Windle, Crowley, Khambhaita. 2020 *Needs and Gap Analysis in Great Britain: Synthesis of findings from a programme of studies* (NatCen: London)

\(^3\) Gunstone, Gosschalk, Joyner, Diaconu, Sheikh, 2020, *The impact of the COVID-19 lockdown on gambling behaviour, harms and demand for treatment and support* (YouGov: London)
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Introduction

GambleAware is committed to ensuring fair and equitable treatment, access and opportunity for all employees and partners. To achieve this, GambleAware has a dedicated Equality, Diversity and Inclusion (EDI) Group. The Group works to drive change by embedding key principles across the organisation, aiming to flag and eradicate racism, ableism, misogyny, sexism, homophobia, transphobia and all forms of discrimination and prejudice.

This EDI strategy outlines GambleAware’s aim to ensure all staff, commissioning partners and stakeholders are committed to attaining a more equitable society and promoting zero tolerance towards all forms of discrimination, inequality and exclusion. The work outlined in this strategy serves to complement and support GambleAware’s charitable objectives, as well as its Organisational Strategy. It is essential that EDI principles are woven throughout all GambleAware activity and steps to embed and improve EDI are evident and sustainable.

Background

GambleAware recognises that there are disproportionate burdens of gambling harm amongst minority communities in Great Britain. As stressed previously, we acknowledge this is “not because of anything inherent and immutable about these communities. Instead, […] a backdrop of inequality, oppression, injustice, and discrimination must not be ignored when engaging with gambling harms”.4 The recently published evidence review from Public Health England also found that socioeconomic and health inequalities persist among people classed as ‘at-risk’ and ‘problem gamblers’. 5

With these insights, it is important to acknowledge that gambling harms can happen alongside inequality, social exclusion, racism and discrimination, which can shape the overall experiences of minority and marginalised communities. GambleAware recognises that action is needed to challenge existing structural inequality, and help reduce gambling harms amongst these communities.

The EDI Group, which sits at the core of the organisation, has GambleAware staff as its members. All members meet the Group’s eligibility criteria, which is inclusive of lived and professional experience in reducing societal inequalities. These criteria enable the Group to capitalise on direct and relevant experiences of GambleAware employees, and offer insight into minority and marginalised communities. The Group incorporates a mix of views and opinions to deliver a more equitable organisation.

Our Vision

The Group emphasise that GambleAware will work to inform and ensure that staff, partners, stakeholders and those we commission are embedded within a culture of inclusion, diversity and equality.

The Group has set out a clear vision that:

All staff, commissioning partners and stakeholders are committed to driving change for a more equitable society.

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This will be achieved through:

Promoting zero tolerance towards inequality, exclusion, racism and all forms of discrimination throughout the organisation and through the work of our partners.

The steps highlighted in this EDI strategy align with GambleAware’s overall aim of a society safe from gambling harm, sitting alongside other existing and future projects to increase access to services and reduce inequalities.

Organisational Workstreams

The EDI Group has established three key workstreams to achieve the vision of the Group and promote its principles. These workstreams are:

- **Commissioning**: The work GambleAware commissions third parties to undertake, including healthcare and service provision, awareness raising (for example through advertising and media agencies), and education and research.
- **Corporate**: The infrastructure of the organisation, including management processes and practices, organisational policies and human resources.
- **Individual**: Interpersonal engagements and interactions within GambleAware, including fostering a ‘culture’ within the organisation.

By identifying these workstreams, the EDI Group can clearly set out activities to promote EDI across these different workstreams. This strategy also sets out the destination GambleAware strives to reach, as it becomes a more inclusive and diverse organisation.

### 1) Commissioning

GambleAware has a commitment to commission in a way that promotes equality and reduces inequality in access and outcomes. **All GambleAware commissioned projects need to have the core EDI principles woven throughout, to ensure all those who experience gambling harms are served equally.** This would include equality as per the protected characteristics as defined in the Equalities Act, as well as serving – where relevant – communities with disproportionate burdens of gambling harms, notably minority and marginalised communities. In order to assess commissioned partners’ commitment to our principles, we are committed to assessing commitment and focus on equality, diversity, and inclusion centring of our prospective partners. **A clear process that facilitates the delivery of inclusive and accessible work by all GambleAware commissioned partners is a step towards achieving this, notably** a series of actions including contractual requirements, engaging with affected communities and those with relevant lived experience or gambling harms, inequalities, and/or marginalisation.

To build an initial understanding and awareness of the existing inequalities, disparities and the impact of this on those experiencing gambling harm, GambleAware is embarking on an ambitious programme of research focussing on establishing how inequality, marginalisation, and discrimination all drive disproportionate burdens of gambling harms for some communities. To this end, GambleAware have commissioned an Inequalities Framework foundational study, to establish the need for and prototype of a framework detailing how structural societal inequalities intersect with gambling and gambling harms. Gamble Aware has also focussed on specific communities who we know experience disproportionately high burdens of harm and face barriers in accessing
services, and has invested £550,000 into research on the lived experience of minority communities and gambling, and women and gambling, and will be similarly commissioning research focussing on minority sexualities and gender identities. GambleAware also published a *scoping study*\(^6\) and *secondary analyses*\(^7\), with an ambition of using these insights to address gaps relating to EDI and better serve those experiencing gambling harms.

**Future Actions**

GambleAware must implement new governing principles and processes for its commissioning cycle which are in line with its EDI vision. These will support the charity in the delivery of its Organisational Strategy by enabling its commissioned partners to ensure the key EDI principles are woven into all commissioned programmes of work.

This will be achieved through:

- **Demonstrations of awareness and commitment to inclusion, diversity and equality:**
  All applications, proposal submissions and prospective partners should demonstrate their commitment to EDI in their work.
- **Case studies and examples:**
  Prospective partners should provide examples and case studies of how they incorporate EDI within their organisation.

GambleAware staff must also be empowered with knowledge and capability to recognise shortcomings in partners. This will equip staff with the insight needed to adopt an EDI lens when commissioning work and flag or escalate issues when necessary.

This will be achieved through:

- **Facilitating training sessions:**
  Staff will be encouraged to attend training sessions on how to identify and understand structural discrimination. The training will equip colleagues with the skills needed to incorporate diversity, accessibility and wellbeing into commissioned projects and programmes.
- **Developing new relationships with other commissioners in the public sector:**
  Teams will be encouraged to facilitate conversations with other commissioners in the public sector to understand how others tackle EDI, with a view to learn and shape best practice commissioning.

Alongside these structural developments, GambleAware will continue in commissioning and awarding grants to build understanding of minority and marginalised communities, inequality, and social exclusion. GambleAware will commit to using this research and understanding to challenge these structures of inequitability whilst promoting and disseminating these understandings through our communications and campaigns work.

**The Destination**

By implementing the above steps GambleAware should be in a position to:

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• **Actively encourage bidders to demonstrate their commitment** to the inclusion of all communities and equality, either through specific projects or as an organisation.
• **Feel empowered to challenge** a lack of inclusivity, accessibility, diversity and/or equality, as well as structural issues, such as discriminatory views or practices.
• **Have knowledge of the process in place to notify on** any activity that does not meet the key principles, at all levels of work, via liaison with the project team and at any stage of the commissioning process.
• **Engage** with commissioned partners, stakeholders and parallel commissioners to discuss and challenge practices around EDI and challenge discriminatory practices.
• **Facilitate open and diverse dialogues** that provide opportunities for regular, informal reflections of our own practices.
• **Showcase** the diversity of GambleAware’s partners and their inclusion of all communities.

2) **Corporate**

GambleAware’s prioritisation of equal opportunities and treatment of all staff needs to be reflected in best practice line management and organisation culture. Proactively incorporating EDI into the recruitment process and ensuring there is equitable treatment of staff (in terms of interpersonal interactions, pay, and opportunity), lays a foundation for the successful delivery of the Organisational Strategy.

**Future Actions**
GambleAware must build a strong corporate understanding of the roles and responsibilities needed to instil EDI principles within line management and organisational culture.

This will be achieved by:

• **Building the capacity of all line managers:**
  Managers will be given access to training to inform their capacity and capability to support staff through an EDI lens. This will ensure fair inclusion and access to opportunities, which will enable a good work experience, while fostering positive wellbeing, mental health and development.

• **Regularly evaluating and refreshing policies and practices:**
  Policies and practices will be frequently reviewed to ensure they continue to support EDI and will be promoted, signposted and easy to use. This will include gender pay and ethnicity pay gap reporting—necessary for the transparency of equality in treatment and opportunity.

• **Implementing inclusive policies that inform senior staff practices:**
  Senior advocacy for EDI principles is essential. Human resources and the EDI Group will work with senior leaders to embed EDI across the organisation. These policies should be used to help inform the practices led by senior staff and influence trustee commitment towards inclusivity.

**The Destination**

Through the application of the above changes, GambleAware’s people must:

• **Be clear about their responsibilities and duties** to promote equal opportunity, access and treatment for all communities, through the delivery of new policies which embed EDI into all management practices.
• **Deliver best practice line management** based on a culture that has EDI principles at its core to protect and celebrate staff and communities.

• **Be champions of inclusion activities and behaviours** which will be reflected within the senior leadership team, who will serve as role models and mentors for staff and will have the ability to critically reflect on individual behaviour and understand the importance of key EDI policies.

### 3) Individual

It is vital that individuals feel empowered, celebrated, and equipped to challenge inequality, discrimination and exclusion. Achieving this requires a culture that enables and encourages open communication and the ability to raise problematic structures and/or instances of discrimination.

**Future Actions**

GambleAware needs to enable an organisational culture which provides individuals with the mechanisms to flag problematic behaviour in a productive and sensitive way- without fear of conflict.

This will be achieved through:

• **Facilitating training sessions:**
  Specific training will be offered to staff to teach them how to flag and challenge problematic behaviour in an appropriate way and be receptive to constructive criticisms with regards to any activity or actions which are not representative of the core EDI principles.

• **Circulating and sharing key EDI principles with all colleagues:**
  The EDI strategy and work will be cited in GambleAware’s Staff Handbook, and the charity’s commitment to EDI will be reiterated during all inductions for new staff.

• **Promote a call out culture** to facilitate the identification and calling out of problematic interactions, alongside the EDI group members being there to support colleagues as guardians of the missions of the EDI group.

**The Destination**

By adopting the recommended changes, GambleAware should have a culture that is:

• **Critically reflective** and openly recognises growth and development areas and has a clear system in place to support this.

• **Open, inclusive, and egalitarian** and encourages clear communication, mutual education and empowerment through all roles, irrespective of function and seniority.

• **Able to facilitate and call out** problematic interactions, without retribution or retaliation.

• **Open to discussion about EDI** across the organisation, with line managers HR and the EDI group.

• **Open to positive and demonstrable change** that empowers individuals to take responsibility for their own conduct and critical self-improvement.

• **Able to celebrate, respect, and protect** the diversity of staff and the wider society in which GambleAware exists.

It is essential that we recognise the changing and evolving journey of the EDI Group- including monitoring staffing levels in order to be fully equipped to deliver on the above actions. This must be taken into account if GambleAware is to become an organisation that positions EDI principles at its core.
**Accountability and Measuring Success**

The work the EDI Group does must be evident, sustainable and be capable of measurement. It is essential that GambleAware regularly reports progress and change to ensure that all staff, commissioning partners and stakeholders remain committed to driving change for a more equitable society that is free from gambling harms.

To make sure GambleAware is delivering on the plans outlined in this strategy, the EDI Group will regularly monitor and report on progress. It will do this by:

- Providing quarterly updates on EDI to The Executive Leadership Team
- Providing annual updates on EDI to trustees
- Update the Board on progress at the quarterly board meetings
- Share monthly updates internally with all staff
- Produce an annual report to demonstrate progress

A practical workplan will also be produced and used by the Group to document the stages of progress over the next five years. The workplan will include clear deadlines, milestones and outputs for the Group and organisation to adhere to. Following a clear timeline and workplan will help ensure the aims and objectives set out in this strategy become a reality across GambleAware.
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Strategy published by GambleAware April 2022

If you would like an accessible version of this document in large text or an alternative format, please contact info@gambleaware.org.

About GambleAware:
GambleAware is an independent charity (Charity No. England & Wales 1093910, Scotland (SC049433) that champions and public health approach to preventing gambling harms.

GambleAware is a commissioner of integrated prevention, education and treatment services on a national scale, with over £56 million of funding under active management. As an independent charity, GambleAware is regulated by the Charity Commission for England and Wales, and the Scottish Charity Regulator (OSCR).

For further information, please contact info@gambleaware.org.