



# Equity, Diversity, and Inclusion Policy

## Introduction

We are an equal opportunity employer and recognise the benefits of a diverse workforce. Our aim is to ensure all employees and job applicants feel welcome and are treated equally at all stages of our recruitment process or during employment irrespective of their age, disability (visible and non-visible) gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex, sexual orientation.

We are committed to providing a working environment free from discrimination.

We aim to ensure everyone achieves their full potential and all employment decisions are taken without reference to irrelevant or discriminatory criteria. We promote the principles of equality and diversity in all our dealings with employees, workers, job applicants, clients, suppliers, contractors, recruitment agencies and the public.

All employees and those who act on the business' behalf are required to observe this policy when undertaking their duties or when representing the business. Everyone has a responsibility to ensure equality and inclusion within the workplace.

## The Equality Act 2010

Under The Equality Act 2010, it is unlawful to discriminate directly or indirectly in recruitment or during employment and outlines 'protected characteristics'. Protected characteristics are:

- age
- disability (visible and non-visible)
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (which includes colour, nationality and ethnic or national origins)
- religion or belief
- sex
- Sexual orientation

The following types of discrimination will not be tolerated:

**Direct discrimination:** when someone is treated less favourably because of a protected characteristic they have, or are thought to have, or because they associate with someone who has a protected characteristic.

**Associative discrimination:** where someone is discriminated against because they associate with someone who has a protected characteristic.

**Perceptive discrimination:** where someone is discriminated against because others believe they possess a particular protected characteristic.



**Indirect discrimination:** where a rule, policy or practice applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if it can be demonstrated it is a proportionate means of achieving a legitimate aim.

**Harassment:** where unwanted conduct related to a protected characteristic violates an individual's dignity or creates an intimidating, hostile, degrading or humiliating or offensive environment.

**Victimisation:** where an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act or are suspected of doing so.

### **Unlawful discrimination**

Unlawful discrimination of any kind in the working environment will not be tolerated and we will take all necessary action to prevent its occurrence.

Specifically, we aim to ensure no employee or job applicant is subject to unlawful discrimination, either directly or indirectly, because of a protected characteristic, political belief or affiliation or trade union membership. This commitment applies to all aspects of the employment, including:

- recruitment and selection, including adverts, job descriptions, interviews and the selection process
- training, promotion and career-development opportunities
- terms and conditions of employment, and access to employment-related benefits and facilities
- grievance handling and the application of disciplinary procedures
- selection for redundancy

Equal opportunities practice is developing constantly as social attitudes and legislation change. We will review all policies and implement necessary changes where these could improve equality of opportunity.

### **Responsibilities**

It is the responsibility of everyone and particularly our leaders and managers to create an environment where there is a recognition and appreciation of the benefits diversity brings to the Company.

The Company will:

- appoint, train, develop and promote based on merit and ability
- ensure that our policies and procedures comply with employment legislation
- ensure that employees are valued and respected and can achieve their full potential
- encourage all employees to call out and report any level of discrimination, victimisation, bullying or harassment to create a culture of support and tolerance
- address any instance of inappropriate behaviour and confront attitudes based on perception and inappropriate stereotypes
- consider requests for flexibility around working patterns and arrangements
- require members of our supply chain to share their policy and approach to diversity and inclusion on request



Managers will:

- be responsible for ensuring that employees reporting to them are aware of the policies on equity, diversity and inclusion at work. They should provide support and direction when needed
- be prepared to deal quickly and effectively with concerns and complaints or any violations of the policy
- be responsible for fostering a culture of equality and ensuring that our employees are encouraged and enabled to reach their full potential.

Employee's will:

- have personal responsibility for ensuring that their behaviour and actions do not amount to discrimination, harassment, bullying or victimisation in any way
- be responsible for recognising and respecting the needs and backgrounds of both colleagues, service users and clients/customers
- have a duty of care to all their colleagues to call out and challenge any behaviour which is deemed inappropriate
- be responsible for raising issues which they think might contravene the policy and any other supporting policies
- commit to attend and participate in Company training around equity, diversity and inclusion
- understand that breaches of the policy will be dealt with under the disciplinary procedure and could lead to dismissal in serious or repeated cases

## **Career development**

While positive measures may be taken to encourage under-represented groups to apply for employment opportunities, recruitment or promotion decisions will be based solely on merit, all employees will have equal access to training and other career-development opportunities appropriate to their experience and abilities. Please also refer to our Learning and Development Policy.

## **Complaints of discrimination**

We will treat seriously all complaints of discrimination made by employees, clients, suppliers, contractors or other third parties and will take action where appropriate.

If you believe you have been discriminated against, you are encouraged to raise the matter as soon as possible with your manager or other senior employee using our grievance procedure.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If you make an allegation of discrimination, we are committed to ensuring you are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under our disciplinary procedure.

## **Investigating accusations of unlawful discrimination**

If you are accused of unlawful discrimination, we will investigate the matter fully. During the investigation, you will be given the opportunity to respond to the allegation and provide an explanation of your actions. If the investigation concludes your actions amount to unlawful discrimination, you will be subject to disciplinary action, up to and including dismissal without notice for gross misconduct.



## **Monitoring and Reporting**

Diversity and Inclusion will be part of regular company agenda to review the policy and consider actions to address imbalances or underrepresentation.

Data will be collected on employees for each protected characteristic, enabling an informed view of the workforce to positively influence decisions to be made at all levels. This policy will be amended as appropriate to meet the demands of future legislation and reflect the needs of our employees and the sector in which the Company operates.