

## **EQUALITY, DIVERSITY, AND INCLUSION POLICY**

### **Policy statement**

The Company is committed to promoting equality, diversity and inclusion; building a supportive culture that actively values difference. We will recruit, develop and retain the most talented people, regardless of their background. We promote a culture of dignity and respect, treating all staff fairly, as individuals and actively challenging discrimination, should it ever occur.

We embrace diversity in our workforce and recognise the many benefits that diversity of experiences, cultures and perspectives bring. We recognise that equality, diversity and inclusion are not inter-changeable but inter-dependent. There can be no equality of opportunity if difference is not present, recognised and valued.

Our aim is to create a workforce that is truly representative of all sections of society and our customers, and for each member of staff to feel valued, respected and that they can be successful. To achieve this The Company will:

- Treat staff and other individual stakeholders with whom we work, with fairness, dignity, and respect.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, and where individual differences and the contributions of all staff are recognised and valued.
- Protect staff from discrimination on the basis of irrelevant characteristics:
  - Including age, disability, gender reassignment (gender identity), marriage and civil partnership, pregnancy and maternity, race (to include colour, nationality or ethnic or national origins), religion or belief, sex, sexual orientation, Trade Union membership or part time working, which are protected by law; and
  - Other irrelevant criteria such as social-economic background, language, accent, weight, caste, even where they may not attract legal protection.
- Ensure that the policies, strategies and behaviours that promote equality, diversity and inclusion within the workplace are in place; reviewing them regularly to take account of changes to our approach or the law.
- Review internal processes and outcomes to identify and eliminate barriers to inclusion whilst ensuring fairness and consistency.
- Recruit, promote and reward based on merit (apart from where there are necessary and limited exemptions and exceptions allowed under the Equality Act e.g., when casting for a specific role), irrespective of difference and background, in a fair and transparent way.
- Work to identify and remove unnecessary barriers for our staff seeking opportunities through training, development, and promotion.
- Value diversity and encourage our staff to celebrate their culture and be proud of their differences.
- Support flexible and agile working where possible.
- Make reasonable adjustments to our working arrangements, policies and practices that enable people with disabilities to take up employment with us.
- Support members of staff with different religious or cultural needs where practical, for example through the provision of appropriate spaces for prayer and adaptation of working patterns.
- Make opportunities for training, development and progress available to all staff, providing the support to allow them to reach their full potential.
- Provide access to diversity training to raise awareness and understanding of difference and the impact bias can have on unconscious behaviours and decisions.
- Empower our staff to raise concerns about issues they feel are important and to have confidence they will be dealt with professionally and appropriately.
- Take a zero-tolerance approach to bullying, harassment, victimisation and unlawful discrimination by fellow members of staff, customers, suppliers, visitors, the public and any other people our staff come into contact with, in the course of work activities. Such acts will be dealt with as misconduct under the Company's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

### **Scope**

This policy applies to the conduct of all staff in the workplace and also to conduct outside of the workplace that is related to your work (e.g. at meetings, social events and social interactions with colleagues) or which may impact the Company's reputation (e.g. the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to the Company).

## Eliminating discrimination - The Legal Framework

The Equality Act (2010) prohibits discrimination, harassment and victimisation on the basis of the following Protected Characteristics:

- Age
- Disability
- Gender reassignment (gender identity)
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

It defines different types of discrimination:

- *Direct Discrimination* occurs where a person is treated less favourably because they, or someone with whom they are associated, has one or more Protected Characteristics. e.g., refusing to promote a pregnant member of staff on the basis that she is due to go on maternity leave would be direct discrimination on the Protected Characteristic of the employee's sex. Other types of direct discrimination are:
  - Associative discrimination - this is direct discrimination against someone because they associate with another person who possesses a Protected Characteristic e.g., an employee is discriminated against because their child is disabled.
  - Perceptive discrimination - this is direct discrimination against an individual because others think they possess a particular Protected Characteristic, even when they do not e.g., where someone believes the individual is trans.
- *Indirect Discrimination* occurs where an individual's employment is subject to a provision, criterion or practice which puts them and other people with the same Protected Characteristic at a particular disadvantage when compared to others without that characteristic and that provision, criterion or practice cannot be objectively justified.
- *Victimisation* occurs where an individual is subjected to a detriment because they have either made or supported a complaint or grievance under the Equality Act (2010), or because they are suspected of doing so.
- *Harassment* occurs where there is unwanted conduct of a sexual nature or related to a Protected Characteristic that has the purpose or effect of violating the victim's dignity or of creating an intimidating, hostile, degrading humiliating or offensive environment. An individual can complain of this behaviour even if it is not directed at them and they don't need to possess the relevant characteristic(s) themselves. (Please see our Anti-Harassment and Bullying Policy for further details).

The Company recognises our legal duty to tackle discrimination and will not permit any act of discrimination, harassment or victimisation on the basis of any of the Protected Characteristics listed above. In addition to this, we will not discriminate on the basis of part time working or Trade Union membership, and we will regard any harassment or bullying on these or any other grounds as a serious matter.

## Positive action

Positive action aims to promote equality by improving outcomes for groups of people who are under-represented or disadvantaged. In these instances, it is possible to encourage specific groups to take advantage of employment opportunities, or to provide specific training and development interventions for them. The Company may at times, take positive action to address under-representation.

### **Disability discrimination and reasonable adjustments**

Under the Equality Act 2010, a person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities. If you have a disability or may have a disability, during your employment with us, we encourage you to tell us about your condition so we can support you and consider what reasonable adjustments can be made for you.

Staff will not be discriminated against directly or indirectly because of a disability or because of something arising out of that disability.

### **Diversity monitoring**

The Company may collect demographic information as part of its recruitment and promotion processes and within employment with the purpose of identifying barriers to inclusion and eliminating unlawful discrimination. Where barriers are identified and action is appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to participation.

Any information gathered will be collected and stored in line with the Data Protection Act (1998) and General Data Protection Regulation (2016) and will only be used for monitoring and reporting purposes.

### **Unconscious discrimination**

The Company recognises that discrimination does not necessarily occur as a result of a conscious decision and will work to identify and eliminate unconscious bias including, but not limited to, general assumptions, stereotypes, micro-inequities and the application of requirements, conditions or criteria without considering whether they advantage or disadvantage particular groups.

### **Responsibilities**

All staff have a responsibility to:

- Treat all staff, customers and visitors with dignity and respect at all times.
- Value the differences that exist between people.
- Not discriminate against, harass, or victimise members of staff, visitors or customers, or encourage others to do so.
- Challenge unacceptable behaviour displayed by members of staff, visitors or customers, reporting the issue as appropriate, even if it is not directed at them.
- Complete equality, diversity and inclusion training and development activities as requested, to encourage the promotion of equality, diversity and inclusion.

In addition, managers have a responsibility to implement this policy and to bring it to the attention of their teams.

They will:

- Lead by example, promoting an inclusive working environment where discrimination, harassment and victimisation will not be tolerated.
- Encourage diversity and awareness of diversity issues.
- Ensure that decisions made during recruitment or employment are free from discrimination.
- Act with fairness and consistency at all times.
- Create a culture where staff feel able to raise complaints or issues, without fear of reprisal.
- Treat any complaints of discrimination, harassment or victimisation seriously, dealing with them promptly and confidentially, in accordance with the relevant policy.

### **Dealing with Discrimination**

The Company will not tolerate any acts of unlawful or unfair discrimination (including harassment) committed against an employee, contractor, job applicant or visitor because of a Protected Characteristic.

If you believe that you may have suffered discrimination because of any of the above Protected Characteristics, where possible, you should raise your concern with your line manager or another member of staff in a relevant

position of seniority or Trade Union representative. Alternatively, you may decide to raise the matter through The Company's Anti-Harassment and Bullying Policy or the Grievance Policy.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the appropriate procedure. The Company will ensure that individuals who make such allegations in good faith will not be victimised or treated less favourably as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under the Discipline Policy.

We take a strict approach to breaches of this policy. If we suspect that you have committed an act (or acts) of discrimination or harassment or otherwise acted in breach of this policy, you will be subject to our Disciplinary Procedure or Anti-Harassment and Bullying Policy. This may result in disciplinary action being taken against you. In serious cases, this behaviour may constitute gross misconduct and, as such, may result in dismissal without notice (or payment in lieu of notice).

#### **Review**

This policy will be reviewed every three years (or earlier if required by legislative or business changes).

**This policy has been in operation since October 2021 and will be reviewed in October 2024.**