Equality, Diversity and Inclusion

What this policy covers

This policy applies to employees, workers and contractors.

The Company values and actively strives to have a diverse and inclusive workforce in a working environment free from discrimination. An inclusive work culture where people of different backgrounds are valued equally will ensure better outcomes for us all. We continually engage with our staff as well as external partners to help us to understand how we can make our workplace more inclusive and gain an insight into what our staff need most from us.

The Company will seek to promote the principles of equality, diversity and inclusion in all its dealings with employees, workers, job applicants, clients, customers, suppliers, contractors, recruitment agencies and the public.

Everyone who acts on the Company's behalf are required to adhere to this policy when undertaking their duties or when representing the Company in any other guise.

Your entitlements and responsibilities

Unlawful discrimination

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

Specifically, the Company aims to ensure that no employee, worker or job applicant is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, gender reassignment, race (including colour, nationality, caste and ethnic origin), disability, sexual orientation, marital status, part-time status, pregnancy or maternity, age, religion or belief, political belief or affiliation or trade union membership. This commitment applies to all aspects of employment, including:

- recruitment and selection, including advertisements, job descriptions, interview and selection procedures
- 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

Equality, diversity and inclusion practice is developing constantly as social attitudes and legislation change. The Company will review all policies and implement necessary changes where these could improve equality of opportunity.

Inclusion

- ensure that you are always presenting the best of yourself at work and in supporting your colleagues so that we encourage an engaged, welcoming and committed workplace which realises the potential of all involved;
- understand the policies surrounding Equality, Diversity and Inclusion in the capacity of your role and how they affect not only you but your fellow colleagues;
- be receptive and open to differences and where appropriate challenge your own thinking to ensure you do not fall foul of making assumptions about colleagues and/or customers who may be different to you;
- understand the full breadth of the negative impact discrimination of any kind can have on the Company, our customers and your colleagues;
- follow the appropriate channels to challenge behaviours that are not inclusive; and
- ensure that the Company's Equality, Diversity and Inclusion Policy is at the forefront of your mind when dealing with customers in order to respect their differences so that you represent the Company in the correct light.

Everyone within the Company must fully understand and comprehend how this policy will affect them and they must abide by the following when carrying out their duties. When working for or representing the Company you must:

Managers

In addition, managers must:

- establish inclusive values throughout your team to ensure differences are being valued and inappropriate behaviour is being challenged swiftly;
- take appropriate action where there is a clear breach of the Company's Equality, Diversity and Inclusion Policy in order to discourage such behaviour and supply relevant training to encourage correct behaviours;
- be a clear role model to the team you manage to demonstrate your own actions and behaviours are in line with those of the Company's inclusion commitment; and
- consider all steps to ensure inclusion is prevalent within every stage from induction to exiting, ensuring that all decisions taken are based completely on merit and that clear opportunities to develop skills and potential is available to all.

Recruitment of ex-offenders

The Company actively promotes equality of opportunity for all candidates, including those with criminal records where appropriate.

The Company requires you to provide details of any relevant criminal record at an early stage in the application process. Specific rules about which convictions and spent convictions you

should disclose and those you need not disclose - known as "protected convictions" - are contained in legislation.

Any such information should be sent in a separate confidential letter to the designated person. Only those who need to see it as a formal part of the recruitment process will have access to this information.

Having a criminal record will not necessarily prevent you from being appointed.

Any recruitment decision will depend on the nature of the position and the circumstances and background of the offence(s). The Company will discuss with you the relevance of any offence to the job in question.

If you fail to reveal any information relating to disclosures in accordance with the Company's Disclosures Policy, this may lead to the withdrawal of an offer of employment.

The Company's policy in relation to the handling of criminal records data is contained in the Disclosure and Disclosure Information Policy.

Career development

While positive measures may be taken to encourage under-represented groups to apply for employment opportunities, recruitment or promotion to all jobs will be based solely on merit.

Everyone will have equal access to training and other career-development opportunities appropriate to their experience and abilities.

However, the Company will take appropriate positive action measures (as permitted by equal opportunities legislation) to provide specialist training and support for groups that are underrepresented in the workforce and encourage them to take up training and career-development opportunities.

Procedure

Complaints of discrimination

Everyone is responsible for the promotion and advancement of this policy. Behaviour, action or words that breach the policy will not be tolerated and could be deemed an act of discrimination.

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

If you believe that you have been discriminated against, you are encouraged to raise the matter as soon as possibe with your manager or other senior manager using the Company's Grievance

Procedure (outlined elsewhere in the Employee Handbook). If the Grievance Procedure does not apply, you should raise a complaint to a senior manager.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If you make an allegation of discrimination, the Company is committed to ensuring that you are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under the Company's Disciplinary Procedures (or other such appropriate measures where the Disciplinary Procedure does not apply).

Investigating accusations of unlawful discrimination

If you are accused of unlawful discrimination, the Company will investigate the matter fully.

During the course of the investigation, you will be given the opportunity to respond to the allegation and provide an explanation of your actions.

If the investigation concludes that the claim is false or malicious, the complainant may be subject to disciplinary action.

If the investigation concludes that your actions amount to unlawful discrimination, you will be subject to disciplinary action, up to and including dismissal without notice for gross misconduct.

Monitoring

The Company may carry out monitoring for the purposes of measuring the effectiveness of its Equality, Diversity and Inclusion Policy.