



Equality, Diversity and Inclusion Policy



1. Policy Statement

- 1.1 The Company is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants equally.
- 1.2 The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company.
- 1.3 Employees have a duty to co-operate with the Company to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this equal opportunities and dignity at work statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination. Employees who commit serious acts of harassment may also be guilty of a criminal offence.
- 1.4 We seek to eliminate discrimination, harassment and victimisation and advance equality of opportunity, foster good relations, tackle prejudice and promote understanding. We aim to ensure fair treatment for everyone by recognising people's different needs, situations and goals and removing the barriers that limit what people can do and be. We are committed to promoting equality of opportunity, valuing diversity and tackling social exclusion. We want to make sure that equality and diversity is at the heart of everything we do. We achieve this through assessing the impact of our services on our staff and customers, by involving them in our decision-making and making sure our policies do not discriminate against any groups in our communities or our workforce. We strive to ensure that the company is truly inclusive.
- 1.5 You should draw the attention of your line manager to suspected discriminatory acts or practices or suspected cases of harassment. You must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's disciplinary procedure.

2. Understanding and Avoiding Discrimination

The company wants an environment in which all colleagues, job applicants, suppliers, contractors, customers and clients feel safe, comfortable, valued and respected. Everyone has a part to play in making this a reality and for the good of all, we will not tolerate any behaviour that constitutes discrimination, harassment or victimisation or that threatens or demeans others. This includes but is not limited to exclusion; intimidation; use of offensive words or actions; inappropriate or unwanted physical contact; inappropriate gossip, jokes or remarks whether written or spoken and bullying.

Types of Discrimination

- Direct discrimination - where a person is treated less favourably than others because of a protected characteristic.

- Indirect discrimination - where a rule or arrangement which cannot be justified is applied to everyone but puts those with a protected characteristic at an unfair disadvantage
- Discrimination by association - where a person is treated less favourably because they associate or are connected with someone who possesses a protected characteristic
- Harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them

An important related concept is "Victimisation" where a person is treated less favourably or is punished or threatened with punishment for having complained about discrimination or supported someone else who has complained about discrimination.

We treat all cases of discrimination, including for these purposes victimisation, seriously. If any member of staff acts in a discriminatory manner towards a colleague, job applicant, contractor, supplier, customer or client this will result in disciplinary action.

We encourage everyone to report any incident of actual or suspected discrimination to Andrea Gravell, Resource Director. All concerns will be taken seriously and investigated promptly.

3. Recruitment, Advertising and Selection

- 3.1 The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications. The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.
- 3.2 Advertisements will encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable:
 - Ensure advertisements are not confined to those publications which would exclude or disproportionately reduce the numbers of applicants of a particular age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
 - Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
 - Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees of any particular age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 3.3 The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.
- 3.4 With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to work premises in

order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

- 3.5 If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

4. Training and Promotion

- 4.1 The Company will train all line managers in the Company's policy on equal opportunities and in helping them identify discriminatory acts or practices or acts of harassment or bullying. Line managers will be responsible for ensure they actively promote equal opportunity within the departments for which they are responsible.
- 4.2 The Company will also provide training to all employees to help them understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment that is free of bullying and harassment.
- 4.3 Where a promotional system is in operation, it will not be discriminatory and it will be checked from time to time to assess how it is working in practice. When a group of workers age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation appears to be excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

5. Terms of Employment, Benefits, Facilities and Services

- 5.1 All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

6. Equal Pay

The Company is committed to equal pay in employment. It believes its male and female employees should receive equal pay for like work, work rated as equivalent or work of equal value. In order to achieve this, the Company will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

7. Bullying and Harassment

- 7.1 Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.
- 7.2 Harassment occurs where, on the ground of an employee's age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, a person engages in unwanted conduct that:
- has the purpose of violating the employee's dignity at work, or of creating an intimidating, hostile, degrading, humiliating or offensive work environment for the employee; or
 - is reasonably considered by the employee to have the effect of violating his or her dignity at work, or of creating an intimidating, hostile, degrading, humiliating or offensive work environment for the employee, even if this effect was not intended by the person responsible for the conduct.
- 7.3 Conduct may be harassment whether or not the person intended to offend. Something intended as a 'joke' or as 'office banter' may offend another person. This is because

different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.

- 7.4 Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.
- 7.5 Harassment also occurs where, on the ground of the employee's rejection of or submission to unwanted conduct of the kind specified above, a person treats the employee less favourably than he/she would treat him/her had he/she not rejected, or submitted to, the unwanted conduct.

Examples

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include, but are not limited to, the following:

- unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature.
- subjection to obscene or other sexually suggestive or racist comments or gestures.
- the offer of rewards for going along with sexual advances or threats for rejecting sexual advances.
- jokes or pictures of a sexual or racial nature.
- demeaning comments about an employee's appearance.
- questions about a person's sex life.
- the use of nick names related to an employee's sex, sexual orientation, gender reassignment, race, religion, age or disability.
- picking on or ridiculing an employee.
- Isolating an employee or excluding him or her from social activities or relevant work-related matters.

8. Reporting Complaints

- 8.1 All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints of discrimination or harassment from members of a particular age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 8.2 With cases of harassment, while the Company encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical.
- 8.3 If you wish to make a complaint of discrimination or harassment, you should follow the following steps:
- First of all, report the incident of discrimination or harassment to your line manager. If you do not wish to speak to your line manager, you can instead speak to the Resource Director.
 - Such reports should be made promptly so that investigation may proceed and any action taken expeditiously.

- All allegations of discrimination or harassment will be taken seriously. The allegation will be promptly investigated and, as part of the investigatory process, you will be interviewed and asked to provide a written witness statement setting out the details of your complaint. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation.
- Once the investigation has been completed you will be informed in writing of the outcome and the Company's conclusions.
- The Company is committed to taking appropriate action with respect to all complaints of discrimination or harassment which are upheld.
- You will not be penalised for raising a complaint, even if it is not upheld, unless your complaint was both untrue and made in bad faith.

8.4 Any employee who is found to have discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under the Company's disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, line managers who had knowledge that such discrimination or harassment had occurred under their management but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

9. Communication of this Policy

9.1 We are committed to the effective implementation of this policy. The Resource Director is responsible for communicating the policy and ensuring that it is brought to the attention of all staff and that all staff have continuing access to it. New joiners will receive a copy of this policy and relevant training as part of their induction.

10. Monitoring Equal Opportunities and Dignity at Work

10.1 The Company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required, the Company will implement them. The Company will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

Reviewed & Approved by Board of Directors - October, 2024

To be Reviewed by Board of Directors - October, 2026