

## Diversity and Inclusion Policy

### Introduction

The Company is committed to providing a working environment that is welcoming, inclusive, respectful and is free from discrimination.

### Scope

This policy and procedure applies to all UK employees, as well as potential employees (applicants), service users, secondees, casual and agency workers, contractors, volunteers, work experience and student placements (collectively referred to as 'staff' for the purposes of this policy).

The policy applies to all aspects of employment, including the advertisement of jobs, recruitment and appointment of employees, appraisals, promotion, conduct at work, training, conditions of work, pay, benefits, disciplinary and grievance procedures and termination of employment.

### Statement

We believe that all staff should expect to be treated with dignity and respect and that equality, diversity and inclusion are embedded into the organisation's communication, both internally and externally. The aim of this policy is to provide a framework that supports the below aims:

- To ensure that equality, diversity and inclusion are integral and fully reflected in our employment practices, policies and procedures.
- To ensure that we are compliant with the statutory employment duties under equality legislation (Equality Act 2010).
- To increase awareness and understanding of equality, diversity and inclusion across the organisation.
- To ensure that the Company attracts and retains a diverse workforce through appropriate means of recruitment and promotion methods.
- To ensure that no employee or applicant experiences less favourable treatment as a result of personal attributes or circumstances.
- To reinforce the view that any form of unlawful discrimination in employment practice is unacceptable.

This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

### Definitions

#### Protected Characteristics

Grounds upon which discrimination is unlawful. The characteristics are: age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, colour, ethnic or national origin, religion or belief, sex, sexual orientation.

#### Religion or Belief

Any religion, religious belief or similar philosophical belief.

#### Equality

Is about creating a fairer society where everyone has the opportunity to fulfil their potential.

#### Diversity

Is about recognising and valuing difference in its broadest sense. Inclusion is about an individual's experience within the workplace, wider society and the extent to which they feel valued and included.

## **Roles and responsibilities**

### Staff

All staff will:

- Treat people with dignity and respect
- Be aware of their responsibilities and, report inappropriate behaviour(s) and raise any incident(s) that breach this policy and procedure
- Familiarise themselves with this policy and procedure, ensuring that their practices are consistent with its contents and legislation.
- Champion equality, diversity and inclusion in the workplace.
- Provide personal diversity information when required on a confidential basis to help with equal-opportunities monitoring
- Be aware of their personal liability for discrimination under the Equality Act 2010.

### Line Managers

Line managers will:

- Be responsible for promoting and championing equality, diversity and inclusion
- Be responsible for creating a culture where the differences that individuals bring are valued
- Foster good relations between all employees.
- Ensure that their direct reports attend equality, diversity and inclusion training as part of mandatory training each year, in addition to Company induction.

The Company's Board of directors has overall responsibility for the operation of this policy and for ensuring and promoting compliance with current discrimination law. Day to day operational responsibility has been delegated to [POSITION]. Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting [POSITION]

Employees are reminded of the importance of the Company's Code of Conduct and expectations in terms of how they conduct themselves at work.

The Company and its Directors place great emphasis on maintaining procedures which are free from all forms of discrimination. Policies, procedures and practices will be regularly monitored in the light of this Policy and any necessary amendments made to ensure its aims are achieved.

## **Equal Opportunities**

All staff shall receive equal treatment regardless of any Protected Characteristics (defined above)

### Discrimination

Staff must not unlawfully discriminate against or harass others, including other staff, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts [or when wearing a work uniform]), and on work-related trips or events including social events.

Discrimination can be generally defined as less favourable treatment because of a Protected Characteristic (defined above) - this also covers less favourable treatment because of an association with someone with a Protected Characteristic or an incorrect belief that someone has a Protected Characteristic.

Discrimination can take many forms and it may occur intentionally or unintentionally:

- Direct discrimination:  
Occurs when someone is treated less favourably than others because of a Protected Characteristic that is protected by law. An example would be to refuse to appoint someone to a particular job simply because of his or her nationality.

- Indirect Discrimination:  
Occurs when applying a provision, criterion or practice which although applies to everyone adversely affects people with a particular Protected Characteristic more than others, and is not justified. An example of would be making a rule about uniform which would disadvantage those from a certain racial or ethnic group and for which there was no justification.
- Harassment and Bullying  
This includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. The Company has a separate Harassment and Bullying policy with a view to preventing harassment in the workplace and to ensure appropriate steps are taken to investigate and take any necessary action where an allegation of harassment is made.
- Victimisation:  
Occurs when an individual is treated less favourably because he/she has complained or given information discrimination or harassment, taken action to assert their legal rights under discrimination legislation or has assisted a colleague to do so.
- Disability discrimination:  
In addition to the usual forms of discrimination, this includes any unjustified less favourable treatment because of the effects of a disability (for example poor attendance), and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.
- Associative Discrimination:  
Where a person is treated less favourably because of their association with a person who has a Protected Characteristic. An example includes a individual being subjected to harassment on the basis that his/her partner is undergoing gender reassignment surgery.
- Perceptive Discrimination  
Where a person is treated less favourably because they are perceived as having a Protected Characteristic. An example is where a person has a Spanish accent and another person taunts them because of this. Even though the person may have in fact been born in England this may be race discrimination as the person has been harassed because of their nationality.

It is possible to discriminate against a person because of more than one Protected Characteristic. For example, discrimination can take place in relation to the same person because of their race, sex and religion.

### **Customers / Clients**

This policy applies equally to the treatment of the Company's customers/clients. In promoting equality of opportunity, the Company fulfils its social responsibilities towards its employees and communities in which it operates and also recognises its legal obligations under the relevant employment legislation.

### **Recruitment and selection**

All reasonable endeavours will be made to ensure that individuals are treated equally and fairly and that decisions on recruitment, selection, training, promotion and career development are based on merit against reasonable and objective criteria

The Company is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the Human Resources Department or UK Visas and Immigration.

**Equal Opportunities Monitoring:** To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in the Company, the Company monitors applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

### **Disabled staff**

In the event that a staff member is or becomes disabled during their employment/engagement and/ or unable to perform their role, they are encouraged to tell the Company about their condition so that the Company can support them as appropriate. If employees experience difficulties at work because of a disability, they may wish to contact their line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The line manager may wish to consult with the employee and/or their medical adviser about possible adjustments. The Company will consider the matter carefully and try to accommodate the employee's needs within reason. If the Company considers a particular adjustment would not be reasonable, the reasons will be explained attempts will be made to try to find an alternative solution where possible. Employees and line managers should contact HR for advice.

### **Part-time and Fixed-terms staff**

Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

### **Breaches of this policy**

Any employee who wishes to complain about discriminatory conduct should in the first instance contact HR who will discuss this informally and advise on the options available to them. Staff should feel able to raise such complaints and seek support. Staff are also encouraged to report the discriminatory behaviour of others even if it is not aimed at them (including visitors, clients and suppliers).

In the event that an employee wishes to formalise their complaint an employee may use the Grievance Procedure or Bullying and Harassment Procedure (if appropriate). For members of staff who are not employees, they should raise their concerns with their manager/main point of contact in the Company.

Complaints will be treated in confidence where possible and investigated as appropriate. No individual will be penalised or face disciplinary action for raising concerns in good faith. There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the Disciplinary Procedure.

The Company takes a strict approach to breaches of this policy, which will be dealt with in accordance with the Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

Staff should also be aware that they can be held personally liable for any act of unlawful discrimination or harassment.

### **Religion and Belief**

#### **Religious Observance**

Many religions or beliefs have special festival or spiritual observance days. An employee may request annual leave in order to celebrate festivals or attend ceremonies. Managers should sympathetically consider such a request where it is reasonable and practical for the employee to be away from work and they have sufficient annual leave to be taken from their entitlement. In dealing with such matters,



managers must seek to balance the operational needs of their service with the religious or belief needs of employees. Any request should also be considered in accordance with the Annual Leave Policy.

Some religions or beliefs have specific dietary requirements. If staff bring food into the workplace they may need to store and heat food separately from other food. This should be accommodated if reasonably practicable to do so.

Some religions require their followers to pray at specific times during the day. Staff may request access to an appropriate quiet place to undertake their religious observance. The Company is not required to provide time and facilities (e.g. a Prayer room), however, if a quiet place is available and allowing its use for prayer does not cause problems for other staff or interfere with the business, managers should consider allowing the request.

**Dress Code**

The Company operates a Dress Code and Appearance Policy which recognises cultural/religious considerations.