

# OUR POLICY ON EQUALITY, DIVERSITY AND INCLUSION

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## What's this policy about?

We encourage and promote the equality, diversity and inclusion of all our Staff and job applicants to ensure that everyone is treated with dignity and respect at all times. We want to create a working environment where everyone can make best use of their skills, free from unlawful discrimination or harassment, and where all decisions are based on merit.

Our aim in this policy is to set out our approach to equality, diversity and inclusion, and non-discrimination at work. We want you to know that you and any job applicants will receive equal treatment regardless of your age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation

(your '**Protected Characteristics**').

## Is this policy part of my contract of employment?

No, and we can change this policy at any time, but if any changes are made, we'll always make you aware of them. We may also vary things like time limits, if we feel we need to.

## Who's covered by this policy?

This policy applies to all employees, directors and other officers, workers and agency workers. We also require in any contracts with self-employed consultants or contractors that they comply with this policy, and we'll make sure they're given access to a copy. All these people are referred to as '**Staff**' in this policy.

We also refer to '**third parties**' in this policy, who are any customers, suppliers or visitors to our premises.

## What's covered by this policy?

This policy applies to all aspects of employment with us, including job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of employment, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

## Who's responsible for this policy?

Directors (by which we mean the most senior people within our organisation) will have overall responsibility for the effectiveness of this policy and to make sure it complies with discrimination law.

We also ask all managers to take responsibility for making sure this policy is followed and that its aims and objectives are promoted. We expect managers to lead by example and set an appropriate standard of behaviour for Staff, and we may provide managers with training on equality, diversity and inclusion awareness, including recruitment and selection best practice.

The successful operation of this policy also depends on you. Please take the time to read and understand it, and go back to your manager with any questions you may have. We have set out in the following section some more detail of what we expect of you.

## Your responsibilities under this policy

You cannot unjustifiably discriminate against or harass other people, including current and former Staff, job applicants or any third parties. This applies in the workplace, on work-related trips or events (including social events), and even outside the workplace (if you're working with third parties or other work-related contacts or wearing a work uniform).

Please also read our Anti-harassment and Bullying Policy in addition to this policy, to make sure you're aware of our approach for handling harassment.

## What is discrimination?

There are different forms of discrimination, which include:

- **Direct discrimination**, which means treating someone less favourably

because of their Protected Characteristics (such as rejecting a job applicant because of their religious views or making an offensive comment about a colleague because they were transgender).

- **Indirect discrimination**, which is where a requirement or practice applies to everyone, but adversely affects people with a Protected Characteristic more than others, without a good reason. An example is a requirement to work full-time, which puts women at a disadvantage because they generally have more childcare commitments than men – this could be a discriminatory requirement unless it can be justified.
- **Harassment**, which includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which (intentionally or unintentionally) violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them. Please read our Anti-harassment and Bullying Policy for more information about harassment.
- **Victimisation**, which means retaliating against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- **Disability discrimination**, which means unjustifiably treating someone less favourably because of a disability or failing to make reasonable adjustments to minimise disadvantages caused by a disability. This can be direct and indirect discrimination.

## How we can support you

### a) Raising a concern.

If you believe you may have been discriminated against, we encourage you to raise the matter through our Grievance Procedure. If you feel you may have been subject to harassment, we encourage you to raise the matter through our Anti-harassment and Bullying Policy. If you're uncertain which policy applies or have any questions, please speak to your manager.

### b) Disabilities and other health conditions.

If you have a disability or other health condition, please let us know so we can aim to provide you with support. We'll try to accommodate your needs as much as we can, however if we're unable to, we'll let you know why and try to find an alternative solution.

You can contact your manager to discuss reasonable adjustments to help minimise any difficulties you have at work. Your manager may want to speak with you and your medical adviser(s) about possible adjustments.

We'll also monitor the layout of our premises and, where necessary and reasonable, we'll make improvements to make sure anyone with a disability or other health condition isn't at a significant disadvantage when on our premises.

### c) Religion and cultures.

We'll take steps to accommodate requirements of different religions, cultures and domestic responsibilities.

## How do we monitor equality and diversity?

To help us know whether this policy is operating effectively, we may monitor some Protected Characteristics of our Staff and job applicants as part of our recruitment procedure to see if any groups are underrepresented or disadvantaged in our organisation. In addition to Protected Characteristics, we may also monitor working pattern preferences (such as part-time or flexible working) and caring responsibilities.

You can choose whether or not to provide this information to us – it won't affect your chances of recruitment or any other decision related to your employment.

We can also remove this information from your application before shortlisting if you ask us to. We'll keep it anonymised, and only use it to understand what steps we can take to avoid discrimination and improve equality and diversity in our organisation.

## Recruitment and selection process

We aim to ensure no job applicant suffers discrimination because of any Protected Characteristic. Our recruitment, promotion and other selections (such as redundancy) and procedures are regularly reviewed to make sure they are merit-based and use objective criteria, to avoid discrimination. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. When possible, shortlisting job applicants will be done by more than one person.

We avoid stereotyping or using language that may discourage people with a particular Protected Characteristic from applying, and try to advertise our job vacancies to a diverse section of the labour market, when we need to recruit externally. We may also use lawful exemptions to recruit someone with a particular Protected Characteristic (such as if the job can only be done by a woman) and will specify this in the advertisement.

We'll try to include a short policy statement on equality, diversity and inclusion in our advertisements, and we're happy to provide applicants with a copy of this policy if requested.

We won't ask applicants about their health or disability before a job offer is made, except:

- to establish that the applicant can perform a necessary part of the job (or if reasonable adjustments need to be made), which may also require a medical check,
- to confirm that an applicant can attend an assessment/interview (or if reasonable adjustments need to be made),
- where positive action is required to recruit an applicant with a disability, and
- for equality and diversity monitoring (which will not form part of the job selection or decision-making process).

Where necessary, job offers may be made conditional on a satisfactory medical check.

Applicants won't be asked about past, current or future pregnancies, nor will they be asked about matters concerning age, race, religion or belief, sexual orientation,

or gender reassignment.

Please be aware that we are required by law to ensure all employees are entitled to work in the UK. We won't make assumptions about your immigration status based on appearance or apparent nationality, therefore all prospective employees, regardless of nationality, must provide us with required documentation before employment starts to make sure we are complying with immigration laws.

## **Staff training, promotions and conditions of employment**

We'll provide Staff with training relevant to their jobs to make sure they are promoted based on merit. Training needs will be assessed through regular Staff reviews.

Our conditions of employment, benefits and facilities are also regularly reviewed to ensure they're available to Staff who should have access to them, and that there are no unlawful obstacles to accessing them.

## **Terminating your employment**

We'll make sure that redundancy criteria and procedures are fair, objective and do not directly or indirectly discriminate.

We'll also make sure that disciplinary procedures and penalties (such as disciplinary warnings, dismissal or other disciplinary action) do not discriminate against any groups.

## **Part-time and fixed-term work**

Part-time employees or workers and fixed-term employees will be treated the same as those who are full-time or permanent. Their terms and conditions will be no less favourable (on a proportionate basis, where appropriate), unless different treatment is justified.

## **Breaches of this policy**

If this policy may have been breached, we'll treat allegations confidentially and begin an investigation if necessary. You won't be victimised or treated less favourably for raising a complaint about discrimination. However, deliberately making a false allegation may be treated as misconduct and handled under our Disciplinary Procedure.

We take a strict approach to breaches of this policy, which will be handled under our Disciplinary procedure. Serious cases of deliberate discrimination may be considered gross misconduct, resulting in dismissal.

## **And that's it... for now**

We understand that things change, so we'll continue to review the effectiveness of this policy and make sure it's achieving its objectives.