

Equality, Diversity & Inclusion Policy

1. Purpose

Our organisation is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. And we value our people for the differences they bring to the table.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all.

To support this inclusive culture, this policy:

- outlines our commitment to equality, diversity and inclusion and sets out how we put this commitment into practice;
- explains the behaviours we expect of our people in support of this commitment; and
- sets out the key steps we take to make our culture as inclusive as possible.

Scope

This policy applies to anyone working for us. This includes Non Executive Directors, employees, workers, contractors, volunteers, interns and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

2. Our commitment to you

We believe that a culture of equality, diversity and inclusion not only benefits our organisation but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation.

We ensure that our recruitment, promotion and retention procedures do not treat people less favourably because of their:

- disability
- gender, gender identity or gender reassignment status
- marital status
- race, racial group, ethnic or national origin, or nationality
- religion or belief
- sexual orientation
- age
- civil partnership status
- pregnancy or maternity
- paternity
- educational background
- socio-economic background
- caring responsibilities
- part-time status
- fixed-term status

3. What we expect from you

One of our company values is Diversity – we recognise the importance of strengthening, improving and enriching our culture and practises through diverse opinions, skills and people.

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We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others. And the more areas of difference a person brings, the more this effect can be compounded.

We expect you to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff, consultants, job applicants and visitors) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues (including current and former staff), or third parties must be free from any form of discrimination, harassment, victimisation or bullying. 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. If any of our people are found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our disciplinary procedure.

You should be aware that you can be personally liable for discrimination and harassment.

4. Definitions

Discrimination

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;
- religion or belief;
- sexual orientation;
- age; and
- pregnancy or maternity.

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Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception. There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments"

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage.

Examples include:

- steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals;
- recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients; and
- using different standards for different groups of employees to judge performance.

Types of discrimination under the Equality Act 2010

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic. (For example choosing not to recruit someone because they are disabled and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a provision, criterion or practice that applies to everyone but puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
- **Harassment:** this includes sexual harassment and other unwanted conduct related to a particular 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.
- **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.
- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include: dismissing or failing to pay a bonus to someone because of their disability-related absence.
- **Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include: allocating some of the disabled person's duties to a colleague; changing their working hours or place of work; adjusting procedures for assessing job candidates; and modifying disciplinary and grievance procedures.

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You should refer to our anti-harassment and anti-bullying policy for further information on our procedure for reporting harassment.

Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful. You should refer to our Anti-harassment and Anti-bullying policy for further information on our procedure for reporting harassment.

5. Equality of opportunity

Recruitment

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible.

Anyone making a decision about recruitment must not discriminate in any way. Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.

We are required by law to ensure that all employees have the entitlement to legally work in the jurisdiction they are in. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective staff, regardless of nationality, must be able to produce original documents (such as a passport or birth certificate) before employment starts, to satisfy current immigration legislation. For the list of acceptable documents please contact the talent acquisition team.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor 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.

Disability Inclusion

Recruiting People with a disability

The talent acquisition team will consider disability in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. They should include a short policy statement on

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equal opportunities and our commitment to diversity, equity and inclusion in the workplace. A copy of this policy will be made available on request.

We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process for example, ensuring easy access to the premises for an interview.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a protected characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the People team. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the selection or decision-making process).

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

Talking about disability

We understand that some people find it hard to discuss their disabilities and that disability can be invisible.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion. However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

We do not tolerate ableist language in our organisation. Ableist language is language that is negative, inappropriate or offensive towards people with a disability and may take the form of jokes or "banter". If you adopt such language, we will take action against you including (for those to whom it applies) under our Disciplinary procedure.

Reasonable adjustments

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please contact your line manager or the People team to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you to help us get the right support in place.

Part-time and fixed-term work

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.

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Termination of employment

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory. We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Training

All new starters must attend equality, diversity and inclusion training as part of their onboarding programme. New starters will be required to confirm that they have read, understand and will comply with this policy and the Anti-harassment and Bullying Policy. Every current employee must attend regular equality, diversity and inclusion training on at least an annual basis.

Monitoring and review

We analyse diversity and inclusion data (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our equality, diversity and inclusion strategy

Breaches of this policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our disciplinary procedure. Serious cases of deliberate discrimination and victimisation may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered harassment, bullying or discrimination, or witnessed it happening to someone else in the workplace, you can raise the matter through our grievance procedure or through our anti-harassment and bullying policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against staff who complain about or report discrimination. If you believe you have been victimised for making a complaint or report of discrimination, or have witnessed it happening to someone else in the workplace, you should raise this through our grievance procedure.

We encourage the reporting of all types of potential discrimination, as this assists us in ensuring that diversity, equity and inclusion principles are adhered to in the workplace. However, making a false allegation in bad faith, or that you know to be untrue, will be treated as misconduct and dealt with under our disciplinary procedure.

This policy may be changed at any time, in accordance with the practices and needs of the Company. It will also be reviewed on a regular basis and updated in accordance with changes to relevant legislation.