**Equality and Diversity Policy**

We are committed to eliminating discrimination and promoting equal opportunities amongst our workforce and for job applicants. Our objective is to create a working environment in which there is no unlawful discrimination, and all decisions are based on merit.

This policy has been agreed with senior management and has the full support of our board of directors.

**Status of this policy**

This policy is non-contractual. The company reserves the right to alter any of its terms at any time and we will notify you in writing of any changes.

**Who this policy applies to**

This policy applies to all employees, workers, agency workers, contractors, volunteers, interns and job applicants.

**Responsibility for this policy**

The Group Managing Director has overall responsibility for this policy but has delegated responsibility for managing its implementation to the Group HR Manager.

Day-to-day responsibility for the operation of the policy sits with the line managers. If you have any questions about this policy, you should direct them to HR or your line manager in the first instance.

All managers are expected to lead by example, conducting themselves in accordance with this policy and ensuring that those they manage do the same.

**Discrimination**

Discrimination is unlawful when it takes place on one of the following grounds (the ‘protected characteristics’):

* age
* disability
* gender reassignment
* marriage and civil partnership
* pregnancy and maternity
* race (which includes colour, nationality and ethnic or national origin)
* religion or belief
* sex
* sexual orientation

Discrimination can take a number of forms:

* Direct discrimination is when someone is treated worse than someone else (or worse than someone else would be treated) because of a protected characteristic. For example, it would be direct discrimination if a manager excluded an employee from a training course because they are gay.
* It is also direct discrimination when someone is treated worse than someone else (or worse than someone else would be treated) because they associate with someone with a protected characteristic or because they are perceived to have a protected characteristic. For example, it would be direct discrimination if an employee ostracised a colleague because the colleague has a gay flatmate or because they think the colleague is gay.
* Indirect discrimination is when an apparently neutral practice or requirement disproportionately disadvantages people with a particular protected characteristic and cannot be justified by the needs of the business (as a proportionate means of achieving a legitimate aim). For example, imposing a requirement that job applicants must speak fluent English disproportionately disadvantages groups who are not native English speakers and would be unlawful unless it could be justified on genuine business grounds.
* It is also discrimination when a disabled person is treated unfavourably because of something connected to their disability and this cannot be justified by the needs of the business (as a proportionate means of achieving a legitimate aim), or when the business fails to make reasonable adjustments for a disabled person to alleviate the disadvantage(s) caused by the disability.
* Harassment is another form of discrimination. 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.
* Victimisation, i.e. retaliating against someone who has complained about discrimination or harassment, or who has supported someone else’s complaint about discrimination or harassment, is also unlawful discrimination.

It is also unlawful discrimination to:

* treat a part-time worker worse than a comparable full-time colleague, unless that treatment can be justified by the needs of the business (as a proportionate means of achieving a legitimate aim); and
* treat a fixed-term employee worse than a comparable permanent colleague, unless that treatment can be justified by the needs of the business (as a proportionate means of achieving a legitimate aim).

Part-time workers and fixed-term employees should also enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

This policy applies to prohibit all forms of unlawful discrimination in the workplace (which for home and hybrid workers includes their home), 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.

**Our responsibilities and approach**

We aim to avoid discrimination in all aspects of employment and recruitment. Our approach to different aspects of employment and recruitment is set out below.

**Recruitment and selection**

We aim to ensure that job requirements and job selection criteria are clear and based only on what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job.

We aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage particular groups and which are not justified by the demands of the job.

For all jobs, we will draw up a clear and accurate job description and person specification to ensure that we remain focussed on what the job involves and the skills, experience and qualifications which are relevant and necessary to do the job. If a job can be done flexibly, we aim to say so in the job description. We will advertise all vacancies to a diverse section of the labour market and we will ensure that job advertisements avoid stereotyping or using language that may discourage particular groups from applying. If we hold interviews, we will try to ensure that more than one person conducts them to ensure that we avoid unintentional bias.

We will not ask for personal or irrelevant information on application forms or in interviews. We will focus instead on whether someone has the relevant skills, qualities and experience to do the job.

We are required by law to ensure that all employees are entitled to work in the UK. We will not make assumptions about immigration status based on appearance, name, accent, or other attributes that might suggest a particular nationality. We will carry out a right to work check on all prospective employees, regardless of nationality, before they commence employment.

**Promotion, training and appraisals**

Promotion and training decisions will be made on the basis of merit. We will not unlawfully discriminate against any employee in making promotion or training decisions. We believe all employees should have an equal opportunity to progress and develop.

Where there is clearly more than one individual in our group of companies with the skills and/or ability to undertake an opportunity (promotion/transfer/deputising/secondment) we will advertise that opportunity to all so that everyone has an equal opportunity to apply. We will try to ensure that training and development opportunities are made known to all relevant employees.

Training needs will be identified through regular reviews/training needs analysis/appraisal discussions.

We have a formal appraisal system which helps us to ensure that employees are being assessed fairly on the basis of job performance and are not being discriminated against. We will conduct appraisals objectively and measure performance in a transparent and objective way, without prejudice or bias.

**Working conditions and terms of employment**

We will try to accommodate cultural or religious practices such as prayer requirements where we reasonably can.

We operate a company dress code as set out in our Dress Code Policy. We encourage you to follow our dress code in a way that:

* you feel matches your gender identity; and
* respects the requirements of your religion to the extent possible while complying with any health and safety requirements.

We aim to ensure that our terms of employment, benefits, facilities and policies are free from unlawful discrimination.

Where we provide separate facilities for men and women, we encourage you to use the facilities which you consider best match your gender identity.

We will ensure that decisions made under our Disciplinary, and Grievance, Policies are carried out fairly and without discrimination.

We will discuss the possibility of enabling flexible working arrangements on every job opportunity that arises. This includes flexibility of hours and working location. Whilst we recognise that some roles will not be suitable for flexible working arrangements we will review the reasons why to see if reasonable adjustments could be made to change this.

We will continue to carry out a regular audit/review of our pay structures to ensure that they are fair and free from discrimination. We aim to ensure that our pay systems are transparent, fair and free from discrimination.

**Termination of employment**

We will ensure that we avoid discrimination in making decisions about dismissal or redundancy.

Where possible, we will ensure that any manager’s decision to dismiss an employee is endorsed by another manager and the HR department. We will encourage leavers to give feedback about their employment in exit interviews.

**Disabilities**

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, we will make adjustments to accommodate you where possible and reasonable. With your input, we may wish to seek advice about possible adjustments from your doctor(s) and/or Occupational Health. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

**Your rights and responsibilities**

You have the right not to experience unlawful discrimination at work. You also have a responsibility to understand this policy and help us to implement it.

You have a duty not to discriminate against anyone at work and not to help anyone else do so. As part of this commitment, we expect you to respect a person’s gender identity, name and pronouns.

**Our relationships with customers/suppliers**

You must not discriminate against any of our customers/suppliers. Equally, we expect our customers/suppliers not to discriminate against you and we will take appropriate action against any customer/supplier found to have done so.

**What to do if you have been discriminated against**

If you believe you may have been discriminated against, please tell us. You can speak informally with your manager or anyone in HR. If you want to make a more formal complaint, you are encouraged to raise the matter through our Grievance Procedure.

Allegations of potential breaches of this policy will be treated seriously. Individuals who make such allegations in good faith will not be victimised or treated less favourably as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under our Disciplinary Policy.

**What will happen if you act in a discriminatory way?**

Breaches of this policy will be dealt with in accordance with our Disciplinary Policy and you may be subject to disciplinary action up to and including dismissal.

**Workplace Banter**

Many people view office or workplace banter as a bit of fun which is good for morale, and we encourage our colleagues to enjoy themselves at work. However, banter may cross the line and become unacceptable harassment and staff need to be aware of the potential impact of this. We require all staff to be aware of what can and can’t be said to each other. For example - If you cannot happily make the same remark to everyone then should you be making that remark at all?

Equality and diversity awareness training helps to reduce the risk of potentially offensive remarks being made in the first place and to help ensure that ‘workplace banter’ does not cross an acceptable line. The Company requires all staff to complete on-line Equality, Diversity & Inclusion training.

**Policy review and promotion**

We will promote and publicise our Equality Policy as widely as possible our intranet, induction packs, notice boards, and handbook.

We will review our Equality Policy on a regular basis.

**EQUALITY AND DIVERSITY DECLARATION:**

I have read and understood the Equality and Diversity Policy and agree to work to the expected standards. Regardless of my background and circumstances, I agree to treat all colleagues, customers and visitors with respect and dignity while carrying out the duties and responsibilities of my role.

Signature………………………………………

Date……………………………………………

Print name……….……………………………