

## EQUALITY, DIVERSITY AND INCLUSION POLICY

### *Policy statement*

The Company is an equal opportunity employer and is fully committed to a policy of encouraging equality, diversity and inclusion among its employees and job applicants and treating all of its employees and job applicants equally, fairly and without bias. The Company will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training and development, pay and benefits, other terms of employment, dealing with grievances and discipline, performance management, requests for flexible working, selection for redundancy and dismissal.

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 (including colour, nationality, ethnic or national origins and caste), religion or belief, sex or sexual orientation. In this policy, these are known as the “protected characteristics”. The Company’s aim is for its workforce to be truly representative of all sections of society, and for each employee to feel respected.

Employees have a duty to co-operate with the Company to make sure that this policy is effective in ensuring equality, diversity and inclusion and in preventing discrimination. Putting this policy into practice is the responsibility of every employee. 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 against a job applicant or employee or against a third party who does business with the Company, such as a client, customer, contractor or supplier. Serious breaches of this policy statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should bear in mind that they can be held personally liable for any act of unlawful discrimination in the course of their employment. This covers discrimination both in the workplace and in any work-related setting outside the workplace, for example during business trips, at external training events or at work-related social events and functions. It also covers discrimination in work-related online settings and electronic communications.

You should draw the attention of your line manager to suspected discriminatory acts or practices. You must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or who has provided information about such discrimination. Such behaviour will be treated as potential gross misconduct in accordance with the Company’s disciplinary procedure. You should support colleagues who suffer such treatment and are making a complaint.

The Company is also committed to providing a work environment that is free of harassment, bullying and intimidation and promoting dignity and respect for all. The Company has a separate dignity at work policy which deals with harassment, bullying and intimidation and sets out how complaints of that type will be dealt with.

Although this policy refers throughout to employees, it also covers, as appropriate, all other members of staff, including workers, agency workers, apprentices, volunteers, contractors and consultants employed or engaged by the Company.



## ***Direct discrimination***

Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or an employee is treated less favourably than other job applicants or employees are treated or would be treated.

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated and not on the job applicant's or employee's own protected characteristic. In addition, it can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not.

Discrimination after employment is also unlawful if it arises out of and is closely connected to the employment relationship, for example refusing to give a reference or providing an unfavourable reference for a reason related to one of the protected characteristics.

Discrimination is a barrier to equality, diversity and inclusion. It doesn't necessarily occur because of a conscious decision, as there are also subtle and unconscious ways of discriminating, such as making general assumptions about an employee based on stereotypes.

The Company will take all reasonable steps to eliminate direct discrimination in all aspects of employment.

## ***Indirect discrimination***

Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees but which is discriminatory in its effect on, for example, one particular sex or racial group.

Indirect discrimination occurs when there is applied to the job applicant or employee a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic of the job applicant's or employee's. A PCP is discriminatory in relation to a protected characteristic of the job applicant's or employee's if:

- it is applied, or would be applied, to persons with whom the job applicant or employee does not share the protected characteristic
- the PCP puts, or would put, persons with whom the job applicant or employee shares the protected characteristic at a particular disadvantage when compared with persons with whom the job applicant or employee does not share it
- it puts, or would put, the job applicant or employee at that disadvantage, and
- it cannot be shown by the Company to be a proportionate means of achieving a legitimate aim.

The Company will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

## ***Victimisation***

Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity or a promotion, because they have raised or supported a grievance or complaint of unlawful discrimination, or because they have issued employment tribunal proceedings for unlawful discrimination or they have given evidence in connection with unlawful discrimination proceedings brought by another employee. However, an employee is not protected if they give false evidence or information, or make a false allegation, and they do so in bad faith.

Post-employment victimisation is also unlawful, for example refusing to give a reference or providing an unfavourable reference because the former employee has done one of the protected acts set out above.

The Company will take all reasonable steps to eliminate victimisation in all aspects of employment.

### ***Recruitment, advertising and selection***

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, i.e. based on merit. The Company is committed to applying its equality, diversity and inclusion policy statement at all stages of recruitment and selection.

Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community and to encourage diversity and strive for greater inclusion, the Company will, as far as reasonably practicable:

1. Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.
2. Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.
3. Avoid stereotyping or using wording that may discourage particular groups from applying.

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 with a particular protected characteristic.

However, where, having regard to the nature and context of the work, having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, the Company will apply that requirement to the job role and this may therefore be specified in the advertisement.

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 shortlisting, 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, shortlisting will be done by more than one person, 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. Applicants will not be asked questions which might suggest an intention to discriminate on grounds of a protected characteristic. 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.

With disabled job applicants and employees, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled. If you are disabled, you are encouraged to tell the Company about your condition so that it can support you as appropriate.

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 any of the protected characteristics.

## *Access to Work*

The Company encourages all disabled job applicants and employees, and those with physical or mental health conditions, to apply to the government's Access to Work scheme for a grant. An Access to Work grant can pay for practical support to help you either start work or stay in work. How much you may be awarded depends on your circumstances.

To qualify for an Access to Work grant in relation to employment you must:

- have a disability or long-term physical or mental health condition that makes it hard for you to do parts of your job or to get to and from work
- be aged 16 or over
- live and work in England, Scotland or Wales; and
- have a paid job or be about to start or return to one - this also includes an apprenticeship.

If you are awarded a grant, the money can pay for things like special equipment, adaptations to the equipment you use, taxi fares to work if you can't use public transport and a support worker or job coach to help you in the workplace.

You can apply for an Access to Work grant either online (<https://www.gov.uk/access-to-work/apply>) or by phoning the Access to Work helpline on 0800 121 7479. Once you have applied, an Access to Work advisor will then contact the Company with your agreement and may also wish to visit you at work to assess your needs.

Access to Work is a government scheme and eligibility is strictly governed by the terms set by the government from time to time. It is also entirely the government's decision as to whether to award you a grant. The Company has no responsibility or liability for decisions made by the government.

## *Training and promotion*

The Company will train all line managers in the Company's policy on equality, diversity and inclusion and in helping them identify and deal effectively with discriminatory acts or practices. Line managers will be responsible for ensuring they actively promote equality of opportunity, diversity and inclusion within the departments for which they are responsible. Line managers must also set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this policy. In addition, all line managers who are involved in staff salary (and bonus) reviews will be trained on equal pay issues.

The Company will also provide training to all employees to help them understand their rights and responsibilities in relation to equality, diversity and inclusion and what they can do to create a work environment that is free from discrimination.

Opportunities for training and development will be made available to all employees, who will be helped and encouraged to develop to their full potential, so that their talents can be fully utilised and they can progress within the Company. Training needs will be identified through regular staff appraisals.

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. All promotion decisions will be made on the basis of merit.

When a group of workers who predominantly have a particular protected characteristic appear to be excluded from access to promotion, transfer and training and to other benefits, the system will be reviewed

to ensure there is no unlawful discrimination.

### ***Terms of employment, benefits, facilities and services***

All terms of employment, benefits, facilities, services and employment practices and procedures will be reviewed from time to time, in order to ensure fairness and that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

If you experience difficulties at work because of a disability, you may wish to contact your line manager to discuss any reasonable adjustments that would help you overcome or minimise the difficulty.

### ***Equal pay and equality of terms***

The Company is committed to equal pay and equality of terms in employment. It believes its male and female employees should receive equal pay where they are carrying out the same or broadly similar work, work that has been rated as equivalent under a job evaluation study or work that is of equal value. Equal pay for these purposes covers all forms of contractual pay, including salary, non-discretionary bonuses, commission, overtime rates and allowances and pension scheme contributions. It also covers any contractual benefits, such as life assurance cover, private medical insurance cover and company cars.

In order to achieve equal pay, the Company will endeavour to maintain a pay system that is fair and transparent, free from gender bias and based on objective criteria. The Company may also conduct pay and benefits audits from time to time (including a check of any pay grading structure that may be in operation), consider the findings and take any necessary action to address any pay discrimination or bias.

[Where it is legally obliged to do so, the Company will also prepare and publish an annual gender pay gap report in accordance with statutory requirements from time to time in force.]

### ***Reporting complaints***

All complaints about unlawful discrimination, inequality of opportunity, lack of diversity or inclusion or unequal pay will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints relating to unlawful discrimination, inequality of opportunity, lack of diversity or inclusion or unequal pay raised by employees.

If you wish to make a complaint about unlawful discrimination, inequality of opportunity or lack of diversity or inclusion, you should do so promptly, raising the matter in accordance with the process set out in the Company's grievance procedure. Complaints will be treated in confidence and investigated as appropriate.

If you wish to make a complaint that you are not being paid equally to another employee of the opposite sex for the same or broadly similar work, for work rated as equivalent following a job evaluation study or for work of equal value, you should again promptly raise the matter under the terms of the Company's grievance procedure.

If your complaint relates to bullying, harassment or intimidation, you should refer to the Company's dignity at work policy.

Employees who, in good faith, bring a grievance under this policy in relation to a discrimination, equal opportunities, diversity, inclusion or equal pay matter will not be disciplined, dismissed or otherwise suffer any adverse treatment for having done so. However, making a false allegation deliberately and in bad faith will be treated as misconduct under the Company's disciplinary procedure.

## *Monitoring equality, diversity and inclusion*

The Company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equality, diversity and inclusion are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required to address any issues, the Company will implement them. The Company will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

In addition, the Company will monitor the equality profile of its workforce to ensure that it is meeting its commitment in this policy of encouraging equality, diversity and inclusion.



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**David Jenkins**  
**MANAGING DIRECTOR**

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