

Equality, Diversity and Inclusion Policy

It is our policy not to discriminate against our workers based on their gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, pregnancy or trade union membership or the fact that they are a part-time worker or a fixed-term employee.

Our workers and applicants for employment shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes. We shall always strive to work within legislative requirements as well as promoting best practice.

Our EDI commitment includes the following principles:

1. Equality

We believe that everyone should be treated fairly and equally, and we strive to eliminate all forms of discrimination and bias in our workplace. We are committed to providing equal opportunities for all employees, including in recruitment, training, and career development.

1.2 Diversity

We believe that diversity is a strength that should be celebrated and embraced. We seek to create an inclusive environment that values and welcomes different perspectives, backgrounds, and experiences. We are committed to building a diverse workforce that reflects the communities we serve.

1.3 Inclusion

We believe that inclusion is essential for creating a sense of belonging and fostering a positive work environment. We are committed to creating a workplace where everyone feels valued, respected, and supported. We strive to ensure that all employees have access to the resources and support they need to succeed.

2. To whom does this policy apply?

- **2.1.** This policy applies to our employees, whether permanent, temporary, casual, part-time or on fixed term contracts, to ex-employees, to job applicants and to individuals such as agency staff, consultants, and volunteers who are not our employees, but who work with us.
- **2.2.** All workers have a duty to act in accordance with this policy, and therefore to always treat colleagues with dignity, and not to discriminate against or harass other members of staff, whether junior or senior to them. In some situations, we may be at risk of being held responsible for the acts of individual members of staff and will not therefore tolerate any discriminatory practices or behaviour.
- **2.3.** The policy statement in paragraph 1.2 applies equally to the treatment of our visitors, clients, customers and suppliers by our workers.

3. Personnel responsible for implementation of policy

3.1. The Managing Director Responsible for Health and Safety Gareth Pyne has overall responsibility for the effective operation of our Equal Opportunities Policy

(EOP) and for ensuring compliance with the relevant statutory framework prohibiting discrimination.

- **3.2.** Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote the aims and objectives of the company regarding equal opportunities.
- **3.3.** All members of staff are responsible for the success of this policy and must ensure that they familiarise themselves with the policy and act in accordance with its aims and objectives.

4. Scope and purpose of policy

- **4.1.** We will not unlawfully discriminate on grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, pregnancy, trade union membership, or part-time or fixed-term status.
- **4.2.** This policy applies to the advertising of jobs and recruitment and selection, to training and development, opportunities for promotion, to conditions of service, benefits and facilities and pay; to health and safety and to conduct at work, to grievance and disciplinary procedures and to termination of employment, including redundancy.
- **4.3.** We will take appropriate steps to accommodate the requirements of workers' religions, cultures, and domestic responsibilities.

5. Forms of discrimination

5.1. Discrimination may be direct or indirect and it may occur intentionally or unintentionally. Direct discrimination occurs where someone is put at a disadvantage for a reason related to one or more of the grounds set out in paragraph 3.1. For example, rejecting an applicant of one race because it is considered they would not "fit in" on the grounds of their race could be direct discrimination. Indirect discrimination occurs where an individual is subject to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of, for example, their sex or race.

6. Recruitment and selection

6.1. We aim to ensure that no job applicant receives less favourable treatment on any of the unlawful grounds listed in paragraph 3.1. Recruitment procedures will be reviewed regularly to ensure that individuals are treated based on their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Job selection criteria are regularly reviewed to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

6.2. We shall take steps to ensure that knowledge of vacancies reaches a wide labour market and, where relevant, groups under-represented in our business. Where appropriate, use may be made of lawful exemptions to recruit suitably qualified people to cater for the special needs of particular groups. Vacancy advertisements shall include an appropriate short statement on our equal opportunities policy and a copy of this policy shall be sent to those who enquire about vacancies.

7. Staff training and promotion and conditions of service

- **7.1.** Staff training needs will be identified through regular staff appraisals. All workers will be given appropriate access to training to enable them to progress within the organisation. All promotion decisions will be made based on merit.
- **7.2.** The composition and movement of workers at various levels will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.
- **7.3.** Our conditions of serve, benefits and facilities will be reviewed regularly to ensure that they are available to all workers who should have access to them and that there are no unlawful obstacles to accessing them.

8. Termination of employment

- **8.1.** We will monitor redundancy criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against employees.
- **8.2.** We will also ensure that disciplinary procedures are carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal, or other disciplinary action.

9. Breaches of the policy

- 9.1. If you believe that you may have been disadvantaged on any of the unlawful grounds listed in paragraph 3.1, you are encouraged to raise the matter through our grievance procedure. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Workers who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach of this policy which are found to have been made in bad faith will, however, be dealt with under our disciplinary procedure.
- 9.2. If, after investigation, you are proven to have harassed any other worker on the grounds of sex, marital status, sexual orientation, religion or belief, race, disability or age or otherwise act in breach of this policy, you will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We will always take a strict approach to serious breaches of this policy.

9.3. As this policy applies equally to our workers' relations with visitors, clients, customers and suppliers, if after investigation, you are proven to have discriminated against or harassed a client or supplier you will also be subject to disciplinary action.

10. Policy review & communication

10.1. This policy will be reviewed on an annual basis as a minimum or in the event of changes to legislation. All employees and new starters will be made aware of the policy, and we will ensure that our practices align with our EDI values and commitments.

Name: Gareth Pyne

Position: Managing Director

Date: April 2024

Signed