

# Equality & Diversity Policy

Guideline is committed to promoting equality, diversity and an inclusive and supportive environment for its staff, customers, suppliers and partners through compliance with any all relevant legislation including but not limited to The Equality Act 2010.

In particular, the company will:

- seek to ensure that people are treated equitably regardless of their gender, race, colour, ethnic or national origins, age, disability, socio-economic background, religious or political beliefs and affiliations, marital status, family responsibilities, sexual orientation or other inappropriate distinction;
- promote diversity in its staff by recognising the particular contributions to the achievement of the company's goals that can be made by individuals with a wide range of backgrounds and experiences;
- promote and maintain an inclusive and supportive work and learning environment, which affirms the rights of individuals to be treated with respect and fairly and affords opportunities to fulfil their potential.

#### **Implementation**

The company's commitment to confronting inequality and celebrating diversity will be put into practice through the directors, management and supervisory teams. The following paragraphs set out the responsibilities of individuals.

## Responsibility

- The managing director has ultimate executive responsibility for the effective development and implementation of the Equality & Diversity Policy, the Race Equality Policy, the Policy on Religion and Belief, the Personal Harassment and Bullying Policy and the Disability Policy.
- The managing director is responsible for demonstrating commitment and providing leadership in promoting these policies and associated practices are implemented effectively and that managers and supervisors at all levels are aware of their responsibilities in this area, receive appropriate training and support and carry out these responsibilities satisfactorily.
- The board of directors is responsible for the development, implementation, monitoring, prioritisation and review of policies, procedures and practice to support the company's equality strategy and action plans and for the overall Equality & Diversity Policy in relation to staff, customers, suppliers, visitors and others closely associated with the company.
- The managers and supervisors have overall delegated responsibility for coordinating the day to day operation of the policies and the development, maintenance and monitoring of supporting procedures.

# The Race Equality Policy Statement

As part of the company's core commitment to promoting equality and diversity, we aim to operate in an environment where the racial and cultural backgrounds of all individuals are respected.

Guideline, as part of its core commitment to promoting equality and diversity as well as an inclusive and supportive environment for people it is closely associated with it, commits itself to:

- Promoting race equality and good relations between people of different racial groups in all areas of its activities; and
- Taking action to prevent racial discrimination, including racial harassment and bullying, and ensure that people are treated fairly and with respect.

Implementation: This commitment will be realised by:

- Including this commitment to promoting race equality and anti-racist practice as a central part of the company's planning process.
- Consulting with staff and, where required, representatives from the local community, including people from diverse racial groups, on the action that needs to be taken to promote race equality and eliminate racism.
- Establishing a process to build race equality into all relevant policies and procedures. Particular priority will be given to those processes relating to the following functions which are seen as having high relevance to race equality: recruitment; selection; induction; training, development and learning; professional, personal and career development; discipline, grievance and appeals; living and working environment; partnerships and community links; procurement and outsourcing.
- Assigning responsibility to designated individuals for implementing the agreed policies and actions.
- Monitoring and assessing the progress and effectiveness of the policies, procedures and actions, particularly their impact on staff and others from different racial groups; and identifying where improvements should be made.
- Taking action to prevent racist behaviour against individuals or groups, including racial harassment and bullying; to deal promptly with any incidents that do arise and are reported, in accordance with its Personal Harassment Procedure and formal complaint/grievance procedures; and, to record and monitor such reported incidents and report on these annually.
- Providing, where necessary, anti-racism and awareness training to support the implementation of this policy.

Staff and people closely associated with the work of the company including visitors, contractors, consultants and suppliers, are expected, in addition to any specific responsibilities individuals may have for promoting racial equality, to show respect to others whatever their race, culture, ethnic or religious background, to be able to identify incidents of racism, including racial harassment, towards individuals or groups and to take appropriate action to prevent or report such incidents. In addition they are expected to participate in any necessary training activity provided by the company relating to promoting racial equality and preventing racial discrimination.

Managers and others responsible for implementing disciplinary, grievance and complaints procedures are responsible for ensuring that these are operated fully and fairly in dealing with complaints of racial discrimination, including harassment and bullying.

## Policy Statement On Religion And Belief

As part of the company's core commitment to promoting equality and diversity, we aim to operate in an environment where the religious and non-religious beliefs of all individuals are respected.

The company demonstrates this commitment by ensuring that the following applies:

- Individuals are not treated less favourably than others because of their (or your own) actual or perceived religion or belief or non belief;
- Practices or provisions apply equally to persons of all religious beliefs or nonbelief;
- Practices or provisions do not put people of the same religion or belief at a disadvantage when compared to other persons.

The company provides a diverse environment, to encourage discussion, and embrace the critical exploration of questions concerning religion, belief and nonbelief.

The company expects individuals and groups to respect the freedom of others to express their convictions, religious beliefs or non belief in their own terms. It is also committed to the principles of free enquiry and free speech within the law.

The company is committed to preventing religious discrimination. This includes the duty to protect people from aggressive, manipulative or covert forms of proselytism.

The company seeks to ensure that:

- The company's policies are based on relevant criteria, which do not discriminate on grounds of religion, religious belief or similar philosophical belief (except in the case of a genuine occupational requirement).
- Individuals and groups are treated with dignity and fairness whatever their religious and/or other beliefs may be.
- The company's services are provided to meet the cultural and religious needs of all people.

The right to freedom of thought, conscience and religion is absolute, but the right to express beliefs is qualified by the need to protect and recognise the rights and freedoms of others to work and develop.

# Guidance on the Implementation of the Policy on Religion & Belief

#### Religious Observance

The company will consult with staff so that religious observance can be accommodated into the working day as far as is practicable. Additionally, reasonable provision of space and facilities for religious observance will be accommodated wherever it does not cause undue inconvenience to others as far as is practicable.

All staff regardless of religious belief or similar philosophical belief, are required to work in accordance with their contract. Requests for temporary adjustments to work arrangements will be facilitated as far as is practicable, subject to sufficient notice of religious observance requirements.

#### Religious Leave

Statutory and customary holiday arrangements include Christmas and Easter, both of which are Christian religious festivals. Those staff practising other religions or comparable philosophical belief will normally be entitled to take three days of their holiday entitlement on the dates of most significance to them. Further requests for holiday entitlement to be taken at times of religious significance will be treated sympathetically.

For all staff, regardless of any religious belief or similar philosophical belief, the number of annual leave days overall will remain as in the contract of employment. However, the Company will consider the circumstances for leave of absence on religious grounds and will inform the member of staff of the reasons if leave is to be refused.

So far as is practicable, due consideration will be paid to major religious celebrations, festivals and ceremonies, to avoid any possible impairment of the staff member. Staff should inform their line manager of approximate date(s) of any festival as soon as they are known, so that appropriate measures can be taken.

## Dress Code

The Company welcomes the diversity of appearance that people from different religious and belief backgrounds can bring. However, given the nature of the company's business, there may be health and safety considerations that would restrict certain modes of dress in particular contexts. In such cases, it will be necessary for the Company to consult with staff who may be affected by a restriction to see if an appropriate compromise can be reached.

#### Food Requirements

The Company responds positively to requests for food that meets special dietary requirements (e.g. vegetarian, kosher, halal).

All members of staff are responsible for familiarising themselves with this policy, for informing appropriate colleagues of their particular requirements, and for making up any time lost as a result of cultural/religious observance.

#### Personal Harassment And Bullying Policy

As part of the company's core commitment to promoting equality and diversity, we aim to operate in an environment where harassment and bullying of any persuasion are not tolerated; the rights of all individuals will be respected.

The Company is committed to promoting equality, diversity and an inclusive and supportive environment for its staff and others closely associated with its work, and affirms the rights of individuals to be treated fairly and with respect.

Sexual, racial and other forms of personal harassment and bullying can seriously harm working and social conditions for both students and staff at the Company.

If you believe you are being subjected to sexual, racial or other forms of harassment, including bullying, do not feel it is your fault or that you have to tolerate it.

The Company will take action in cases of harassment:

- When the people involved are staff or others closely associated with the Company, clients or customers such as contractors, deliverers etc.
- When the behaviour causing the harassment takes place on Company premises or elsewhere, such as at client or supplier locations.
- When the behaviour causing the harassment takes place during normal working hours or outside these.

The action may just involve offering support and guidance to help you take action yourself to stop the harassment or may involve Company management taking action on your behalf. In serious cases, it may involve a formal investigation through the disciplinary procedures, however, in the majority of cases a resolution will be sought by less formal routes. Any action taken will be agreed with the complainant, and you will be kept informed throughout the process. A timescale will also be agreed which will take into account the need to resolve the situation as soon as practicable, whilst taking into account the circumstances.

## What is harassment?

Personal harassment takes many forms. Basically, it is any behaviour which is unacceptable to the recipient and which creates an intimidating, hostile or offensive environment. This can be particularly serious if the harasser is in a position of organisational power in relation to the person harassed.

People who are being harassed often feel isolated and stressed, and this can significantly affect their work and life. It is, therefore, important to seek help as soon as possible, if you feel you are being harassed.

Any behaviour which shows lack of respect and which creates an atmosphere in which people feel uncomfortable and unwelcome can constitute harassment.

Differences of attitude and culture or misinterpretation of social signals can mean that what is perceived as harassment by one person may not seem so to another.

## Sexual harassment – could include:

- any behaviour which patronises, intimidates or offends, e.g. remarks, looks, jokes or offensive language
- any behaviour which makes people feel viewed as sexual objects and which causes offence, even if unintended
- provocative suggestions, propositioning people
- the display of pornographic, semi-pornographic or suggestive material, electronic or paper
- deliberate, potentially objectionable physical contact to which the person has not consented or had the opportunity to object to
- promises of success, promotion or other rewards in exchange for sexual favours.

Although this most often involves women being harassed by men, the Company's policy applies equally well to harassment occurring between people of the same gender, or of men by women.

## Racial harassment – could include:

- any behaviour which causes discomfort, intimidates or offends or which incites others to do so derogatory names, insults, racist jokes or ridiculing cultural difference
- the display or circulation of offensive material, including racist graffiti, electronic mail or information published through the Internet
- verbal abuse and threats of physical attack

# Personal harassment – could include:

- behaviour which makes direct or indirect reference to disability or impairment and thus causes discomfort, patronises, insults or offends people with a physical, sensory or mental disability
- behaviour which makes direct or indirect reference to religion or culture thereby causing discomfort or offence
- repeated gibes in relation to personal traits, appearance or sexual orientation
- invasion of privacy or practical jokes causing physical or psychological distress
- pressure to become involved in anti-social or criminal behaviour
- messages to or about a person, including electronic mail, that are offensive, insulting or cause discomfort

# Bullying

Bullying is the misuse of power or position to persistently criticise and condemn; to openly humiliate and undermine an individual's ability until this person becomes so fearful that their confidence crumbles and they lose belief in themselves. These attacks on the individual are normally sudden, irrational, unpredictable and usually unfair.

## Bullying could include:

- verbal and/or physical intimidation threats, shouting, derisory remarks, often in front of others
- ostracism, or conversely, excessive supervision
- undermining of the individual's position by changing work objectives/guidelines without consultation, taking credit for the target's work, deriding the target's work to supervisors, etc.
- removing areas of responsibility and giving people menial or trivial tasks to do instead
- withholding information
- spreading malicious rumours
- persistent criticism
- messages, including electronic mail, that are threatening, derisory or defamatory

#### What to do...

If you feel you're being harassed or bullied by others:

- If at all possible, make it clear to the person causing offence that such behaviour is unacceptable to you.
- If you feel unable to confront the person directly or if talking to them has no effect:
- Seek a confidential interview with your line manager
- Talk the problem through with a friend and with another member of staff

If you are not sure who sent an electronic message, we may be able to identify the sender and take appropriate action without compromise to your confidentiality.

#### How confidential will it be?

The managers and directors are concerned members of staff who will be prepared to discuss any matter with you, however sensitive. They will listen carefully to you, then inform you about your choices of action, and help you decide what, if anything, you wish to do or have done about the harassment.

Whatever you say to them will be treated in the strictest confidence and will not be divulged without your permission.

The preferred outcome of the Company's harassment policy is that people against whom complaints are made change their behaviour to remove the cause of the harassment. There are various means of achieving this and there are many examples of complaints being resolved to the complete satisfaction of the complainants.

#### **Disability Policy**

As part of the company's core commitment to promoting equality and diversity, we aim to operate in an environment where people are not excluded on the basis of disability and disadvantage; all individuals are respected.

The Company is committed to meeting the requirements of the Disability Discrimination Act 1995 and to the implementation of a policy to achieve equality of opportunity for its staff and students.

This fundamental commitment is set out in the Company Equal Opportunities Policy Statement, which affirms that discrimination is unacceptable within the Company in that it represents a waste of human resources and a denial of individual opportunity.

Disability discrimination: covers discrimination against people with disabilities who on account of injury, illness or inherited conditions may be disadvantaged in obtaining or keeping employment for which otherwise suitable. Disability covers physical or mental impairment which has a substantial or adverse effect upon the person's ability to carry out normal day to day activities

In relation to disability, discrimination occurs if, for a reason which relates to a disabled person's disability, that person is treated less favourably than others to whom the reason does not apply and this treatment cannot be justified.

For the purposes of this policy, however, disability is broadly defined. It includes not only those disabilities which may immediately be apparent, but also conditions such as dyslexia, diabetes, asthma, epilepsy, hearing or sight impairments and mental health difficulties. Members of staff are encouraged to seek advice, even if they do not meet the formal definition given in the legislation or the condition is not among those listed above. It is the intention of the Company to offer appropriate support based on individual requirement. The following sections aim to give substance to that commitment.

#### <u>Aims</u>

The Company values the contribution of all individuals irrespective of disability and affirms that staff should be able to participate in the life and work of the Company. As such, the Company is committed to ensuring that appropriate and reasonable support is offered to members of staff with disabilities.

There is a positive duty on Directors, managers and supervisors to take into account the needs of staff with disabilities and to follow the advice laid out in this guide. This includes safety aspects in seeking to establish working conditions which encourage the full participation of people with disabilities and obtaining guidance in relation to reasonable and practicable adjustments to work or to the working environment to meet the ascertained needs of staff.

This guide outlines the support available to ensure that requirements are identified and suitable and appropriate provision is made.

#### Record of Staff Disabilities

In order to assist in the development of appropriate policies and arrangements to support staff with disabilities, the Company seeks to maintain information on the nature of disabilities experienced by members of staff and the number of staff so affected. The basis of that record is self-assessment by each member of staff. All colleagues are encouraged to respond positively in providing such data whenever periodic requests are circulated to them. Any change which may arise in intervening periods should be notified in writing to the Managing Director.

It is in the interests of the Company and all its staff that a comprehensive and up-todate record is maintained in this area and the co-operation of all staff is sought in this regard.

#### **Recruitment and Selection**

The Company welcomes applications from those with disabilities and has taken steps to raise awareness of disability within the organisation. In particular awareness training will, where required, be targeted at staff involved in recruitment.

Applicants are encouraged to provide information on any practical requirements so that the Company can take them into account in its application and interview arrangements.

The Company will consider making supportive arrangements, appropriate to the requirements of an applicant, which may include:

- Provision of post details in an alternative format
- Ensuring ease of accessibility to the interview room and building
- Provision of a signer, interpreter or assistant at interview
- Provision of additional aids or equipment for use in assessment tests or the interview
- At interview, consideration of candidates and the decision on the appointment to the post in question will be based upon the suitability of the applicant's qualifications, experience and skills for the post.

# Appointment

Individuals offered appointment and who may require adaptations will be asked about their needs and whether there is anything that their new colleagues will need to be made aware of at the time of taking up post. Where reasonably possible, adjustments and adaptations identified as needed will be made.

Initial discussions should take place with the Head of Department who may refer the matter where necessary to the Board, who will liaise with the new staff member. As necessary, expert advice may be sought to advise on adaptations.

#### **Retention**

The Company will seek to enable staff who become disabled, or where an existing disability progresses or worsens, to remain in their existing jobs with suitable adjustments, before considering other alternatives.

As appropriate, advice will be sought from Disability Employment Advisors or other organisations and agencies who can offer specialist advice on adaptations, equipment or training. Sympathetic consideration will be given to requests for reduced or part-time duties whether on a temporary or permanent basis.

#### Adjustments

A confidential discussion will be arranged in which the matter of appropriate adjustments to accommodate a disability can be discussed. Specialist or expert advice may be sought to assist in the process.

Many adjustments cost little or nothing to implement other than the adoption of a positive approach to providing assistance to resolve problems faced by a colleague.

In other cases the cost of a reasonable adjustment will need to be identified as partof the assessment process. Examples of the kind of adjustments that may be considered include:

- Adjustments to premises
- Re-organisation of duties and or roles
- Alteration to work hours
- Time off for rehabilitation, assessment or treatment
- Acquiring or modifying equipment
- Modifying instructions or reference manuals
- Modifying procedures for testing or assessment
- Enhanced supervision

In the case of some disabilities, it may be possible to obtain from external sources funding to cover either in full or in part adaptations and the costs of providing a reader or interpreter to support the member of staff concerned.

The Company will consider the extent which any step would help to improve the position and how practical it is to take any particular measure. While it may not be possible to do so in all circumstances, the intention is to provide appropriate assistance to staff and to take a positive attitude to making adjustments.

#### Access and Egress

The Company has established programmes of work aimed to continually improve the accessibility of the office for those with disabilities.

In addition to access, the Company gives due consideration to the problems of egress from buildings faced by disabled staff given that during an emergency evacuation.

In order to cater for those with disabilities (such as sight, hearing or mobility impairment), managers and supervisors are responsible for ensuring that there are adequate arrangements for the safe evacuation of such staff and for the preparation, if required, of Personal Emergency Egress Plans (PEEPs).

PEEPs represent an essential step in catering for the needs of staff with disabilities in the event of emergencies. Details of such plans vary according to the building involved and the nature of individual disabilities. Preparation of PEEPs must involve the staff members concerned and the Safety Officer.

As far as is reasonably practicable, the Company seeks to establish and maintain an environment for people that is safe and without risks to health. It also aims to provide and maintain plant, equipment and systems of work that are safe and without risks to health, and seeks to ensure safe means of access to and egress from all places within its control;

Managers and supervisors must take into account any temporary (e.g. a broken leg) or permanent disability when carrying out risk assessments so that the appropriate risk control measures can be put into place - for example, visual and other signals for those with impaired hearing who cannot hear alarms.

Information about disability is made available by relevant administrative offices to Departments which are enjoined to take the necessary steps to comply with Company policy.

## <u>Miscellaneous</u>

#### Sub contractors

The nature of the business is such that a number of sub contractors are used as both specialist sub contractors and to manage the vagaries of demand. Obviously, as these sub contractors are acting on the company's behalf and in direct contact with the company's clients, they are required either to provide their own policies on these subjects or subscribe to our own.

In addition as part of our subcontract review process sub contactors are, where required, asked to confirm that they have not had any unlawful discrimination made against them by any court, employment tribunal or other body such as the Commission for Racial Equality and the Disability Rights Commission in the last 3 years.

#### **Communication**

All policies and procedures including those herein are available in both hard copy format and on the company intranet.

All staff are inducted into the organisation are given a copy of these and other policies, which are discussed and reviewed as part of the induction process. This general awareness is developed further for individuals taking on new supervisory and managerial responsibilities. These individuals are where required given more detailed training which will include exposure to these and other policies as needs dictate.

Additionally, there are ad hoc training and communication activities held from time to time to ensure that awareness of these issues remains uppermost in people's minds.

#### **Complaints**

Staff who believe that they have been discriminated against or feel that they have not been treated fairly in accordance with these policies and procedures have the right to pursue the matter. Normally this will be by first raising the issues with their line manager.

If the complainant is dissatisfied with the outcome of this stage, or considers it inappropriate to use that stage, their complaint may be pursued by referring the issue to a director or by using the grievance procedure.

The company will then ensure that the complaint is investigated and that the complainant receives a written response, which should include a summary of any action taken where applicable.

An individual who makes a complaint does not prejudice any statutory rights to complain to the courts or to an Employment Tribunal as appropriate, or to seek advice and assistance from the Commission for Racial Equality, the Equal Opportunities Commission, the Disability Rights Commission or any other appropriate body.

The Company will seek to protect individuals from any form of victimisation arising from their taking action in relation to their rights under the relevant legislation or making any complaint under these procedures.

Complaints from visitors and others associated with the Company should be addressed to the managing director.

## Monitoring, evaluation & review

These Policy Statements will be monitored and evaluated by the company's board of directors on an ongoing basis. More formally, these Policy Statements will be reviewed every three years in conjunction with the overall Equality & Diversity Policy. It is open to review the Policy Statement earlier as a result of the ongoing consultations with staff, community representatives or changes to the law.

#### Breaches to these policies:

Any discriminatory behaviour by individuals or groups will be regarded as serious and may culminate in disciplinary proceedings and ultimately, dismissal.

Bill

Signed: Martin Oliver Position: Managing Director

Dated: 01 September 2024