

Equality, diversity and inclusion policy

As a company we are committed to the promotion of equality of opportunity, to provide an inclusive and diverse workplace, and to avoid unlawful discrimination in employment and against customers and suppliers.

We understand that our employees, customers and suppliers have diverse characteristics and different experiences, needs and aspirations. We recognise that people with different backgrounds, skills, attitudes and experiences bring fresh ideas and perceptions. Understanding, valuing and effectively managing these differences can result in benefits at an individual, team and organisational level.

We are committed to creating an inclusive working environment where individual differences are valued and respected, in which each employee is able to fulfil their potential and maximise their contribution.

We wish to ensure equality of opportunity and treatment for all and it is our aim to ensure that no employee or job applicant receives less favourable facilities or treatment on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation or are placed at a disadvantage by imposed conditions or requirements which cannot be shown to be justified.

An important aspect of ensuring equal opportunities in employment is achieving a work environment where everyone is treated with dignity and respect in line with our core values, free of harassment and bullying of any kind. HR Wallingford will not tolerate bullying, harassment or discrimination.

This policy is intended to assist us in putting our commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination. For specific guidance in relation to harassment, sexual harassment and bullying, please refer to our Anti-Harassment and Bullying policy.

This policy is not contractual.

1. Definitions

Equality is about the fair treatment of everyone and often linked to the legislation, The Equality Act 2010.

Diversity is the mix of people.

Inclusion is the culture in which the mix of people can come to work, feel comfortable and confident to be themselves, work in a way that suits them and delivers our business needs. Inclusion will ensure that everyone feels valued and importantly, adds value.

Bullying is behaviour from a person or group that's unwanted and makes you feel uncomfortable, including feeling intimidated, degraded, humiliated or offended.

Harassment is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and

ethnic or national origins), disability, sexual orientation, religion or belief and age, that has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person, even if this effect was not intended by the person responsible for the conduct.

Sexual Harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile degrading, humiliating or offensive environment for them. A single incident can amount to sexual harassment. It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex.

2. The law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.

Staff should not unlawfully discriminate against or harass other people including current and former staff members, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events,

There is a positive duty on employers to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. Similarly, this duty applies to making reasonable adjustments to provisions, criteria or practices to accommodate the needs of an individual. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

3. Types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another because of an actual or perceived protected characteristic and, in the case of age only, such treatment is not justified. An example of direct discrimination would be refusing to employ a woman because she is pregnant. Direct discrimination may also occur where a person is treated less favourably due to an associated person's protected characteristic.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct. Harassment and sexual harassment more specifically is dealt with in our Anti-harassment and bullying policy.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and (according to guidance from the Government and Acas) pregnancy and maternity).

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he/she is suspected of doing so. However, an employee is not protected from victimisation if he/she acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare his/her treatment with someone who has not made or supported a complaint under the Equality Act 2010. For example, if a blind employee raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation.

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

4. Objectives

We have set a number of objectives, as follows:

Equality

- We will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits.

- Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job and candidates for jobs or promotions at HR Wallingford shall be assessed on the basis of their suitability, capability and qualifications.
- Disability and personal or home commitments will not form the basis of employment decisions except where necessary.
- We will strive to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect.

Diversity

- We will continue to understand the current diversity of our organisation e.g. through the gender pay gap, through our engagement survey and other relevant methods.
- We will communicate how diversity contributes to our organisational values and the link to our goals and objectives.
- We will take positive action to increase the diversity of our internal and external recruitment and selection pools.
- We will continue to benchmark, measure and report our diversity and inclusion metrics allowing us to set clear goals using our own metrics and benchmarks from our engagement survey.

Inclusion

- Through our Diversity working group will seek to create an inclusive workplace in which people are accepted as individuals, regardless of their differences and where they feel their contribution is valued.
- We will support our people to recognise that some groups and individuals have particular and specific requirements that need to be met if they are to enjoy working at HR Wallingford.
- We will seek to better understand staff feedback on inclusion and act upon the results.
- We will review our policies and procedures to ensure that they take appropriate account of the diverse needs of our employees, customers, and stakeholders.

5. Dignity at work/bullying and harassment

We have a separate bullying and harassment policy concerning issues of bullying and harassment on any ground (including sexual harassment), and how complaints of this type will be dealt with.

6. Customers, suppliers and non employees

We will not discriminate unlawfully against customers, suppliers and visitors using or seeking to use goods, facilities or services provided by HR Wallingford.

If you feel you have been bullied or harassed by a customer, supplier, visitor or other third party in the course of your work, you should report the matter to your line manager immediately who will take appropriate action and not attempt to resolve it yourself.

7. Responsibility

To ensure that this policy is fully effective, we have appointed a Board level sponsor with responsibility for its implementation to the Directors. They will ensure that the policy is implemented within their own areas of responsibility and will deal with any matters arising, taking advice from Personnel when appropriate.

We have set up a Diversity working group who is responsible for proposing and implementing actions to support the effective implementation of this policy.

Specialist advice, training, guidelines on policy implementation, and the submission of any required reports on the policy, will be the responsibility of Personnel.

As a consequence of this we have agreed the following actions:

- to take appropriate action in accordance with the established procedures within disciplinary rules and procedures against employees who are found to infringe this policy;
- to provide guidance and training as and when required, particularly to line managers;
- to ensure that employees are aware of their responsibilities under the current Equality Act 2010;
- To monitor the outcome of the policy and to regularly examine and review existing procedures and criteria in the implementation of the policy.

8. Roles and responsibilities

Employees, including those working from home, whether on full-time, part-time, indefinite, fixed or temporary contracts, regardless of length of service, are responsible for playing their full part in adhering to the policy. This means becoming familiar with the policy and its requirements and carrying them out, as well as critically examining attitudes to ensure that discrimination is not allowed to affect judgement. The law and the existence of an Equality Diversity and Inclusion Policy cannot by themselves prevent unjustified discrimination. You can help to do this by:

- Treating your colleagues with dignity and respect; valuing the differences that exist between people and cultures
- Being aware of how your own behaviour may affect others and changing it, if necessary - you can still cause offence even if you are "only joking";
- Being aware of the forms which unjustified discrimination can take, to guard against them and to avoid any action that might influence others to discriminate unfairly
- Taking a stand if you think inappropriate jokes or comments are being made;
- Making it clear to others when you find their behaviour unacceptable, unless it should be obvious in advance that this would be the case;
- Intervening, if possible, to stop bullying or harassment and giving support where appropriate;
- Making it absolutely clear that you find bullying and harassment totally unacceptable; and
- Reporting bullying or harassment to your manager or human resources and supporting HR Wallingford in the investigation of complaints.

Line managers are responsible for the above along with:

- Implementing this policy and related processes and for monitoring the implementation in the day-to-day activities of their business area or function;
- Setting a good example by their own behaviour;
- Ensuring that there is a supportive working environment;
- Making sure that staff know what standards of behaviour are expected of them;
- Intervening to stop bullying or harassment;
- Reporting promptly to Personnel any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them;
- Ensuring facts are established with regard to alleged bullying and harassment, and
- Taking appropriate action, with support from Personnel, against employees found to have infringed this policy.

Personnel is responsible for the above, along with supporting the line managers and:

- Ensuring that employees are aware of their responsibilities under this policy;
- Providing guidance as and when required, particularly to the relevant decision makers;
- Ensuring training is made available to line managers to support the management of staff in an effective, fair and respectful manner.
- Supporting line managers to take appropriate action against employees found to have infringed the policy in accordance with HR Wallingford procedures;
- Monitoring the effectiveness of this policy through anonymous surveys and other means, and to keep under review procedures and criteria in the implementation of the policy, in discussion with employee representatives.

Employees are encouraged to, where they are or become disabled during their employment, discuss their condition with their Line manager or HR team so that the Company is best placed to help and support them.

9. Monitor and review

This policy will be monitored periodically by the organisation to judge its effectiveness and will be updated in accordance with changes in the law. We treat personal data collected for reviewing equality of opportunity in recruitment and selection in accordance with the data protection policy. Information about how data is used and the basis for processing is provided in the Employee Privacy Notice.

10. Training

All employees will be provided with equal opportunities training as part of their induction process.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives with regard to equal opportunities.

11. Complaints

If you believe that you are suffering or have suffered from discrimination you can, if you wish, raise the matter informally with the person you believe is responsible. Alternatively, you may raise the matter in accordance with the Grievance Procedure.

If you believe you have been harassed, bullied or victimised, then you may also bring a grievance or raise the matter in accordance with our Anti-Harassment and Bullying policy.

Anyone raising an allegation of discrimination in good faith will not be victimised or subject to any form of detriment. However, false allegations or those made in bad faith will be treated as a disciplinary matter under the Disciplinary Procedure and may result in disciplinary action up to and including dismissal.

12. Breaches of this policy

All staff must comply with this policy and any breaches will be taken very seriously. Any breaches by an employee are likely to be treated as gross misconduct and result in action being taken under the Disciplinary Procedure up to and including summary dismissal.

If any other (non-employee) member of staff fails to comply with this policy then we may decide to stop providing that member of staff with work or terminate their contract with us immediately and without any notice or compensation.

You may also be personally liable for the payment of compensation as a result of unlawfully discriminating against another person.

If you consider that this policy has been breached, you are encouraged to raise your concerns with your manager as soon as possible.

13. Customers and service providers

We are generally free to decide whether to accept instructions from any particular customer. However, no customer will be refused our assistance because of a protected characteristic. We will assist customers and potential customers as required under the Equality Act 2010 and take any further lawful positive action to assist them where it seems such action is appropriate.

All staff, suppliers, agents and other third parties engaged by us are chosen on merit and suitability for the relevant task. Such decisions are untarnished by discrimination.

14. Territory

This policy has been prepared principally with reference to the laws of England and Wales, but the Company is committed to compliance with the laws and regulations of all jurisdictions in which it operates. This policy shall accordingly be read and interpreted, as far as is possible, so that it is line with the applicable legal jurisdiction and the Company reserves the right to depart from the terms of this policy as may be necessary to comply with legal requirements.

Ridha Bentiba
Executive Director, HR Wallingford Ltd

Signed:



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