



Equality and Diversity Policy

Introduction

The Company is committed to creating a working environment that is inclusive, respectful, and free from unlawful discrimination, harassment, and victimisation. Our objective is to ensure that all employment-related decisions are based on merit, fairness, and business needs.

We value diversity within our workforce and believe that an inclusive culture enables individuals to perform at their best, supports wellbeing and strengthens the organisation. We are committed to complying fully with our legal obligations under the Equality Act 2010 and related legislation.

This policy has the full support of the Company Directors and Managers. Appropriate training will be provided to support understanding and compliance with this policy. Attendance at mandatory training will be required where notified.

Status of this Policy

This policy does not form part of any employee's contract of employment and does not confer any contractual rights. The Company reserves the right to amend this policy at any time. Employees will be notified of any material changes.

Scope and Application

This policy applies to:

- All employees (including permanent, fixed-term and part-time employees)
- Workers and agency workers
- Contractors and consultants
- Job applicants
- Anyone engaged in work-related activities on behalf of the Company

The policy applies:

- In the workplace
- Outside the workplace where activities are work-related, including business travel, training, conferences, customer, or supplier events and work-related social events
- At any time when an individual is representing the Company or wearing Company uniform

Responsibility for this Policy

Overall responsibility for this policy lies with the Company Directors, supported by Managers, who are responsible for its day-to-day implementation.

Managers are responsible for:

- Applying this policy fairly and consistently
- Promoting inclusive working practices
- Challenging and addressing inappropriate behaviour
- Supporting employees who raise concerns
- Ensuring decisions relating to recruitment, training, promotion, performance management, discipline, and dismissal are free from unlawful discrimination

All employees have a personal responsibility to comply with this policy and to treat colleagues, customers, suppliers and visitors with dignity and respect.

Statement of Principle

The Company is committed to equality of opportunity and will not unlawfully discriminate against any individual because of a protected characteristic under the Equality Act 2010, namely:

- Age
- Disability (past or present)
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origins)
- Religion or belief
- Sex
- Sexual orientation

The Company also recognises its legal obligations not to discriminate unlawfully on other grounds, including:

- Trade union membership or non-membership
- Part-time or fixed-term status

No employee or job applicant will be disadvantaged by conditions, requirements or practices that cannot be objectively justified as a proportionate means of achieving a legitimate business aim.

These principles apply equally to the way in which employees treat colleagues, customers, clients, suppliers, contractors, and visitors.

Prohibited Forms of Discrimination

The Company prohibits all forms of unlawful discrimination, including:

Direct Discrimination

Treating someone less favourably because of a protected characteristic. This includes discrimination because of association with someone who has a protected characteristic, or because of a perceived protected characteristic.

Indirect Discrimination

Applying a provision, criterion or practice that disadvantages people with a protected characteristic and which cannot be objectively justified by legitimate business needs.

Discrimination Arising from Disability

Treating a disabled person unfavourably because of something connected to their disability, where this cannot be objectively justified.

Failure to Make Reasonable Adjustments

Failing to take reasonable steps to remove disadvantages experienced by a disabled person.
Harassment

Unwanted conduct related to a protected characteristic that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Harassment may also be sexual in nature.

Victimisation

Treating someone less favourably because they have raised, supported, or intend to raise a complaint or concern under this policy.

Employment Practices

Recruitment and Selection

The Company aims to ensure that recruitment and selection processes are fair, objective and based solely on the requirements of the role.

- Job requirements and selection criteria will be clear, relevant, and job-related
- Stereotypical assumptions based on protected characteristics will be avoided
- Reasonable adjustments will be offered to applicants where required
- No applicant will be disadvantaged by unjustifiable requirements or practices

Training, Development and Promotion

Decisions relating to training, development and promotion will be based on merit, skills, performance, and business needs.

- Opportunities will be communicated fairly and openly where appropriate
- Employees will not be unlawfully excluded from opportunities due to protected characteristics
- Training needs will be identified in line with business requirements

Working Conditions and Terms of Employment

The Company will:

- Apply terms and conditions of employment fairly and without unlawful discrimination
- Seek to accommodate cultural or religious practices where reasonably possible
- Ensure that disciplinary, grievance, attendance management, and performance processes are applied consistently and objectively

Part-Time and Fixed-Term Workers

Part-time and fixed-term employees will not be treated less favourably than comparable full-time or permanent employees without objective justification.

Where appropriate, pay and benefits will be applied on a pro rata basis. Part-time and fixed-term employees will have equal access to training, development, and redundancy selection processes.

Termination of Employment

The Company will avoid unlawful discrimination in decisions relating to dismissal, redundancy or non-renewal of contracts.

Where possible, dismissal decisions will be made or reviewed by a Director or nominated senior manager. Feedback from leavers may be sought to support continuous improvement.

Disability and Reasonable Adjustments

Employees are encouraged to inform the Company if they have, or develop, a disability so that appropriate support can be considered.

The Company will:

- Discuss reasonable adjustments with the individual
- Consider medical or occupational health advice where appropriate
- Monitor physical features of the workplace to identify potential barriers
- Take reasonable steps to improve access and working arrangements

If a particular adjustment is not considered reasonable, the reasons will be explained and alternative solutions explored where possible.

Training and Awareness

Equality, diversity, and inclusion training will be provided to employees as appropriate. Managers will receive additional training to ensure they understand their responsibilities under this policy and are equipped to handle issues fairly and lawfully.

Relationships with Customers and Suppliers

Employees must not discriminate against customers, clients, suppliers, or visitors. The Company also expects third parties to treat its employees with dignity and respect.

The Company will take appropriate action where discriminatory behaviour by customers or suppliers is identified.

Raising Concerns and Complaints

Anyone who believes they have experienced or witnessed discrimination, harassment or victimisation is encouraged to raise the matter promptly.

Concerns may be raised:

- Informally with a manager, or

- Informally through Shrewd HR – confidential@shrewd-hr.co.uk
- Formally through the Company's Grievance Procedure

Complaints will be treated seriously, sensitively, and confidentially. Individuals who raise concerns in good faith will not be victimised or treated less favourably as a result.

Breaches of this Policy

Any breach of this policy may result in disciplinary action, up to and including dismissal for gross misconduct.

Deliberately false or malicious allegations may also be treated as a disciplinary matter.

Monitoring and Review

The Company will keep this policy, and its associated procedures and practices, under regular review to ensure continued legal compliance and effectiveness.

Statement of Principle

The Company is committed to a policy of treating all its employees, workers and job applicants equally. No employee or potential employee will receive less favourable treatment because of any 'Protected Characteristic, namely:

- age
- disability (past or present)
- gender re-assignment
- marriage and civil partnership
- pregnancy and maternity
- race, colour, nationality, ethnic or national origins
- religion or belief
- sex
- sexual orientation
- trade union membership (or non-membership)
- Part time or fixed term status.

No employee will be disadvantaged by any conditions of employment that cannot be justified as necessary on operational grounds.

These principles of equality or opportunity and non-discrimination also apply to the manner in which our staff treat clients/customers, our business partners, and visitors.

Equality Principles

There should be no discrimination, whether direct or indirect, because of any of the protected characteristics set out in the Company's statement of principle on equal opportunities contained above. The types of discrimination that are prohibited are explained below.

Discrimination may occur in the following terms

Direct discrimination is when someone is treated worse than someone else just because of a protected characteristic. For example, it would be direct discrimination if a manager excludes an employee from a training course just because she is gay.

It is also direct discrimination when someone is treated worse than someone else 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 he thinks the colleague is gay.

Indirect discrimination: is when an apparently neutral practice or requirement disproportionately disadvantages one group and cannot be justified by the needs of the business. For example, imposing a requirement that job applicants must speak fluent English disproportionately disadvantages non-English groups 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 or when the business fails to make reasonable adjustments for a disabled person.

Victimisation: this is treating someone less favourably because they have asserted their right not to be discriminated against because of a protected characteristic. An example of this would be an employee claiming that they had been discriminated against on the grounds of their disability and then their manager deciding when they left not to give them a reference because they had claimed disability discrimination.

Harassment: this is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature or may occur because someone has harassed the victim and the victim either rejects or submits to it and, because of that rejection or submission, that person treats the victim less favourably. More information on what can constitute harassment is set out in the Company's bullying and harassment policy.

Disability discrimination: includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

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 on only 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 protected groups and which are not justified by the demands of the job.

Promotion and Training

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.

We will advertise promotion and transfer opportunities widely, including deputising opportunities and secondments which could lead to permanent promotion. We will try to ensure that training and development opportunities are made known to all relevant employees.

Training needs will be identified when we believe it is applicable for the business needs.

Working conditions and terms of employment

We will try to accommodate cultural or religious practices where we reasonably can.

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

We will ensure that decisions made under our disciplinary, grievance performance improvement and attendance management policies are carried out fairly and without discrimination.

Part – Time Working

This policy also covers the treatment of those employees and workers who work on a part-time basis, the Company recognises that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, parental and domestic incident leave and access to our pension scheme. It also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

Termination of employment

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

Where possible we will ensure that any decision to dismiss an employee is made by a Company Director or a nominated deputy. We will encourage leavers to give feedback about their employment.

Training on equalities

We will train all our employees on understanding and avoiding discrimination.

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, you should contact your manager to discuss your difficulties and reasonable adjustments that would help overcome or minimise the difficulty (your suggestions on adjustments, for the Company to consider, are welcomed and encouraged). The Company may wish to consult with you and your medical adviser about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

Your rights and responsibilities

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

All employees have a duty not to discriminate against each other and not to help anyone else do so.

Our relationships with customers and suppliers

You must not discriminate against any of our customers and suppliers. Equally, we expect our customers and suppliers not to discriminate against you and we will take appropriate action against any customer and 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. 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. Employees and contractors 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 procedure.

What will happen if you act in a discriminatory way?

If, after investigation, we decide that you have acted in breach of this policy you may be subject to disciplinary action up to and including dismissal. This applies to all levels of employees.