


CORPORATE DOCUMENT			
	Controlled		Effective Date: 03/2023
			Owner: Rhys Harris
Review Date:	03/2024	Related Docs:	Anti-Harassment and Bullying Policy Grievance Procedure Disciplinary Procedure
EQUALITY, DIVERSITY & INCLUSION POLICY			

Anderselite is committed to promoting equality of opportunity for all stakeholders and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

It is the policy of Anderselite (“the Company”) to provide equal opportunities in employment regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins (potentially including caste)), religion or religious or philosophical belief, sex or sexual orientation and any other characteristics protected by law. In this Policy, these are called the ‘Protected Characteristics’. These principles of non-discrimination and equality of opportunity also apply to the way in which we treat visitors, clients, customers, suppliers, and former colleagues.

This policy sets out our approach to equal opportunities, diversity, and inclusion, and the behaviours we expect from all colleagues in line with this commitment for the avoidance of discrimination at work. It applies to all individuals working at all levels and grades, including; senior managers, directors and employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, home workers, casual workers and agency staff (collectively “colleagues”) and all aspects of employment with us, including; recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

The Company’s policy is to treat all employees with respect and dignity, and to ensure that employees are not victimised or subjected to harassment or discrimination on the grounds outlined above, or similar inappropriate conduct.

All allegations of discrimination or harassment, or similar conduct, will be thoroughly and promptly investigated. Where allegations are substantiated, appropriate disciplinary action up to and including dismissal will be taken against any person responsible.

This policy does not form part of any employee’s contract of employment, and we may amend it at any time.


Responsibilities

The Executive Board and Group HR Director have overall responsibility for the effective operation of this policy. Day to day operational responsibilities, including regular review of this policy has been delegated to the HR department.

All Colleagues

All colleagues are responsible for:

- Actively supporting and contributing to Anderselite’s aim of providing an equal, diverse, and inclusive environment for all employees.
- Living our core value of Collaborative by embracing and celebrating a diverse workforce.
- Utilise resources provided by Anderselite in relation to the promotion of equality, diversity, and inclusion, including attending training, making use of toolkits and general information, and participating in EDI initiatives and activities.
- Provide feedback to their line manager and the HR department regarding continuous improvements that can be made to engender an equal, diverse, and inclusive working environment.
- Reporting any instances of discrimination, harassment, or victimisation that they encounter in the workplace.

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- Understanding that they, as well as Anderselite as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow colleagues, customers, suppliers and the public.

Managers

All line managers are responsible for:

- Understanding and being familiar with this policy and communicating its expectations to their team members.
- Actively supporting and contributing to the implementation of this policy and its goals.
- Actively promoting expectations regarding equality, diversity, and inclusion to their team members.
- Aligning their behaviours to the company values and commitments set out in this policy in order to lead by example.
- Creating a positive local working environment that is conducive to equality of opportunity, diversity, and inclusion.
- Encouraging their team members' participation in activities relating to equality and diversity.
- Actively participating in training around equality, diversity, and inclusion and seeking out additional advice and training where required.
- Supporting the implementation of this policy.

HR Department

The HR department are responsible for:

- Providing suitable training to managers and colleagues about their rights and responsibilities under this policy.
- Ongoing monitoring and development of the Group EDI Strategy.
- Ensuring any reports of discrimination, harassment, or victimisation are dealt with appropriately in line with the Disciplinary Policy.


Eliminating Discrimination and Exclusion

The Company and its employees must not unlawfully discriminate against or harass other people including current and former employees, 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.

Every Anderselite colleague has equal opportunities at work. Access to recruitment, training, and promotion is granted solely on the basis of individual ability and merit. We recognise, understand, actively seek, and value differences between people and groups of people within our company. We empower these individuals to work collaboratively. All our colleagues feel part of our workplace culture, that they play a key role in our success, and have equal access to all elements of our workplace, training, and career development.

The following forms of discrimination and similar acts of inappropriate conduct are prohibited under this policy and are unlawful:

(a) **Direct discrimination:** Direct discrimination occurs when an individual is treated less favourably because of one or more protected characteristics. Treating someone less favourably means treating them badly in comparison to others that do not have that protected characteristic. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination. Direct discrimination can also cover

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discrimination by association or perception. Discrimination by association might occur where a person is discriminated against by reason of their association with a person who has a protected characteristic. Discrimination by perception happens when a person is discriminated against because they are thought to have a particular characteristic when in fact they don't. (b) **Indirect discrimination:** Indirect discrimination occurs when a provision, criterion or practice (PCP) is applied but this results in people who share a protected characteristic being placed at a disadvantage in comparison to those who do not have the protected characteristic. If the PCP can be objectively justified it will not amount to discrimination. (c) **Harassment:** Under the Act, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. This includes unwanted conduct of a sexual nature. Harassment is dealt with further in our Anti-Harassment and Bullying Policy. (d) **Victimisation:** Under the Act victimisation occurs when an individual is treated unfavourably because he/she has done a 'protected act' which is bringing a claim for unlawful discrimination or raising a grievance about discrimination or giving evidence in respect of a complaint about discrimination. (e) **Disability discrimination:** this 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.

Commitment

Anderselite are committed to ensuring that equality of opportunity is maintained in the following areas:


- Recruitment and selection
- Training and development
- Opportunities for promotion and transfer
- Conditions of service
- Pay and benefits
- Conduct at work
- Disciplinary and grievance procedures
- Termination of employment, including dismissal, redundancy, and retirement
- Working hours, flexible working and time off

We seek to promote awareness and understanding of matters relating to equality, diversity, and inclusion through policies, training, guidance, and campaigns, both internally and with our external partners including clients, suppliers, and contractors.

We aim to create an inclusive working environment in which:

- The individual differences and diverse contributions of our employees are recognised by all as valuable to both our workplace culture and commercial success.
- Every individual feels welcomed, respected, supported and valued.
- All colleagues benefit from the right processes, policies, tools, and infrastructure to enable them to give their best.
- Everyone is treated with dignity and respect.

We will conduct ongoing assessments of our policies and practices to identify and eliminate any disadvantage or exclusion of persons with protected characteristics and ensure that our colleagues are empowered to discuss equality, diversity and inclusion issues and raise any related concerns.

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Recruitment

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act 2010), against objective criteria that avoids discrimination.

Vacancies should be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants should not be asked questions which might suggest an intention to discriminate or exclude on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

Disabilities

If you are disabled or become disabled and require reasonable adjustments, you can inform the Human Resources Department about your condition so that we can consider what reasonable adjustments or support may be appropriate.

We will make reasonable adjustments where possible to our standard working provisions, criteria or practices, or to physical features of the workplace, to ensure that a disabled employee is not placed at a substantial disadvantage in comparison with persons who are not disabled.

Part-time and fixed-term employees

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

Gender Reassignment


We recognise that any employee or worker may wish to change their gender during the course of their employment with the Company. Anderselite will support any employee or worker through the reassignment.

We will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

Where an employee is engaged in work where the gender change imposes genuine problems, we will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.

Any employee or worker suffering discrimination on the grounds of gender reassignment should have recourse to the Company's Disciplinary Procedure.

Recruitment of Ex-Offenders

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Where Anderselite has registered with the Disclosure and Barring Service (DBS) and has the authority to apply for a criminal record checks on an individual because they are working with children or vulnerable adults or both, we will comply with the DBS's Code of Practice which includes having a policy on the recruitment of ex-offenders.

Reporting and Breaches of this Policy

We commit to taking complaints of discrimination, harassment, and victimisation seriously by fellow colleagues, customers, suppliers, visitors, the public, and any others in the course of the organisation's work activities. Such acts will be viewed as misconduct, and appropriate action will be taken in line with the Disciplinary Procedure. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights and a criminal matter, such as in the case of sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

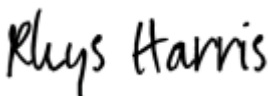
If you believe that you may have been discriminated against, you are encouraged to raise the matter through the Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter through the formal procedure under the Anti-Harassment and Bullying Policy. If you are uncertain which applies or need advice on how to proceed, please speak with a member of the HR department.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Colleagues who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

Should the HR department be made aware of a breach of this policy through channels other than formal notification, for example as a result of informal discussion or observation, action may still be taken in line with our formal procedures.

Every employee has an individual responsibility to help meet the requirements of this policy. All are invited to contribute ideas for better practices, through their Manager or directly to myself.



Rhys Harris
Operations Director

Date: 17th March 2023
Anderselite Ltd (part of The Morson Group)