

Diversity Equity and Inclusion (DEI) policy

Version control			
Version	Date	Author	Changes
1	04/01/2024	Claire Ratcliff	Initial draft
2	30/12/2026	Claire Ratcliff	Bi-annual review, signatures added

1 Our commitments

- 1.1 We are committed to promoting equal opportunities in employment and creating a workplace culture in which diversity and inclusion is valued and everyone is treated with dignity and respect. As part of our zero-tolerance approach to discrimination in any form, you and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**). We are also committed to providing equitable treatment to all those we deal with as an organisation, including customers and suppliers.
- 1.2 We will take all reasonable steps to:
- (a) Promote awareness and provide training to all staff and all managers on all aspects of equality and diversity in the workplace.
 - (b) Apply the principles of equity to all staff and all job applicants so that there is equality of opportunity. Our aim is that no individual is denied employment opportunities for reasons unrelated to ability.
 - (c) Implement all internal policies and procedures (on a fair and impartial basis).
 - (d) Create an inclusive working environment that is sensitive to the needs of staff of differing cultures, religions and beliefs. For example, in connection with festivals, religious observance and dress.
 - (e) Make reasonable adjustments to enable employees with disabilities to function effectively and to their full potential.
 - (f) Ensure that all work environments are free from all forms of discrimination, harassment, intimidation or bullying.

2 Introduction

- 2.1 The purpose of this policy is to set out our approach to diversity, equity and inclusion. Our aim is to encourage and support diversity, equity and inclusion and actively promote a culture that values difference and eliminates discrimination in our workplace. It applies to all aspects of employment with us, including recruitment, pay, benefits and conditions, flexible working and leave, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

- 2.2 This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

3 Status of this policy

This policy applies to all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

4 Who is responsible for this policy?

- 4.1 Our Directors have overall responsibility for the effective operation of this policy but have delegated day-to-day responsibility for overseeing its implementation to the Head of the HR Department. Questions about the policy or suggestions for change should be referred to the Head of the HR Department.
- 4.2 All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to diversity, equity and inclusion.
- 4.3 This policy is reviewed every two years by the Head of the HR Department.

5 Diversity and inclusion training

- 5.1 Managers will be given appropriate training on recognising and avoiding discrimination, harassment, victimisation, unconscious bias and promoting equality of opportunity and diversity in the areas of recruitment, development and promotion. The Head of the HR Department has overall responsibility for equality training for staff and managers, as appropriate.
- 5.2 We will provide you with regular training to ensure that everyone is aware of and understands the contents of this policy.

6 Discrimination

- 6.1 You must not unlawfully discriminate against or harass other people, including current and former staff, 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 or when wearing a work uniform), and on work-related trips or events including social events.
- 6.2 The following forms of discrimination are prohibited under this policy and are unlawful:
- (a) **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay. Direct discrimination can include associative discrimination, where a person is treated less favourably because of their association with an individual with a Protected Characteristic, and perception discrimination, where a person is treated less favourably because of the mistaken belief that they possess a Protected Characteristic.

- (b) **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- (c) **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- (d) **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.
- (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.

7 Recruitment and selection

- 7.1 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. Shortlisting and interviewing should be done by more than one person and with the involvement of the HR Department, where possible. Our recruitment procedures will be reviewed regularly to ensure that individuals are objectively assessed on the basis of their relevant merits and abilities.
- 7.2 Vacancies should generally be advertised to a diverse section of the labour market by using a variety of social media channels as well as using recruitment agencies which provide a diverse range of suitable candidates. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.
- 7.3 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 7.4 Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the HR Department. For example:
 - (a) Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
 - (b) Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
 - (c) Positive action to recruit disabled persons.

- (d) Equal opportunities monitoring (which will not form part of the selection or decision-making process).

7.5 Where necessary, job offers can be made conditional on a satisfactory medical check.

7.6 We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the HR Department or UK Visas and Immigration.

8 Training, promotion and conditions of service

8.1 Training needs will be identified through regular appraisals which will be based entirely on an objective assessment of performance and will not be influenced by any Protected Characteristics that you may have. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

8.2 Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all of you who should have access to them and that there are no unlawful obstacles to accessing them.

9 Monitoring

9.1 We will monitor the effectiveness of our policies and procedures in meeting our diversity, equity and inclusion objectives and to identify areas in which further resources or support are required to achieve equality of experience.

9.2 We will also monitor the treatment and outcomes of any complaints of discrimination, harassment or victimisation we receive to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

10 Termination of employment

10.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

10.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

11 Disabilities

11.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

11.2 If you experience difficulties at work because of your disability, you may wish to contact your line manager or the HR Department to discuss any reasonable adjustments that would help overcome or

minimise the difficulty. Your line manager or the HR Department 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.

12 Part-time and fixed-term work

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

13 Breaches of this policy

- 13.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination and victimisation may amount to gross misconduct resulting in dismissal.
- 13.2 If you believe that you have suffered harassment, bullying or discrimination, or witnessed it happening to someone else in the workplace, you can raise the matter through our Grievance Procedure. Complaints will be treated in confidence and investigated as appropriate.
- 13.3 There must be no victimisation or retaliation against staff who complain about or report discrimination. If you believe you have been victimised for making a complaint or report of discrimination, or have witnessed it happening to someone else in the workplace, you should raise this through our Grievance Procedure.
- 13.4 We encourage the reporting of all types of potential discrimination, as this assists us in ensuring that diversity, equity and inclusion principles are adhered to in the workplace. However, making a false allegation in bad faith, or that you know to be untrue, will be treated as misconduct and dealt with under our Disciplinary Procedure.

Signed	Print Name	Date
	Tom Glinka - Director	28/01/2026
	Claire Ratcliff – HR Manager	28/01/2026