1. **Application**

This policy applies to all of the S&G Response workforce, including employees, consultants and contractors. It also applies to conduct outside of the workplace that is related to work, such as meetings, social events and social interactions with colleagues that may impact the reputation of the business.

1. **Purpose and objectives**

The purpose of this policy is to outline how equality, diversity and inclusion is promoted across all aspects of company work, the areas of potential discrimination and to consider what is and is not acceptable or what must be considered within the internal processes. The policy defines how to identify, assist, protect and not discriminate against employees, contractors or others associated with the workplace due to potential or existing characteristics.

S&G Response recognise that a diverse and inclusive culture is an essential part of how the business is managed. The culture, values and Business Principles are fundamental to the future success of the business and key stakeholder relations.

Everyone is to be treated fairly and consistently and feels comfortable and able to give their best regardless of their background or preferences. People from different backgrounds can bring valuable insights and differences in opinions bring better outcomes for our customers and better decision-making and it is imperative to enhance the way everyone works successfully together. The aim is ultimately to deliver better customer service and outcomes for all. Any form of discrimination will not be tolerated.

This policy will also serve to raise awareness and understanding of the areas of equality diversity and inclusion, to ensure all of the workforce have the required tools to maintain the fair treatment of everyone at all times, regardless of their circumstances.

Any person who fails to comply with this policy and/or wilfully or negligently ignores the training and guidance provided, will potentially face disciplinary action in accordance with the Disciplinary Procedure.

1. **Key legislation/regulation**

The guidance provided within this policy and subsequent process and procedures is centred around the Equality and Diversity Act 2010 and the best practice guidance provided by ACAS. The Equality Act provides a legal framework to protect the rights of individuals and advance quality of opportunity for all.

Other areas of relevance, include:

* Data Protection Act (DPA) 2018
* General Data Protection Regulation (GDPR) 2016/679
* Equality and Diversity (Equality Act 2010)
1. **Policy and procedures**

**Definition**

The Equality Act 2010 is aimed to protect everyone form discrimination. Discrimination or unfair treatment on the basis of certain personal characteristics is against the law in almost all cases.

The S&G Response culture, values and Business Principles determine the expected behaviours of every person. There is an absolute commitment to creating an environment that promotes, equality, dignity and respect for all. Unfair or unlawful discrimination will not be tolerated, including harassment and bullying committed against any applicant, employee, visitor, contractor or other business partner due to a protected characteristic as defined under the Equality Act 2010. These include:

* Sex
* Sexual orientation
* Gender reassignment
* Age
* Pregnancy and maternity
* Marriage and civil partnership
* Disability
* Religion or belief
* Race (defined by race, colour, nationality, ethnic or national origin)

In addition, discrimination will not be tolerated based on the type of work pattern whether this be flexible working, part time working or working on a fixed term basis.

**Identification**

The following forms of discrimination are prohibited under this Policy and are unlawful:

1. **Direct discrimination:** This means treating someone less favourably than another because of a Protected Characteristic (see earlier examples). For example, rejecting a claim because of a customer’s religious views or sexuality. Other types of direct discrimination are:
	1. **Associative Discrimination** – this is direct discrimination against someone because they associate with another person who possess a protected characteristic. For example, an employee is discriminated against because his or her son/daughter is disabled.
	2. **Perceptive Discrimination** – this is direct discrimination against an individual because others think they possess a protected characteristic. For example, where a group of employees believe an individual is gay. This applies even if the individual does not actually possess that characteristic.
2. **Indirect discrimination:** This relates to a situation where 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, only communicating to customers via email. This could potentially be indirect discrimination against elderly customers, who might not have the digital knowledge to utilise email. Such a requirement would be discriminatory unless it can be justified.
3. **Harassment:** Harassment is defined as unwanted conduct related to a relevant protected characteristic which has the purpose of or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for that person or violating someone’s dignity. It is not the intention of the harasser but how the recipient perceives the behaviours which determines whether harassment has occurred. Further details are outlined in our Harassment and Bullying Policy.
4. **Victimisation:** Usually occurs where an individual is treated less favourably than others because they have asserted a legal right against an organisation. For example, retaliation against a customer who has complained, or has supported someone else's complaint about discrimination or harassment.

Every member of the workforce will have the required level of training and support required to understand the different methods of identifying and managing discrimination.

**Practical application**

No form of intimidation, bullying or harassment will be tolerated. If any person believes they have suffered discrimination because of any of the above protected characteristics, an informal discussion seeking resolution would be the first step via the line manager or another relevant senior person.

It is open to everyone to decide if it is more appropriate to raise the issue by using either the Grievance Procedure or through the Harassment Policy.

Everyone has a personal responsibility for the application of this policy and a duty to be familiar with this policy, in conjunction with the relevant training. Every person must comply with this policy and support promoting and advancing this policy through the expected behaviours.

Everyone should understand that they as well as S&G Response can be held liable for any acts of bullying, harassment, victimisation or unlawful discrimination in the course of their employment, whether this be against fellow employees, clients, suppliers, contractors or others connected to the business.

This policy is of particular relevance to directors, Managers and Team Leaders who are involved with or concerned with recruitment, selection, promotion and training procedures or employment decisions that may affect others. The following sets out some specific areas of application to be considered.

1. **Recruitment and Selection:** Recruitment and other selection exercises such as redundancy selection are conducted objectively and on merit to avoid any form of discrimination. Vacancies are advertised internally as well as externally to a diverse section of the labour market. Care is taken with any adverts to avoid stereotyping or the use of wording that may discourage particular groups from applying. During the recruitment process questions may be needed to determine whether an applicant can perform an important element of the role or whether suitable adjustments may be needed. All those involved in recruitment will undertake specific training beforehand including training covering how to avoid conscious and unconscious bias. It is a requirement to check that candidates who are offered roles are eligible to work in the UK. This is based on the production of original documentation prior to commencing the role.
2. **Promotion:** Selection for promotion is based on merit and the process ensures that any unjustifiable barriers to promotion are removed and that the process is not influenced by any protected characteristic in any way.
3. **Training:** Training needs are identified fairly during regular feedback and development discussions. Everyone is required to undergo training in relation to the principles of this policy and to undergo periodic updates to incorporate any changes, whilst also encouraging promotion of the principles contained within it.
4. **General Employment:** The terms and conditions of service, including benefits are reviewed regularly to ensure that they are available to everyone who should have access to them and that there are no unlawful obstacles to accessing them. In addition, the facilities, physical features and surroundings of the business premises are periodically reviewed and assessed to ensure they are accessible to all or to be able to meet any special needs.

If a person is disabled or becomes disabled, they should discuss the condition with their line manager so that their needs can be accommodated, as appropriate and within reason. If it is considered a particular adjustment would not be reasonable, there is a need to explain the reasons and try to find an alternative solution where possible.

Any complaints of bullying, harassment, victimisation or unlawful discrimination by a colleague, a customer, supplier or any others in the course of our work activities is taken seriously and may be dealt with under the Grievance and/or Disciplinary procedures with appropriate action taken which could, in a serious situation amount to gross misconduct and lead to dismissal.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated appropriately. However, if any allegations are found to be false or made in bad faith, these may be dealt with under the Disciplinary Policy. Everyone should be aware that an individual may be personally liable for acts of discrimination prohibited under this policy and some acts may be considered a criminal matter which could mean the individual can be sued by the victim. The Whistleblowing Policy is there to be used if the circumstances dictate this.

1. **Monitoring**

Monitoring is undertaken in a variety of methods. Logs are kept of any issues raised. This is supported via the analysis of diversity data, which is reported on a quarterly basis and provides an overview of the activity within the company.

The policy and procedures are monitored on a regular basis by the Policy Owner, the Compliance Team and Board and incorporated within the risk management framework, including on the Risk Register.

Any failings of this policy, any related policy or document and any processes, procedures or systems, will be assessed by the Owner of the policy and the Compliance Team, to ensure there are continuous learnings and improvements made to ensure S&G Response can continue to enhance the delivery of optimal outcomes for all key stakeholders.

1. **Reporting**

The Policy Owner is responsible for regularly reporting on the business-wide adherence with the policy and the effectiveness of the supporting control environment, to both the management community and to the Board.

1. **Training and awareness**

All of the workforce are introduced and trained on the Equality, Diversity and Inclusion Policy and supporting procedures during their induction programme and this policy forms part of the annual mandatory regulatory training for the existing workforce.

1. **Roles and Responsibilities**

Workforce - must at all times ensure that they read, understand and comply with this policy and raise concerns as soon as possible if they believe or suspect that a breach or conflict with this policy has occurred, or may occur in the future.

Policy Owner – must, with support from the Compliance Team, ensure this policy is continuously maintained and kept up to date with any relevant changes. For example, externally if there is a change in the legal or regulatory environment, or internally if there any changes for example to referenced/related documents or changes to key processes, procedures, training or roles and responsibilities. The Policy Owner is also responsible for regularly reporting on adherence with the policy and the supporting control environment.

Compliance Team – must support maintain this policy, with input from the Policy owner, as well as being responsible for maintaining all supporting relevant records.

Board – maintain oversight of this policy on a regular basis and ensure there is regular oversight.

1. **Referenced documents**
* Business Principles
* Risk Register
1. **Related policies**

Our related policies include:

* Bullying & Harassment Policy
* Grievance Policy
* Disciplinary Policy
* Whistleblowing Policy