

Equality, Diversity and Inclusion Policy

IDENTITY HOLDINGS LIMITED

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1. About this Policy

Identity is fully committed to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to the organisation.

The organisation will not discriminate because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. We will build a culture that values meritocracy, openness, fairness and transparency. We promote equality through our policies and initiatives.

This policy therefore sets out our approach to equality, diversity and inclusion (ED&I). It applies to 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 People and Culture Director is responsible for this policy and any necessary training.

This policy will be reviewed on an ongoing basis to reflect changes in the law, demographics and internal business requirements. Progress relating to the policy will be recorded annually and a full report will be presented to the Executive Team to debate progress and review the policy status.

Legislation that Applies: The Equality Act 2010

2. Statement of policy

The aim of this policy is to communicate the commitment of the Executive Team to the promotion of ED&I at Identity.

It is our policy to provide employment equality to all, irrespective of:

- i. age
- ii. disability
- iii. gender reassignment
- iv. marriage and civil partnership
- v. pregnancy and maternity
- vi. race; (including colour, nationality, ethnic or national origins, e.g. Irish Traveller)
- vii. religion, belief or political opinion
- viii. sex
- ix. sexual orientation.

These are collectively known as Protected Characteristics.

We are opposed to all forms of unlawful and unfair discrimination. All job applicants, employees and others who work for us will be treated fairly and will not be discriminated against on any of the

above grounds. Decisions about recruitment and selection, promotion, training or any other benefit will be made objectively and without unlawful discrimination.

The policy is applicable to all employees, agency staff, clients, communities, suppliers and contractors, whether permanent or temporary. All employees are responsible for the promotion and advancement of this policy. Behaviour, actions or words that transgress the policy will not be tolerated and will be dealt with in line with our disciplinary policy.

3. Equality, Diversity & Inclusion Commitments

We are committed to:

- i. Promoting equality of opportunity for everyone
- i. Promoting a good and harmonious working environment in which everyone is treated with respect
- ii. Preventing occurrences of direct and indirect discrimination, harassment and victimisation
- iii. Fulfilling all our legal obligations under equality legislation and associated codes of practice
- iv. Complying with our own ED&I policy and associated policies
- v. Taking lawful affirmative or positive action, where appropriate
- vi. Regarding all breaches of equal opportunities policy as misconduct which could lead to disciplinary proceedings.

This policy is fully supported by the Executive Team.

4. Implementation

The People & Culture Director has specific responsibility for the effective implementation of this policy.

Directors and managers also have responsibilities and we expect all our employees to abide by the policy and help create an environment where all can perform to their best.

In order to implement this policy, we shall:

- i. Communicate the policy to employees, job applicants and relevant others (such as contract or agency workers)
- ii. Incorporate specific and appropriate duties in respect of implementing this policy into everyone's job descriptions and work objectives.
- iii. Provide equality training and guidance as appropriate, including training on induction and management courses.
- iv. Ensure that those who are involved in assessing candidates for recruitment or promotion will be trained in non-discriminatory selection techniques.
- v. Incorporate ED&I notices into general communications practices (e.g. staff newsletters, intranet)

- vi. Obtain commitments from other persons or organisations such as subcontractors or agencies that they too will comply with the policy in their dealings with our organisation and our workforce
- vii. Monitor EDI data of both candidates (anonymously) and employees with objective of identifying trends and developing actions for improvement
- viii. Ensure that adequate resources are made available to fulfil the objectives of the policy.

5. Discrimination

The Company will not tolerate any kind of discrimination against or harassment of 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 or when wearing a work uniform), and on work-related trips or events including social events.

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

- i. **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or their sexual orientation.
- ii. **Indirect discrimination:** A provision, criterion or practice that applies to everyone but adversely affects people with a 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.
- iii. **Harassment:** This includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- iv. **Victimisation:** Retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- v. **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.

Our Anti Bullying & Harassment Policy and practises will be regularly reviewed and adopted.

6. Recruitment and Selection

Identity recognises the importance of diversity and we welcome the difference that a diverse culture brings; reflecting our clients, the market place and society as a whole. Our recruitment and selection processes reflect our belief in diversity and equality.

Identity's recruitment practices will be viewed as fair and professional to both existing employees and potential employees. The recruitment process will be geared to identifying the key skills, knowledge, competencies and attitudes required and will not in any way discriminate against potential employees/candidates on the grounds of their age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. Recruitment, promotion and other selection exercises such as redundancy selection will be conducted based on merit, against objective criteria that avoid discrimination.

- i. Vacancies will typically be advertised to a diverse section of the labour market. Advertisements will avoid stereotyping or using wording that may discourage particular groups from applying.
- ii. The Talent Acquisition Team will actively engage with local employment agencies and local unemployment programmes so that, as vacancies arise, local people are made aware of opportunities. They will also actively seek new ways to advertise vacancies that encourage applicants from disadvantaged groups.
- iii. Information such as age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation will not form part of the shortlisting process.
- iv. Prior to attending interview or completing tests, candidates will be asked if they have any special needs or adjustments that need to be made to enable them to complete the tests and perform at their best.
- ix. All those involved in recruiting on behalf of the Company, will be required to attend training on non-discriminatory selection techniques

More details of our EDI commitments when recruiting can be found in the Recruitment & Selection Policy.

7. Training and Awareness

We are committed to:

- i. regularly conducting a training needs analysis relating to the understanding and management of diversity.
- ii. regularly consulting key stakeholders on the organisational learning requirements with regards to ED&I.
- iii. integrating diversity into mainstream training and development programmes.
- iv. establishing educational programmes for all staff (including programmes that move from awareness to behavioural change).
- v. integrating diversity competencies into development programmes and assessment and selection processes.

8. Disabilities

The Company is committed to ensuring that those with disabilities are able to perform at their best and progress whilst working with Identity. Initiatives include:

- i. *Health Questionnaires*: Once an offer of employment has been accepted, candidates will be asked to complete a confidential health questionnaire via the Company's occupational health provider. The Company will only be advised of the future employee's fitness to perform the role they have been recruited for and any adjustments that may need to be made to enable them to perform their role.
- ii. *Ongoing Occupational Health Advice*: We will also ensure that advice is sought on any adjustments that should be made as/when we are made aware of employees' health conditions.
- iii. *Disability Confident*: We will work towards becoming a Disability Confident Employer.

9. Monitoring and Review

- i. We will establish appropriate information and monitoring systems to assist the effective implementation of our EDI policy.
- ii. The effectiveness of this policy will be reviewed annually in consultation with employees and action taken as necessary. For example, where monitoring identifies an under-representation of a particular group or groups, we shall develop an action plan to address the imbalance.
- iii. Recruitment policies and procedures will be reviewed at bi-annually to ensure that they do not discriminate or create unfair conditions or employment.
- iv. Salaries and rates of pay will be reviewed annually to ensure equality exists between men and women, particularly focussing on the areas of conditions of employment and rates of pay/salaries.
- v. All job applicants will be asked to complete a Diversity Monitoring Form. This data will be used to track the diversity of our applicant pool and enable us to establish successful methods of advertising.

10. Management & Stakeholders

To support the EDI policy, the Executive Team will:

- i. Set diversity objectives.
- ii. Identify a senior level champion for leading the diversity strategy (normally the People & Culture Director).
- iii. Support and drive the annual EDI educational programme .
- iv. Develop and cascade a diversity vision statement.

- v. Work closely with key stakeholders such as clients and suppliers to achieve the aims of this policy. The policy should be adjusted to match the values, aims and objectives of key stakeholders to ensure there is continual progress. A culture of sharing, learning and continuous improvement should be evident from the start of a contract with regular reviews.

11. Breaches of This Policy

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 may amount to gross misconduct resulting in dismissal.

12. Complaints

If you believe you suffered any form of discrimination, harassment or victimisation are entitled to raise the matter through the agreed procedures (see *Complaints Policy* or *Anti-Bullying and Harassment Policy*). A copy of these procedures are available from the People and Culture Team. Any complaint of discrimination will be dealt with seriously, promptly and confidentially.

In addition to our internal procedures, you have the right to pursue complaints of discrimination to an industrial tribunal or the Fair Employment Tribunal under the following anti-discrimination legislation:

- vii. Equality Act 2010
- viii. Human Rights Act 1998

13. Victimisation

Every effort will be made to ensure that employees who make complaints will not be victimised. Any complaint of victimisation will be dealt with seriously, promptly and confidentially. Victimisation will result in disciplinary action and may warrant dismissal.

14. False Allegations

Making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

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