

Equality & Diversity Policy

V1.1 22/02/24

PURPOSE AND SCOPE

The company is committed to being an equal opportunities and diverse employer. All matters related to employment with the company are decided on the basis of qualifications, merit and business need. The company will not tolerate discrimination on the basis of race, religion or belief, gender, sexual orientation, disability, marital or civil partnership status, gender reassignment, age or pregnancy and maternity, Trade Union membership, colour, ethnic or national origin or because they are a part time worker or a full-time employee.

This policy applies to all P2G Associates' colleagues (including or the purposes of this policy both employees and other workers such as agency staff and consultants), as well as visitors, clients, job applications, students and suppliers. It does not form part of a colleague's terms and conditions of employment and may be varied, withdrawn or replaced by the company at any time. The company reserves the right to depart from the policy in appropriate circumstances, in line with UK legislation and best practice guidelines.

The purpose of this policy is to set out the steps which the company takes, and which it requires its' colleagues to take, to prevent discrimination and to promote fair and unbiased behaviours.

PRINCIPLES

- The company aims to create a respectful and dignified environment for its' colleagues and associated workers. Any disrespectful behaviour that causes distress will be subject to disciplinary action.
- The company will not tolerate discrimination on the grounds of race, religion or belief, gender, sexual orientation, disability, marital or civil partnership status, gender reassignment, age or pregnancy and maternity, Trade Union membership, colour, ethnic or national origin or because they are a part time worker or a full-time colleague.
- Any colleague who is found to discriminate on any of the above grounds will be subject to disciplinary action according to the organisation's disciplinary procedure. In serious cases, such behaviour will be deemed to constitute gross misconduct.
- Any colleague may use the grievance procedure to complain about discriminatory conduct or victimisation. No individual will be penalised for raising such a grievance unless it is made from malice, in which case the disciplinary procedure may be invoked.

FORMS OF DISCRIMINATION

- **Direct Discrimination** - consists of treating a person less favourably on the grounds of age, disability, ethnic origin, gender, marital status, nationality, religious belief or sexual orientation, than others are or would be treated in the same or similar circumstances (for example, rejecting a job applicant on the grounds that, due to their race, they will not "fit in").
- **Indirect Discrimination** - consists of applying a requirement or condition that, although applied equally to all individuals, is such that a considerably smaller proportion of individuals of a particular group can comply with it and it cannot be shown to be justified on other grounds.

- **Associative Discrimination** - whereby someone experiences direct discrimination because they are associated with another person with a protected characteristic, even though they themselves do not hold that characteristic.
- **Perception Discrimination** - whereby direct discrimination occurs against an individual based on the perception that they have a particular protected characteristic even if they do not.
- **Harassment** - occurs when there is unwanted conduct, related to one of the protected characteristics that has the purpose or effect of either violating one's dignity or creating an intimidating, hostile, degrading, humiliating or an offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.
- **Third Party Harassment** - is when a colleague complains of harassment by a third party (customer or client) who is not an employee of the company.
- **Victimisation** - consists of giving a person less favourable treatment than others in the same circumstances because of;
 - their personal circumstances; or
 - it is suspected or known that they have brought proceedings under legislation relating to discrimination; or
 - they have given evidence or information relating to such proceedings; or
 - they have alleged that discrimination has occurred.

RESPONSIBILITY

- It is the responsibility of everyone to act in a way that upholds the equality and diversity policy, and to challenge or report non-compliance. All managers must be aware of the behaviours of their team and are responsible for ensuring that their team members act in a non-discriminatory manner.
- All managers and supervisors, particularly those, who are responsible for selecting training or allocating work must lead by example and ensure that no discrimination takes place, either directly or indirectly.

RECRUITMENT AND SELECTION

- The company will not use recruitment methods that exclude or disproportionately reduce the numbers of applicants of any of the groups mentioned within the principles section of this policy.
- Recruitment methods may vary according to the needs of the role and the required level of response, but predominantly the company will use national or local agencies, job boards and employee referral schemes.
- Job titles and job content will be presented without bias toward gender or race.
- All applications will be given equal consideration based on job specific criteria.
- All applicants for the same job will be subject to the same process and aptitude tests. Adjustments will be made if necessary for applicants to complete these.
- Only those qualifications and skills that are applicable to do the job will be used as criteria for selection. They may include educational and professional qualifications (or international

equivalents), necessary experience (as long as it does not exclude candidates of certain age groups), the ability to conduct business in reasonable English and physical abilities.

- All requirements for educational and professional qualifications will be valid and job-related, and overseas degrees and diplomas are deemed equivalent to the UK qualification.

TERMS OF APPOINTMENT

- Salaries will be reviewed annually to ensure that there is equal pay for equal work or work of equal value. Salary increases will be made on ability and value of the work to the company, and the same rules followed in all cases. The annual salary review under this policy will not always result in a salary increase - the purpose of this review is to ensure parity.

DURATION OF EMPLOYMENT

- It is the company's aim to comply with eliminating discrimination in the field of employment against disabled persons or persons who have had a disability.
- Where any existing colleague or job applicant has a disability, or would be at a substantial disadvantage in performing the relevant job because of the working arrangements or physical environment, the company will consider making reasonable adjustments to the working arrangements. Various factors, including practicality and costs, will be considered. Such adjustments might include:
 - Making reasonable adjustments to premises
 - Allocating some of the disabled person's duties to another person
 - Transferring the disabled employee to fill an existing vacancy
 - Altering the employee's working hours
 - Assigning the employee to a different place of work
 - Allowing absence during working hours for rehabilitation, assessment or treatment
 - Giving training
 - Acquiring or modifying equipment
 - Modifying instructions or reference manuals
 - Modifying procedures for testing or assessment
- Where reasonably practicable, such adjustments will be made. However, there may be circumstances where it would not be reasonably practicable to accommodate changes and where less favourable treatment may be justified in accordance with the statutory provisions.
- The company will ensure that persons in part-time employment are treated no less favourably than persons in full-time employment.

TRAINING AND DEVELOPMENT

- Training opportunities will be made available to all colleagues.
- Part time employees will have the same opportunities as full-time colleagues.
- Fixed Term colleagues will have the same opportunities as permanent colleagues.

- Assistance with further education may be provided to colleagues, where a course can be shown to be of benefit to the company as well as to the individual and within the training budget.
- Training courses and materials will be free from bias or prejudice.
- Performance appraisals will use objective criteria that are neither directly nor indirectly discriminatory.
- The company will have regular performance reviews and informal meetings to identify individuals that may be under-utilising their skills and qualifications, identify training needs and to develop their potential regardless of operating level.
- Selection of colleagues for promotion is based on ability and merit, and criteria such as total length of service, which may be indirectly discriminatory, will be avoided.

MONITORING

- For the purpose of equality and diversity monitoring, the company will maintain information relating to colleagues' age, disability, ethnic origin, gender and nationality. This information will be used solely for monitoring purposes and kept confidential and access to these records will be restricted.
- Recruitment records, including information on decisions in respect of short-listing and appointments, are kept in sufficient detail to enable the company to ensure that its' equality and diversity policy is being properly implemented in the area of recruitment.

TERMINATION OF EMPLOYMENT

- The company will monitor redundancy criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against colleagues
- The company will ensure that disciplinary procedures are carried out fairly and uniformly for all colleagues, whether they result in the giving of disciplinary warnings or some other sanction.

BREACHES OF THIS POLICY

- If a colleague believes that they have been discriminated against on any of the grounds given, they should raise the matter through the company's grievance policy.
- Should a colleague believe that they have been victimised or harassed on any of the above grounds, they are encouraged to raise the matter through the company's dignity at work policy.
- Colleagues who raise an issue under this policy in good faith will not be treated less favourably as a result. Any allegation which has been made in bad faith however will be dealt with under the company's disciplinary policy.
- Any colleague found to have been in breach of this policy will be dealt with under the disciplinary policy. In serious cases, such behaviour may amount to gross misconduct and lead to summary dismissal.