

## **EQUALITY AND DIVERSITY POLICY**

The Group is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants equally, promoting a culture which actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way the Group works.

### **Definitions of Equality and Diversity**

Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups both in employment and goods and services. This is supported and protected by legislation.

Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and invisible differences, and by respecting this everyone can feel valued for their contributions.

Equality and Diversity are not inter-changeable but inter-dependent. There can be no equality of opportunity if differences are not recognised and valued.

### **Policy Statement**

The Group aims to be an inclusive employer where diversity is valued, respected and built upon. The Group will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications in line with all protected characteristics as set out in the Equality Act 2010 and any other associated statute. The Group will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment.

All employees have a duty to co-operate with the Group to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination or harassment. Action will be taken under the Group's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this Equality and Diversity Policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable as well as, or instead of, the Group for any act of unlawful discrimination.

Employees should draw the attention of their line manager to suspected discriminatory acts or practices or suspected cases of harassment. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Group's disciplinary procedure.

### **Recruitment, Advertising and Selection**

All recruitment will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of experience, abilities and qualifications. The Group is committed to applying its equality and diversity policy statement at all stages of recruitment and selection.

Advertisements will encourage applications from all suitably qualified and experienced people regardless of their background. When advertising job vacancies, in order to attract applications from all sections of the community, the Group will, as far as reasonably practicable:

- Ensure advertisements are not confined to those publications which would exclude or disproportionately reduce the numbers of applicants of a particular gender, sexual orientation, religion or racial group;
- Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular gender, sexual orientation, religion or racial group or which would exclude disabled job applicants;
- Avoid prescribing any requirements as to marital status;
- Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees of any particular gender, sexual orientation, religion or racial group or from employees with a disability;

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, the Group will have regard to its duty to make reasonable adjustments to their application, interview and work arrangements or to work premises in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

### **Terms of Employment, Benefits, Facilities and Services**

All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful discrimination on the grounds of race, colour, ethnic origin, nationality, national origin, caste, religion or belief, sex, sexual orientation, marital status, age or disability.

### **Equal Pay**

The Group is committed to equal pay in employment. It believes its male and female employees should receive equal pay for like work rated as equivalent or work of equal value. In order to achieve this, the Group will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

### **Sexual Harassment**

It is against the Group's policy for any employee, male or female, to sexually harass another employee or to harass him or her on the grounds of actual or perceived sexual orientation. Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favours, engaging in other unwelcome verbal or physical conduct of a sexual nature, subjection to obscene or other suggestive comments, and sexual jokes or pictures.

### **Racial Harassment**

Racial harassment includes, but is not limited to, engaging in unwelcome verbal or physical conduct of a racial nature, subjection to racist comments, and racist jokes or pictures. Harassment may comprise intentional bullying which is obvious or violent but it can also be unintentional or subtle, such as the use of nicknames or teasing. It is for the complainant to decide for him or herself what they regard as offensive.

### **Reporting Complaints**

All allegations of discrimination or harassment will be dealt with seriously, confidentially and expediently. The Group will not ignore or treat lightly grievances or complaints of discrimination or harassment from members of a particular sex, sexual orientation, religion or racial group or from employees who are disabled.

With cases of harassment, while the Group encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Group also recognises that actual or perceived power and status disparities may make such confrontation impractical.

If you wish to make a complaint of discrimination or harassment, you should tell your line manager, (or a senior manager in the case of harassment by your line manager). You can also follow the formal Grievance procedure.

### **Monitoring Equal Opportunity and Dignity at Work**

The Group may, from time to time, monitor the effects of selection decisions, personnel diversity, pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices.

Craig Macklin



Franki Foundations UK Group Managing Director  
Dec 2020