



**Hargreaves**



Hargreaves Services plc and its  
Subsidiaries ('Hargreaves')

# EDI AND EQUAL OPPORTUNITIES POLICY

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**CLAUSE**

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## 1. **EQUAL OPPORTUNITIES STATEMENT**

The Company is committed to promoting equal opportunities in employment. 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**).

## 2. **ABOUT THIS POLICY**

2.1 The Company is committed to encouraging equality, diversity and inclusion amongst our workforce. This policy sets out the Company's approach to equal opportunities and the prevention of discrimination at work. The aim is for our workforce to be truly representative of all sections of society and for each employee to feel respected and able to give their best. It applies to all aspects of employment with the Company, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, leave for parents, requests for flexible working, disciplinary and grievance policies, and termination of employment (including redundancy).

2.2 This policy's purpose is to

- (a) Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time;
- (b) Not unlawfully discriminate because of the Protected Characteristics as set out in the Equality Act 2010; and
- (c) Prevent all forms of unlawful discrimination.

2.3 This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

2.4 This policy does not form part of any employee's contract of employment and it may be amended at any time.

2.5 All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote the Company's aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

2.6 All employees will:

- (a) Treat people in accordance with our Vision and Values;
- (b) Be aware of their responsibilities and, report inappropriate behaviour(s) and raise any incident(s) that breach this policy;

- (c) Familiarise themselves with this policy and procedure, ensuring that their practices are consistent with its contents and legislation; and
  - (d) Champion equality, diversity and inclusion in the workplace.
- 2.7 Human Resources will:
- (a) Ensure that this policy is updated following legislative changes;
  - (b) Request equality information on the Protected Characteristics from new starters;
  - (c) Ensure that all HR policy and procedures are equality assessed; and
  - (d) Actively take steps to promote diversity, equality and inclusion.
- 2.8 The Company will:
- (a) Encourage equality, diversity and inclusion in the workplace;
  - (b) Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and contributions are recognised and valued. This commitment includes training managers and employees on equality, diversity and inclusion;
  - (c) Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination in the course of the organisation's work activities. Such acts, if found to have occurred, will be dealt with as misconduct, and appropriate action will be taken in accordance with the Company's policies. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice;
  - (d) Make opportunities for training and development available to all staff, who will be helped and encouraged to develop their full potential so their talents and resources can be fully utilised to maximise the efficiency;
  - (e) Review employment practices and procedures when necessary to ensure fairness, and also update them and this policy to take account of changes in the law; and
  - (f) Monitor the make-up of the workforce regarding information related to Protected Characteristics in encouraging equality, diversity and inclusion.
- 2.9 If you have any questions about the content or application of this policy, you should contact the Human Resources Department to request training or further information.
- 2.10 Employees are invited to comment on this policy and suggest ways in which it might be improved by contacting the Human Resources Department.

### 3. DISCRIMINATION

3.1 You must not unlawfully discriminate against or harass 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.

3.2 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 can not be objectively 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 objectively 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. **Harassment is dealt with further in the Company's Positive Work Environment Policy.**
- (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.

### 4. RECRUITMENT AND SELECTION

4.1 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit and against objective criteria that

avoid discrimination. Shortlisting should be done by more than one person where possible. The Company's recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

- 4.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. They should include a short policy statement on equal opportunities and a copy of this policy will be made available on request.
- 4.3 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.
- 4.4 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 Company. 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).

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

- 4.5 The Company is 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 UK Visas and Immigration.
- 4.6 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in the Company organisation, the Company monitors applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps the Company take appropriate steps to avoid discrimination and improve equality and diversity.

## **5. TRAINING AND PROMOTION AND CONDITIONS OF SERVICE**

- 5.1 Training needs will be identified through regular appraisals. 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.
- 5.2 The Company's 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.

## **6. TERMINATION OF EMPLOYMENT**

- 6.1 The Company will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- 6.2 The Company will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

## **7. DISABILITIES**

- 7.1 If you are disabled or become disabled, the Company encourages you to tell it about your condition so that the Company can support you as appropriate.
- 7.2 If you experience difficulties at work because of your disability, you may wish to contact the Company to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The Company may wish to consult with you and your medical adviser about possible adjustments. The Company will consider the matter carefully and try to accommodate your needs within reason. If the Company considers a particular adjustment would not be reasonable it will explain its reasons and try to find an alternative solution where possible.
- 7.3 The Company will monitor the physical features of its premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, the Company will take reasonable steps to improve access.

## **8. PART-TIME AND FIXED-TERM WORK**

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

**9. BREACHES OF THIS POLICY**

- 9.1 The Company takes a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Policy. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal without notice.
- 9.2 If you believe that you have suffered discrimination you can raise the matter through the Company's Grievance Policy or through the Company's Positive Work Environment Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.
- 9.3 There must be no victimisation or retaliation against employees who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the Company's Disciplinary Policy.

**10. REVISION HISTORY**

| Revision History |          |   |
|------------------|----------|---|
| Date:            | Version: | Description:  |
| April 2021       | 1        | New Document  |
| January 2024     | 2        | Reviewed and updated policy. Amalgamation with EDI policy |