

The Group is committed to building an organisation that is inclusive and makes full use of the talents, skills, experience, and different cultural perspectives available in a multi-ethnic and diverse society, and where people feel they are respected and valued, and can achieve their full potential regardless of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability or age.

The Group will follow the recommendations and guidance of the Equality and Human Rights Commission, in all our employment policies, procedures and practices, and in dealing with customers and members of the public.

The aims of this policy are to ensure that:

- ✘ No-one receives less favourable treatment, on grounds of any protected characteristic (including age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex and sexual orientation); or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified on any other grounds.
- ✘ No-one is victimised for taking action against any form of discrimination or harassment, or instructed or put under pressure to discriminate against, or harass, someone on the above grounds.
- ✘ The organisation is free of unwanted conduct that violates the dignity of workers or creates an intimidating, hostile, degrading, offensive, humiliating or non-inclusive environment.
- ✘ Opportunities for employment, training and promotion are equally open to male and female candidates, candidates from all racial groups, candidates with or without disabilities, and candidates of any age, and of any sexual orientation, religion or belief.

Selection for employment, promotion, transfer, training, and access to benefits, facilities and services, will be fair and equitable, and based solely on merit.

This policy applies to all aspects of employment, from recruitment to dismissal and former workers' rights.

We will take the following steps to put the policy into practice and make sure that it is achieving its aims:

1. The policy will be a priority for the organisation.
2. Anthony Rimoldi, Group Chief Executive will be responsible for the day to day operation of the policy.
3. The policy will be communicated to all workers and job applicants, and will be placed on the company's intranet and website.

4. Workers and their representatives will be consulted regularly about the policy.
5. All workers will be trained on the policy, on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties. No-one will be in any doubt about what constitutes acceptable and unacceptable conduct in the organisation. Unacceptable conduct includes discrimination and harassment at work-related social functions.
6. Managers and workers in key decision-making areas will be trained on the discriminatory effects that provisions, practices, requirements, conditions, and criteria can have on some groups, and the importance of being able to justify decisions to apply them.
7. Complaints about discrimination or harassment in the course of employment will be regarded seriously, and may result in disciplinary sanctions, and even dismissal. The grievance procedure will be published in a form that is easily accessible.
8. Opportunities for employment, promotion, transfer and training will be advertised widely, internally and externally, and all applicants will be welcomed, irrespective of race, colour, nationality, ethnic or national origins, gender, sexual orientation, disability, age, religion or belief.
9. All workers will be encouraged to develop their skills and qualifications, and to take advantage of promotion and development opportunities in the organisation. All employees carrying out work of 'equal value' will receive equal pay, regardless of their sex, race or any other protected characteristic, and equal pay audits will be carried out as necessary.
10. Selection criteria will be entirely related to the job or training opportunity.
11. We will make reasonable changes to overcome physical and non-physical barriers that make it difficult for disabled employees to carry out their work, and for disabled customers to access our services.
12. We will take a flexible approach to working arrangements. We will consider requests for changes carefully and objectively, and will accommodate them unless it would cause significant difficulties to the business or employees.
13. Information on the ethnic and racial background, gender, disability, and age of each worker and applicant for employment will be collected and analysed, to monitor each stage of the recruitment process. The information will be held in strictest confidence and will only be used to promote equality of opportunity. Information about the religion/belief and sexual orientation of employees may also be monitored. Monitoring may include promotion and training if necessary.

14. If the data shows that people from particular groups are under-represented in particular areas of work, lawful positive action training and encouragement will be considered for workers and others from that group, to improve their chances of applying successfully for vacancies in these areas.
15. Grievances, disciplinary action, performance assessment, and terminations of employment, for whatever reason, may also be monitored by gender, racial group, age, disability, religion/belief and sexual orientation if necessary.
16. Requirements, conditions, provisions, criteria, and practices will be reviewed regularly, in the light of the monitoring results, and revised if they are found to, or might, unlawfully discriminate on any of the above grounds. We will also regularly review advertising, recruitment and application materials and processes, and this policy.
17. The effectiveness of the policy will be monitored regularly.
18. Customers and clients will be made aware of the policy via the website and of their right to fair and equal treatment, irrespective of race, colour, nationality, national or ethnic origins, sexual orientation, gender, religion/belief, disability or age.
19. Fair and equal treatment will be given to customers and members of the public by all staff. The business will investigate any complaints from staff that they are being harassed by a customer for reasons linked to protected characteristics and take suitable action to prevent further incidents.
20. The business will take all necessary steps to ensure that employees are legally entitled to work in the UK, making sure that employees from outside the EU have permission to work here by checking the validity of documents.

A P Rimoldi
Group Chief Executive
January 2020