

## Equality and Diversity Policy

### **Statement of Policy**

This Policy relates to equality and diversity and the Company responsibility in ensuring that our services promote equality of opportunity and eliminate discrimination.

The Directors have overall responsibility for ensuring that this Policy is implemented in accordance with the appropriate statutory requirements and full account will be taken of all available guidance and in particular any relevant Codes of Practice.

This Policy covers all aspects of equalities including the seven integrated strands of equality and diversity, namely, race, gender, disability, age, sexual orientation, transgender and religion or belief, and the characteristics detailed in the new Equality Act 2010.

We are committed to equality of opportunity in all aspects of our work. We do not tolerate any form of discrimination, either direct or indirect. Discrimination is unacceptable and breaches of the Policy will lead to disciplinary proceedings and, if appropriate, disciplinary action.

This Policy is set out into the below subsections:

1. Equality and Diversity – Internal Policies and Procedures
2. Community Relations, Equality and Diversity
3. Communication
4. Training and Awareness
5. Monitoring, Measurement, Feedback and Review

## **1. Equality and Diversity – Internal Policies and Procedures**

### **Recruitment and Selection**

We will endeavour, through appropriate training, to ensure that employees making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions. Additionally we will ensure the following actions to eliminate discrimination:

- Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this Policy;
- Job descriptions, will be in line with this Policy. Job requirements will be reflected accurately in any personnel specifications;
- We will adopt a consistent, non-discriminatory approach to the advertising of vacancies;
- We will not confine our recruitment to areas or media sources that provide only, or mainly, applicants of a particular group;
- All applicants who apply for jobs will receive fair treatment and will be considered solely on their ability to do the job;
- All employees involved in the recruitment process will periodically review their selection criteria to ensure that they are related to the job requirements and do not unlawfully discriminate;
- Short listing and interviewing will be carried out by more than one person where possible;
- Interview questions will be related to the requirements of the job and will not be of a discriminatory nature;
- We will not disqualify any applicant because he/she is unable to complete an application form unassisted unless personal completion of the form is a valid test of the standard of English required for the safe and effective performance of the job;
- Selection decisions will not be influenced by any perceived prejudices of other employees.

### **Training and Promotion**

Senior staff and Directors will receive training in the application of this Policy to ensure that they are aware of its contents and provisions and at all times are bound to comply with this Policy in the discharging of their duties. All training and promotion will be in line with this Policy.

### **Monitoring**

We will maintain and review the employment records of all employees in order to monitor the progress of this Policy.

Monitoring may involve:

- The collection and classification of information regarding the race, in terms of ethnic/national origin, the sex, age and disability, of all current employees;
- The examination by ethnic/national origin, sex, age and disability of the distribution of employees and the success rate of applicants;
- Recording recruitment, training and promotional records of all employees, the decisions reached and the reason for those decisions.

The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this Policy. Consideration will be given, if necessary, to adjusting this Policy to afford greater equality of opportunities to all applicants and employees.

### **Harassment**

The Gunitite Group does not tolerate any form of harassment or bullying.

Employees are made aware of the type of behaviour that is totally unacceptable as well as the solutions that are available to employees who may suffer harassment or bullying.

We aim to provide a neutral working environment in which no one feels threatened or intimidated.

Harassment is a discriminatory act and is also a criminal offence. It is very difficult to define as it can take many forms, but in the main it takes the form of unwanted behaviour by one employee towards another, for example:

- Comments about appearance/body/clothes;
- Leering or staring at a person's body;
- Unwelcome sexual invitations or pressure;
- Promises or threats, concerning employment or conditions, in exchange for sexual favours;
- Displaying offensive or sexually explicit material;
- Touching, caressing, hugging or indecent assault.

Bullying is also difficult to define. Obvious examples are:

- Threats of or actual physical violence;
- Unpleasant or over repeated jokes about a person;
- Unfair or impractical work loading.

### **Procedure for dealing with Complaints about harassment, bullying or discrimination**

It is recognised that complaints of harassment, bullying or discrimination are often of a sensitive or worrying nature and that it may be difficult to speak directly to the other employee involved. If this is the case, requests should be put in writing and handed to the harasser or bully.

When or if the informal approach fails or if the harassment, bullying or discrimination is of very serious nature employees must bring the matter to the attention of their Line Manager and HR. If possible, notes of harassment or bullying should be kept so that the formal complaint can be investigated, including the date, time and whereabouts of the act.

A formal complaint will be investigated thoroughly and during the investigation all possible actions will be taken to separate the alleged harasser or bully.

Those involved in the investigation will be informed of the findings of the investigation and will be given an opportunity to comment.

If the report concludes that the allegation is well founded, the harasser or bully will be subject to disciplinary action, in accordance with our Disciplinary Procedure.

If an employee brings a complaint of harassment or bullying they will not be victimised for having brought the complaint. If however after a full and fair investigation, we have grounds to believe that the complaint was brought with malicious intent, that employee will be subject to disciplinary action under our Disciplinary Procedure.

Our Appeal Procedure applies to appeals against decisions made under the Equality and Diversity Policy and the Harassment Policy.

## **2. Community Relations, Equality and Diversity**

Our Equality and Diversity Policy extends into the communities within which we work. It is our aim to provide training to all of our employees so that they can promote the equality of opportunity, eliminating unlawful discrimination and promoting community cohesion within our local communities.

We acknowledge and respect the fundamental human right of every person not to be discriminated against. Direct and / or indirect discrimination, harassment or victimisation will not be tolerated in the way services are delivered or functions and duties carried out.

We will work with understanding and without prejudice to any religion, race, disability or sexual orientation in accordance with our Equality and Diversity Policy.

Within the communities in which we work we will promote equality of opportunity and eliminate discrimination by:

- Maximising resident feedback in order to make improvements to the services delivered;
- Consulting and working collaboratively with community groups and representatives to ensure our services meet the diverse needs of the neighbourhoods in which we work;
- Ensuring that all communication and materials contain advice in the main community languages;

We will aim to make available sufficient and accessible supplies of our Customer Complaints Procedure and associated literature in a variety of formats and languages upon request.

In the unlikely event of a complaint we will ensure prompt and efficient resolution. We will treat all complaints on the grounds of equality, diversity and discrimination seriously and will take action where appropriate concerning all complaints of breaches of this Policy made by employees, Clients, or other third parties. We will deal with all complaints fairly, openly and without bias.

In accordance with our Customer Complaints Procedure, complainants can tell us about their complaint in the most convenient way to them either in person, in writing (letter, email, website, etc) and by telephone. We will aim to communicate and respond quickly and appropriately, in the style, language and format requested.

Our process for complaints is on the IMS Section 32 Non-Conformance and Corrective Preventative Action Process

### **3. Communication**

The Equality and Diversity Policy is communicated to employees, customers, suppliers, subcontractors, consultants, agency services and clients via a wide range of communication methods to help us meet diverse requirements.

We will ensure that our suppliers, including subcontractors, consultants and agency workers are aware of this Policy and will encourage them to have similar objectives. We will also request a copy of supplier policies for our records as part of our Subcontractor Evaluation Process.

We encourage a diverse range of suppliers as part of our Subcontractor Evaluation Process and Approved Supplier List alongside other business considerations.

#### **4. Training and Awareness**

The aim of equality and diversity training is to ensure that the Equality and Diversity Policy and any aims, issues and objectives are understood, supported and implemented by our employees. Training is designed to help Gunitite implement its Equality and Diversity Policy throughout the organisation at all levels.

Training will:

- Enable the implementation of the Equality and Diversity Policy;
- Address the way employees are supported in addressing the Equality and Diversity Policy and its objectives;
- Enable employees to improve their understanding of current equality and diversity guidance and in particular any relevant Codes of Practice;
- Act as a catalyst for change;
- Promote a culture that is based on commonly understood and agreed objectives that are seen as progressive and effective.

Equality and diversity training includes the following:

- Awareness and training sessions with Senior Management to establish Management commitment;
- Resource to coordinate successful implementation and relevant training;
- Presentations to all employees outlining the aims and objectives of the Policy;
- Circulation and communication of this Policy and any relevant guidance;
- Creation and circulation of supporting materials;
- Ensuring that induction training for all new employees involves communication of the Policy and relevant Procedures.

## 5. Monitoring, measurement, feedback and review

We are committed to monitoring the effectiveness of this Equality and Diversity Policy and the associated complaints procedure.

Performance with regards to this Policy will be measured on a regular basis and reported to the Board of Directors annually against targets in these areas.

Performance will be measured through:

- Employee, customer and client feedback;
- Individual consultation;
- Equality Impact Assessment;
- Ongoing assessment against agreed benchmarks and targets;

This Policy will also be reviewed where there are significant change to legislation, regulation or good practice, and where there are found to be deficiencies or failures in this Policy.

Signed:

A handwritten signature in black ink, appearing to be "M. Otter".

**Matthew Otter**  
**Managing Director**

3rd November 2021  
(next revision 3<sup>rd</sup> November 2022)