

| Policy Title: | Equality, Diversity and Inclusion Policy | | | | |
|----------------------------------|--|----------------------------|--|--|--|
| Policy Code: | HRP08 | | | | |
| Applies to: | Group Wide | | | | |
| Date Reviewed: | Septemb | September 2023 | | | |
| Next Update Due: | July 2025 | July 2025 | | | |
| Policy Lead: | Jo Sibson and Marie Leadbetter | | | | |
| Policy Sponsor: | Jayne Carter | | | | |
| | Employee Handbook | | | | |
| | HRP03 Code of conduct | | | | |
| | HRP10 Grievance Policy | | | | |
| | HRP05 Disciplinary Policy | | | | |
| | HRP24 | RP24 Whistleblowing Policy | | | |
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| Outcome: This policy aims to: | | | | | |
| outcome. | Outline Witherslack Group's commitment to ensuring all employees are treated equally and how this is monitored Highlight what someone needs to do should they feel they are not being treated in the line with the policy | | | | |
| EQUALITY AND DIVERSITY STATEMENT | | | | | |

Witherslack Group is committed to the fair treatment of all in line with the Equality Act 2010. An equality impact assessment has been completed on this policy to ensure that it can be implemented consistently regardless of any protected characteristics and all will be treated with dignity and respect.

ENVIRONMENT, SOCIAL, GOVERNANCE (ESG) STATEMENT

Witherslack Group is committed to responsible business practices in the areas of: Environmental Stewardship, Social Responsibility, Governance, Ethics & Compliance. An ESG impact assessment has been completed on this policy to ensure it can be implemented successfully without adverse implications on our Group goals.

To ensure that this policy is relevant and up to date, comments and suggestions for additions or amendments are sought from users of this document. To contribute towards the process of review, please email the named policy lead.

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1. INTRODUCTION

We are committed to equality of opportunity and to a pro-active and inclusive approach to equality, which supports and encourages all, promotes an inclusive culture, and values diversity. In order to express this commitment, we develop, promote and maintain policies that will be conducive to the principles of fairness and equality in the workplace. 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.

The objective of this policy is that no person in our employment, whether temporary, part-time or full-time, should suffer or experience less favourable treatment, discrimination or lack of opportunities on the grounds of age, disability, gender (including gender reassignment), marriage and civil partnership, pregnancy and maternity, race - including colour, nationality, ethnicity or national origin, sex, sexual orientation, religion or belief in line with the Equality Act 2010. We oppose and avoid all forms of unlawful discrimination, including pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

We are therefore committed to a policy and practice which require that all employees and potential employees are treated equally. Career progression will be determined by personal merit, by performance and by the application of criteria which are related to the duties and conditions of each particular post and the needs of the establishment.

If any employee considers that they are suffering from unequal treatment on any of the above grounds in their appointment or progression through the company, they may make a complaint, which will be dealt with through our grievance procedure.

2. OUR RESPONSIBILITY

As part of maintaining a high quality workplace, we commit to:

- Ensuring that people who are in our employment are protected from direct discrimination on the basis of a 'protected characteristic'. The relevant characteristics are:
 - o disability
 - o age
 - o gender reassignment
 - o pregnancy and maternity leave
 - o race this includes ethnic or national origins, colour and nationality
 - o religion, belief or lack of religion/belief
 - o sex
 - sexual orientation
 - marriage and civil partnership

Except in the case of pregnancy and maternity, people who are protected do not actually have to possess the characteristic themselves. Protection also applies, for example, where the person is unfairly treated because they are wrongly perceived to have a particular characteristic (or are treated as though they had it) or because they associate with someone who has the characteristic.

- Promote equality of opportunity, diversity and inclusion in the workplace.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where there are individual differences, the contributions of all employees are recognised and valued.

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- This commitment includes training managers and all other employees about their rights and
 responsibilities under the equality, diversity and inclusion policy. Managers responsibilities
 include supporting Witherslack Group to provide equal opportunities in employment, and
 prevent bullying, harassment, victimisation and unlawful discrimination in their teams.
- All employees should understand they, as well as Witherslack Group as their employer, can be
 held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the
 course of their employment, against fellow employees, customers, suppliers and the public.
- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's activities. Such acts will be dealt with as misconduct under our grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 which is not limited to circumstances where harassment relates to a protected characteristic, is a criminal offence.
- Make opportunities for training, development and progress available to all employees, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Decisions concerning employees being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- Monitor composition of the workforce regarding information such as age, sex, ethnic
 background, sexual orientation, religion or belief, and disability in encouraging equality, diversity
 and inclusion, and in meeting the aims and commitments set out in the equality, diversity and
 inclusion policy.
- Monitoring will also include assessing how the equality, diversity and inclusion policy, and any
 supporting action plan, are working in practice, reviewing them annually, and considering and
 taking action to address any issues.
- Take positive action wherever possible to support this policy and its aims.
- Create a culture that recognises, respects, values and harnesses differences for the benefit of the company and its users.
- Ensure that new employees are made familiar with this policy and our commitment to Diversity and Inclusion upon recruitment/onboarding.
- Ensure all employees complete Equality and Diversity Training on Learning Hub.
- Have in place suitable employee recruitment procedures that promote equal opportunities and ensure that employees have equal access to professional development opportunities; ensure

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that there is no discrimination against employees or eligible applicants for posts on the grounds of a protected characteristic.

3. REFERENCES

Equality Act 2010
Protection from Harassment Act 1997

4. ASSOCIATED FORMS

None

5. APPENDICES

None

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