

# Diversity, Equity and Inclusion Policy

<b>Owner</b>	<b>Leaders Romans Group Ltd</b>
<b>Version</b>	<b>1.0</b>
<b>Audience</b>	<b>All staff</b>

## Introduction

The Leaders Romans Group (LRG) (The Group) is committed to encouraging diversity, equity and inclusion among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

The organisation in providing services is also committed against unlawful discrimination of customers or the public.

## Scope

This policy applies to all permanent and temporary employees working for all companies and departments within LRG.

## Our Policy's Purpose

This policy's purpose is to:

1. Provide equality, fairness, respect and dignity for all in our employment, whether temporary, part-time or full-time.
2. Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of:
  - age
  - disability both mental and physical (including mental health problems and neurodiversity)
  - gender reassignment
  - marriage or civil partnership
  - pregnancy and maternity
  - race (including colour, nationality, and ethnic or national origin)
  - religion or belief
  - sex
  - sexual orientation (including all members of the LGBTQ+ community)
3. Oppose and avoid all forms of unlawful discrimination. This includes:
  - recruitment
  - pay and benefits

- terms and conditions of employment
- dealing with grievances and discipline
- dismissal
- redundancy
- leave for parents and carers
- requests for flexible working
- selection for employment, promotion, training or other development opportunities

## Our Values In relation to DE&I

### Passion

We are passionate about people, how they feel and their confidence to be their whole selves at work. We are passionate about recognising and valuing difference and appreciating all of our people.

### Respect

We respect the array of difference within the human experience, we want to understand and embrace the value this brings to our business and the people we serve.

### Integrity

Our commitment to embracing and embedding our intentions in relation to diversity, equity and inclusion are based on the knowing that it is the right thing to do for our business and for our people.

### Bravery

We recognise that this journey will sometimes be a challenging one, we will need to be courageous and allow space for vulnerability. Giving ourselves permission to not always get it right as we learn and grown. As we gather the knowledge and language to be actively inclusive.

## Our Commitment

### The organisation commits to:

1. Encourage diversity, equity and inclusion in the workplace as we recognise both the human and competitive advantage.
2. Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training managers and all other employees about their rights and responsibilities under the diversity, equity and inclusion policy.

All staff should understand they, as well 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.

3. 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 work activities.

Such acts will be dealt with as misconduct under the organisation's grievance or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and may 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.

4. Make opportunities for training, development and progress 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 of the organisation.

5. Make decisions concerning staff based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).

6. 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.

7. Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging diversity, equity and inclusion, and in meeting the aims and commitments set out in the diversity, equity and inclusion policy.

Monitoring will also include assessing how the diversity, equity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

8. Take all reasonable steps to recruit and employ employees on the basis of ability, skill and qualification, without regard to any of the grounds referred to above. No recruitment literature or advertisements will imply a preference for any one group of applicants unless there is a genuine occupational requirement (GOR) which limits the post to a particular group, in which case this must be clearly stated. Where a particular qualification is required, the Group will (as far as reasonably practicable) state that a fully comparable qualification obtained overseas is as acceptable as a UK qualification.

The Group will avoid making any requirements when recruiting employees which would exclude a higher proportion of a particular sex or racial group. The Company also recognises its legal duty to make reasonable adjustments where necessary.

## **Equality of Opportunity**

We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance.

The Group considers all forms of discrimination to be unacceptable in the workplace. We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in the Group as it seeks to develop the skills and abilities of its people.

While specific responsibility for eliminating discrimination and providing equality of opportunity lies with leaders and managers, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of every employee to this policy and application of its principles are essential to eliminate discrimination and provide equality throughout the Group.

All employees, workers or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Company.

### **Types of Discrimination**

Discrimination can be either direct or indirect discrimination. Discrimination against the protected characteristics listed in the Equality Act 2010 is prohibited, unless there is a legal exception under the Equality Act. These protected characteristics are race, religion or belief, sex, age, marital status, disability, pregnancy or maternity, gender reassignment and sexual orientation.

Direct discrimination: occurs where someone is treated less favourably on discriminatory grounds in relation to their employment. Direct discrimination may occur even when unintentional.

Indirect discrimination: occurs when a provision, criteria or practice is applied equally to all groups but has a disproportionate adverse effect on one sector of society more than others.

## **Anti-Harassment, Victimisation and Bullying**

We recognise that harassment and victimisation is unlawful under the Equality Act 2010. As such, harassment or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable and will not be tolerated.

Personal harassment takes many forms ranging from tasteless jokes and abusive remarks to pestering for sexual favours, threatening behaviour and actual physical abuse. For the purposes of this policy, it also includes bullying.

Bullying is understood to be targeted and persistent offensive, intimidating, malicious or insulting behaviour and can include the abuse or misuse of power to undermine, humiliate, denigrate or injure the recipient.

Whatever form it takes, personal harassment is always taken seriously and is unacceptable. We recognise that personal harassment can exist in the workplace, as well as outside, and that this can seriously affect employees' working lives by interfering with their job performance or by creating a stressful, intimidating and unpleasant working environment.

We deplore all forms of personal harassment and seek to ensure that the working environment is sympathetic to all our employees. The aim of this policy is to inform employees of the type of behaviour that is unacceptable and provide employees who are the victims of personal harassment with a means of redress.

### **Examples of personal harassment**

Personal harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Personal harassment is unwanted behaviour by one employee towards another and examples of harassment include:

- insensitive jokes and pranks
- lewd or abusive comments
- deliberate exclusion from conversations
- displaying abusive or offensive writing or material, including cyber bullying
- abusive, threatening or insulting words or behaviour

- name-calling
- picking on someone or setting them up to fail
- exclusion or victimisation
- undermining their contribution/position
- demanding a greater work output than is reasonably feasible
- blocking promotion or other development/advancement.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees committing any form of personal harassment.

### **Examples of sexual harassment**

Sexual harassment can take place in many forms within the workplace and can go undetected for a period of time where employees do not understand that particular behaviour is classed as sexual harassment. Sexual harassment is unwanted behaviour related to sex, or of a sexual nature, by one employee towards another and examples of sexual harassment include:

- lewd or abusive comments of a sexual nature such as regarding an individual's appearance or body
- unwelcome touching of a sexual nature
- displaying sexually suggestive or sexually offensive writing or material
- asking questions of a sexual nature
- sexual propositions or advances, whether made in writing or verbally.

Sexual harassment can also take place where an employee is treated less favourably because they have rejected, or submitted to, the unwanted conduct that is related to sex or is of a sexual nature. Whether less favourable treatment occurs as a result will be examined broadly and includes areas such as blocking promotion and refusal of training opportunities or other development opportunities.

### **Examples of victimisation**

Victimisation takes place when an employee is treated unfavourably as a direct result of raising a genuine complaint of discrimination or harassment. Furthermore, any employee who supports or assists another employee to raise a complaint is also subjected to victimisation if they are treated unfavourably.

### **Third party harassment**

The Company operates a zero tolerance policy in relation to harassment perpetrated against one of its employees by a third party, such as a client/customer or visitor to the organisation. All employees are encouraged to report any and all instances of harassment that involve a third party in line with our reporting procedure, as outlined below.

## **Complaining about Discrimination, Harassment, Victimisation and Bullying**

### **Informal resolution**

You are initially encouraged to resolve any situation informally. This should be done by talking directly, politely and unambiguously to the person concerned. It may be sufficient to explain clearly to the person the impact of their behaviour and to ask that it stop.

Should you not be able to resolve the matter informally or if you feel the circumstances are such that it is too difficult or uncomfortable, or negatively impactful on your own wellbeing you should follow the formal reporting procedure.

### **Formal resolution**

Where the informal approach fails or an informal approach is not appropriate due to the seriousness or impact of the situation, we encourage employees to address this through the Company's Grievance Policy.

Confidentiality will be maintained as far as possible and the investigation will be handled with all due respect for the rights of both the complainant and the alleged offender. Every effort will be made to resolve the complaint quickly. Any malicious complaints may result in disciplinary action against the complainant. The importance of confidentiality will be stressed to all those interviewed and everyone will be strictly required not to discuss the complaint with colleagues or friends. Breach of confidentiality may give rise to disciplinary action.

Following a thorough investigation it will be decided whether or not the complaint is upheld. If it is, then a disciplinary hearing will take place and appropriate action taken. The Group will seek to ensure that the complainant is not in any way penalised whether directly or indirectly for bringing a complaint in good faith and the situation will be monitored to ensure that the harassment has stopped.

Even where a complaint is not upheld, for example where the evidence is inconclusive, reasonable consideration will be given where possible to making arrangements which will prevent the parties from having contact at work, but this may not be possible for practical reasons. The complainant has the right to make a written appeal against any decision made.

## Responsibilities

### Employee responsibilities

The Group requires its employees to behave appropriately, professionally and respectfully at all times during the working day and during events outside of working hours which are classed as work-related (such as social events). Employees should not engage in discriminatory, harassing or aggressive behaviour towards any other person at any time which includes future/current/past colleagues or customers of the business. A breach of this policy will be treated as a disciplinary matter.

### Employer responsibilities

The Group will be responsible for ensuring all members of staff understand the rules and policies relating to the prevention of discrimination, harassing, victimising and bullying behaviour at work and during work-related social events. Where an incident is witnessed or a complaint is made under this policy, the Group will take prompt action to address the matter. All incidents will be deemed as serious and dealt with in a sensitive and confidential manner.

<b>Effective from date</b>	<b>October 2024</b>
<b>Review date</b>	<b>October 2025</b>

### Approved by

<b>Position</b>	<b>Name</b>	<b>Date</b>
<b>Chief Executive Officer</b>	<b>Mike Cook</b>	<b>October 24</b>
<b>Chief Operating Officer</b>	<b>David Wilson</b>	<b>October 24</b>
<b>Group HR Director</b>	<b>Hannah Cooper</b>	<b>October 24</b>