

APPENDIX 17



EQUALITY, DIVERSITY AND INCLUSION POLICY

We are committed to creating a culture that respects and values each other's differences, that promotes dignity, equality and diversity and that encourages individuals to develop. This policy commits us to treating all employees, potential employees, customers, suppliers and all other stakeholders fairly and equally regardless of their sex, sexual orientation, trans-gender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/ belief, age, disability, union membership status or political belief.

We will ensure that no requirement or condition will be imposed without justification that could disadvantage individuals purely on any of the above grounds.

Our policy takes into consideration the relevant legal standards. We aim to abide by and promote equality legislation by following the letter and the spirit of it in this area.

Our policy applies to the recruitment and selection of staff, terms and conditions of employment including pay, promotion, training, transfer and every other aspect of employment.

Iceni Projects is committed to the implementation of this policy and to a programme of action to ensure that the policy is, and continues to be, fully effective. All staff are required to comply with the policy and to act in accordance with its objectives so as to remove any barriers to equal opportunity. Any act of discrimination by employees or any failure to comply with the terms of the policy will result in disciplinary action.

Equal opportunity is about good employment practices and efficient use of our most valuable asset, our employees. Every Line Manager and employee has personal responsibility for the implementation of the policy. Any instance of doubt about the application of the policy, or other questions, should be addressed to the HR Department, as should any requests for special training.

Iceni Projects is committed to:

- Continue to promote an environment in which individual differences and the contributions of all our employees are recognised and valued;
- Ensuring that there is no discrimination in our recruitment, selection, performance management and other processes such as training and development, career progressions, pay etc;
- Ensure that every employee has a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated. Employees experiencing

any form of intimidation, bullying or harassment or any other form of discrimination should submit a grievance to their Line Manager;

- Ensure that breaches of our Equality, Diversity and Inclusion Policy will be regarded as misconduct and could lead to disciplinary proceedings
- Review all our employment practices and procedures to ensure fairness;

LEGISLATION

Iceni Projects operates in the United Kingdom, with multiple offices across the country (currently London, Manchester, Glasgow and Edinburgh). Working effectively with diversity is an essential part of this.

The key law which informs our approach is the Great Britain Equality Act 2010, has widened the scope of discrimination law beyond the areas of employment and into the provision and training in the broadest sense and the wider supply of goods and services. The Equality Act 2010 has harmonised and brought together many previous pieces of legislation:

- the Equal Pay Act 1970
- the Sex Discrimination Act 1975
- the Race Relations Act 1976
- the Disability Discrimination Act 1995
- the Employment Equality (Religion or Belief) Regulations 2003
- the Employment Equality (Sexual Orientation) Regulations 2003
- the Employment Equality (Age) Regulations 2006
- the Equality Act 2006, Part 2
- the Equality Act (Sexual Orientation) Regulations 2007

4.7.3 In addition to the Equality Act 2010, the policy has also been created in line with the codes of practices issued by:

- The Commission for Racial Equality
- The Equal Opportunities Commission
- The Disability Rights Commission

Discrimination does not necessarily occur as a result of a conscious decision. There are subtle and unconscious ways of unjustifiably discriminating. These can arise from making general assumptions about the capabilities, characteristics and interests of a particular group and from applying requirements, conditions or criteria without considering whether they advantage or disadvantage particular groups. We therefore need to take care to avoid all forms of unjustified discrimination and requirements, conditions or criteria. We should be alert to micro-inequities which are cumulative, sometimes subtle behaviours that result in discrimination, exclusion, demotivation and alert to unconscious bias.

We do not discriminate against staff on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex or sexual orientation (Protected Characteristics).

You and any job applicants will receive equal treatment regardless of any Protected Characteristics.

The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat 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, and on work-related trips or events including social events).

All staff have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against, harass or victimise other members of staff, regardless of their status.

Forms of discrimination

Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant because of their race because they would not "fit in" would be direct discrimination.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.

Stereotypes have the potential to lead to unjustified discrimination and so should be carefully examined and if necessary, challenged. Stereotypical and potentially offensive language and terminology should be avoided.

Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that 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 our Anti-harassment and Bullying Policy.

Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

Disability discrimination is prohibited. This includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability/discrimination arising because of disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Recruitment and Selection

We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Our recruitment procedures are reviewed regularly to ensure that individuals are recruited on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate.

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

Job advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. All our job placements will reflect our commitment to equality through the following indicative statements:

“Iceni Projects is committed to equality, diversity and inclusion.”

“We welcome applications from all sections of the community.”

“We guarantee an interview to disabled candidates who meet the essential criteria.”

We take steps to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our organisation.

We recognise that the interview is the stage of the process at which the recruiter is most vulnerable to his/her own subjectivity. Interviews should always be confirmed in writing or the preferred format for a visually impaired applicant. Under provisions in the current legislation, the Company has a duty to make reasonable adjustments at interview for a disabled candidate such as:

- ensure all its offices have access for wheelchair users; or
- allowing the candidate to be accompanied by a signer or interpreter.

All candidates will be asked prior to their interview if they have any special requirements in order for them to not be disadvantaged at the interview stage.

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 Human Resources approval. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the decision-making process).

Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of Human Resources (who should first consider whether such matters are relevant and may lawfully be taken into account).

The selection criteria described within the job specification and person specification are designed so that;

- only relevant competencies are measured and only at the relevant level; and
- candidates that are equally able to do the job are equally able to meet the assessment criteria regardless of sex, sexual orientation, trans-gender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/ belief, age, disability, union membership status or political belief.

We are 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.

Disability discrimination

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your Line Manager or Human Resources to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your Line Manager/the HR Department may wish to consult with you and your medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where necessary, we will take steps to improve access.

Fixed-term employees

We monitor our use of fixed-term employees, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

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

Part-time work

We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities.

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

Performance Management

The policy applies to performance management, succession planning and development opportunities. All staff should be encouraged to consider how equality, diversity and inclusion can add value to their work and have a related deliverable and/or development objective.

Evaluation, reporting and moderation of performance should be based solely on evidence, not on stereotypes or assumptions about staff, such as women's mobility or length of future service, or the suitability of staff of particular ethnic origins to undertake specific jobs. Unconscious bias should be guarded against.

Training

The selection criteria used for access to training should not discriminate unlawfully either directly or indirectly. Icen Projects has formulated a consistent approach to occupational training. We promote a fair and consistent training plan obtained through the personal development and appraisal system. As part of this process an individual's needs are assessed against the following criteria:

- requirement for the individual's current job;
- requirement for a job to which the candidate is to be promoted;
- legal or best practice requirements; and
- personal development.

Promotions and Transfer

We ensure that the criteria used by Icen Projects to contribute to the decisions for promotion or transfer must be objective, free from bias, justifiable and must not discriminate unlawfully either directly or indirectly.

DIVERSITY

Iceni Projects does not have separate policies to cover different areas of diversity. It has a primary but not exclusive focus on six grounds which are referred to in brief below.

Age: we believe it is positive to have a workforce of different generations and ages and to encourage the contributions of children, young people and adults of different ages, across the range of our work. In the UK there is no default retirement age. This contributes to ensuring ageing does not lead to reduced opportunities and supports us to employ colleagues regardless of their age. This promotes inclusion and the learning that comes from working with people of different ages.

Disability: we are committed to addressing unjustified discrimination against disabled people and to promoting the inclusion of disabled people in public life. We recognise disability as a broad concept that includes physical, cognitive and mental health issues and long-standing and fluctuating health conditions. We acknowledge that people are often not disabled through their own individual impairments or relative ability, but through common social attitudes and physical and attitudinal barriers which result in marginalisation and lack of access to full human rights. We aspire to address this by consciously identifying and removing such barriers, making reasonable adjustments and promoting the social model of disability. Our Promoting Inclusion: Disability Equality Guide is a resource for all our staff that supports this.

Gender: We are committed to tackling gender discrimination. Our focus is on promoting equality and eradicating unjustified discrimination in relation to women and girls who worldwide frequently experience social and economic disadvantage, negative attitudes, alienation, abuse and violence. We recognise that people are subjected to discrimination based on their gender reassignment, or perceived gender reassignment, or because they are transgender, intersex or hold another gender identity which may include gender fluidity. We aim to offer appropriate support, within the workplace and in the course of our activities to enable everyone to be recognised as they wish.

Race, Ethnicity and Culture: We recognise that racial discrimination is a complex phenomenon which can be based on grounds of race, nationality, religion, culture and/or colour and other physical markers linked to ethnic belonging. We believe that our work is enriched by the different ethnic/racial, cultural groups and travelling communities we engage with and that cultural relations has an important role to play in mutual understanding and exchange. We recognise however that conflict based on ethnic, cultural and other factors, including asylum seeker and refugee status, continues to exist and undermines inclusion. We require all staff, clients and suppliers to ensure no unjustified discrimination on grounds of race/ethnicity occurs and to promote positive and equitable relations between different races/ethnicities and cultures. We have a Race Equality Guide to help ensure this.

Religion and Belief: We value and respect the religions/beliefs held by staff and external contacts working in and with Iceni Projects and in the communities in which we operate, including those of no religion or belief. We try to ensure that needs and preferences are met. Where there are existing work requirements which may conflict with particular cultural and religious needs, we carefully consider whether it is reasonably practical to vary or adapt these to enable needs to be met. Requests for the accumulation of annual leave or unpaid leave in order to undertake pilgrimage, or to take unpaid leave

or exchange public holidays for other Holy Days of Obligation such as Eid, Yom Kippur, Diwali or Guru Nanak require constructive consideration. Our Religion and Belief Guide acts as a resource to support our understanding and to promote related good practice. We hold that increasing religious literacy will contribute to improved cultural relations.

Sexual Orientation: We are committed to supporting lesbian, gay, bisexual and heterosexual people to feel included and valued. We believe all colleagues have the right to be themselves at work without having to be concerned about sharing aspects of who they are. Whilst we respect the right of individuals to be open, or otherwise, about their sexual identity we recognise that sexual minorities can face especial challenges and be fearful of doing so in the workplace and beyond due to homophobia and heterosexism, as well as persecution. We are committed to tackling discrimination and harassment against lesbian, gay, bisexual staff and to supporting their inclusion. We support everyone working with, or for Iceni Projects to understand that negative messages or stereotypes on the basis of actual or perceived sexual orientation are unacceptable and inconsistent with our commitment to equality, diversity and inclusion. We are aware that some laws and cultures are particularly hostile towards lesbian, gay and bisexual people and we seek to offer a supportive environment to all colleagues and customers regardless of their sexual identity.

EQUALITY AND PAY

We have a commitment to a pay system that is transparent and based on objective criteria. Equal pay, free from gender or other unjustified bias, for the same or broadly similar work (that is, for work that rates as equivalent and for work of equal value), operates within Iceni Projects and we remain committed to regular equal pay reviews.

We are also committed to transparency and fairness in the allocation of bonuses and other allowances

BREACHES OF THE POLICY

If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Anti-harassment and Bullying Policy. If you are uncertain which applies or need advice on how to proceed you should speak to your Line Manager or the HR Department.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure.

There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.