

TRIAD GROUP PLC

EQUAL OPPORTUNITIES, DIVERSITY & DISABILITY POLICY

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1. STATEMENT OF INTENT

Triad Group Plc (“the Company”) recognises that it is unlawful to discriminate directly or indirectly. It is the aim of the Company to ensure that no Employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, background, race, religion and belief, sex, or sexual orientation (the “**protected characteristics**”).

Our aim is that our workforce will be truly representative of all sections of society and each Employee feels respected and able to give their best.

We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all in our employment.

All Employees, 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 organisation.

Our Employees will not discriminate directly or indirectly any candidates or applicants because of age, disability, gender reassignment, pregnancy and maternity, ethnicity, background, religion or belief, sex and sexual orientation in the provision of the Company’s goods and services.

This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies.

The Company is committed to:

- Promoting equality of opportunity for all.
- Creating an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Preventing occurrence of unlawful direct discrimination, indirect discrimination, harassment and victimisation.
- Fulfilling all our legal obligations under the equality legislation and associated codes of practice.
- Complying with our own equal opportunities policy and associated policies.
- Reviewing all our employment practices and procedures to ensure fairness.
- Training, development and progression for all staff.
- Dealing with breaches of our equality policy which will be regarded as misconduct and could lead to disciplinary proceedings.

2. RESPONSIBILITIES OF MANAGEMENT

The Senior Managers are ultimately responsible for the implementation of the policy and adherence to its associated legislation.

Management will ensure that:

- All Employees are aware of the policy and the arrangements, and the reasons for the policy.
- Grievances concerning discrimination are dealt with properly, fairly and as quickly as possible.
- Disability Champions will be able to liaise with the Senior Management Team to ensure that any feedback, values or grievances from Disabled Employees are actioned promptly and confidentially.
- There is support of employees who are sick or absent from work
- Proper records are maintained.
- Monitoring is carried out and reported back to the Board annually.

3. RESPONSIBILITIES OF STAFF

Responsibility for ensuring that there is no unlawful discrimination rests with all Employees and the attitudes of Employees are crucial to the successful operation of fair employment practices. In particular, all Employees should:

- Comply with the policy and its arrangements.
- Not discriminate in their day to day activities or induce others to do so.
- Not victimise, harass or intimidate other Employees or groups who have, or are perceived to have one of the protected characteristics.
- Ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- Inform their manager if they become aware of any discriminatory practice.

4. MONITORING

A monitoring system will be introduced to measure the effectiveness of the policy and arrangements.

The system will involve the routine collection and analysis of information on Employees by age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, background, race, religion and belief, sex, or sexual orientation, grade and length of service in current grade.

There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training/development opportunities affect equal opportunities for all groups.

The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.

5. DISCRIMINATION

The Company recognises that discrimination may occur in different forms. It can be direct (including by association or perception), indirect, or in the form of harassment and victimisation. The Company does not tolerate these forms of discrimination and will ensure its policies, procedures and work ethics will provide equality and fairness for all and will immediately investigate any reports of potential discrimination.

2.1 Direct Discrimination

Direct discrimination occurs where one individual treats or would treat another individual less favourably on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, background, race, religion and belief, sex, or sexual orientation (the “**protected characteristics**”). Direct discrimination can also be associative and perceptive:

Associative Discrimination occurs where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.

Perceptive Discrimination occurs where an individual is directly discriminated against or harassed based on a perception that he or she has a particular protected characteristic when he or she does not, in fact, have that protected characteristic.

2.2 Indirect Discrimination

Indirect Discrimination occurs when there are rules, regulations or procedures in place that have a discriminatory effect on certain groups of people.

2.3 Harassment

Harassment occurs when there is any unwanted conduct in relation to a protected characteristic or unwanted conduct that is sexual in nature. In either case, the conduct must have the purpose or effect of:

- violating the dignity of an individual
- creating an intimidating, hostile, degrading, humiliating or offensive atmosphere for an individual.

2.4 Victimisation

Victimisation occurs when an Employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he or she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so, or being about to do so.

6. DISABILITY DISCRIMINATION

The Company, as a Disability Confident employer, does not tolerate any form of direct or indirect discrimination against a person on the grounds of current or past disability or arising from their disability in relation to recruitment and the provision of its services.

6.1 Reasonable Adjustments

The Company shall monitor its policies and procedures to ensure that disabled applicants and Employees are not at a substantial disadvantage in comparison to a non-disabled applicant or Employee when accessing goods, facilities and services. The company will have quarterly and annual review meetings to ensure our Disability Confident policies are up-to-date and improved where necessary.

The Company shall make reasonable adjustments to the physical feature of our business premises and environment to better enable disabled people access to our goods, services and facilities.

The Company shall make every effort to assist disabled employees in managing their disabilities or health conditions and maintain the services of an Employee who becomes disabled, e.g. provision of special equipment, reduced working hours, employee assistance programme.

7. IMPLEMENTATION

In order to implement this policy we shall:

- Communicate the policy to Employees, job applicants and relevant others (temporary workers).
- Incorporate specific and appropriate duties in respect of implementing the equal opportunities policy into job descriptions and work objectives of all staff.
- Provide equality training and guidance as appropriate.
- Ensure that our recruitment practices will include appropriate open recruitment methods such as the use of internet job boards, social media sites such as LinkedIn, referrals, employment agencies and job centres.
- Ensure that those who are involved in assessing Employees for recruitment or promotion will be trained in non-discriminatory selection techniques.
- Ensure that those who are involved in assessing candidates on behalf of clients will be trained in non-discriminatory selection techniques.
- Incorporate equal opportunities notices into general communications practices (e.g. staff newsletters, intranet).
- Obtain commitments from other persons or organisations such as subcontractors or agencies that they too will comply with the policy in their dealings with our Company and our workforce.
- Ensure that adequate resources are made available to fulfil the objectives of the policy.

8. RECRUITMENT

The Company will seek to recruit from the widest possible talent pool which may include online job boards, social media sites such as LinkedIn, referrals, employment agencies and job centres in order to ensure opportunities are available to individuals from across all social and cultural environments.

The Senior Managers will regularly review all aspects of recruitment to avoid unlawful or undesirable discrimination.

9. FINDING CANDIDATES FOR CLIENTS

The Company shall not tolerate staff discriminating against any candidate/temporary worker for whatever reason when selecting candidates for submission to clients for a vacancy or assignment. The Company requires that staff assess each candidate only in accordance with the candidate's merits, qualifications and abilities to perform the relevant duties required by the job description.

The Company will not accept instructions from clients that indicate an intention to discriminate. We will strive to make sure that our clients meet their own diversity targets.

10. GRIEVANCES/DISCIPLINE

Employees who believe they have suffered any form of discrimination, harassment or victimisation are entitled to raise the matter by following the procedures laid out in the Employee Handbook.

Every effort will be made to ensure Employees who report an act of discrimination, harassment or victimisation will be dealt with seriously, promptly and confidentially.

Discrimination, harassment and victimisation will be treated as disciplinary offences and they will be dealt with in line with the Company's Disciplinary Procedure.

11. LEGISLATION RELEVANT TO THIS POLICY

The Equality Act 2010
Rehabilitation of Offenders Act 1974
Human Rights Act 1998
Employment Rights Act 2000
Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002
Part-time workers (Prevention of Less Favourable Treatment) Regulations 2002

12. CHANGE CONTROL

| Issue No. | Date | Reason for Issue |
|------------------|-------------|--|
| 5 | 30/06/05 | Update and reflect new legislation |
| 6 | 15/01/07 | Reviewed and amended to include Age Equality Act |
| 7 | 31/03/09 | Updated for continual improvement. |
| 8 | 31/3/2010 | Updated for change of name and new processes |
| 9 | 9/2/2011 | Updated for new company structure |
| 10 | 31/1/2012 | Updated re change of name |
| 11 | 30/8/2012 | Reviewed and updated to include new procedures for adhering to Equality Act 2010 |
| 12 | 24/6/2014 | Reviewed – updated logo |
| 13 | 28/7/2019 | Changed address |
| 14 | 9/2/2023 | Recognition of “background” and disability confident updates |