

Diversity policy

This policy sets out our policy on diversity and explains the law and our commitment in relation to equality of opportunity.

Introduction

We are committed to being an equal opportunities employer and oppose all forms of unlawful discrimination. Our objective is to have a diverse workforce.

We believe that individuals should be treated on their merits and that employment-related decisions should be based on objective job-related criteria such as aptitude and skills. For these reasons, all staff must comply with the policies described below.

1. It is unlawful to discriminate against staff and other workers because of sex, marriage and civil partnership, gender reassignment, pregnancy and maternity, sexual orientation, race (including national origin and nationality), religion or belief, disability and age. These are known as “protected characteristics”.
2. We will endeavour to give training and guidance to all relevant staff, to ensure that the risk of possible discriminatory attitudes affecting decisions are minimised and that there is an understanding of the relevant provisions of applicable legislation.
3. We will ensure that all new staff, and third parties acting on their behalf, are aware of this policy as part of their induction and will regularly review and monitor this policy to ensure its implementation and effectiveness.

Scope of the policy

This policy applies to all staff working for us or working on our premises.

Types of Discrimination

4. The law divides discrimination into four broad categories – direct discrimination, indirect discrimination, harassment and victimisation.
5. **Direct discrimination** involves treating a person less favourably because of a protected characteristic (for example not promoting an individual because of his or her race or sexual orientation). It includes discrimination because of perceptions or assumptions about a person’s characteristics, even if these are incorrect (for example, not promoting an individual because he is assumed to be gay). It also includes discrimination because a person associates with someone who has a protected characteristic (for example, not promoting an individual because he or she has a disabled child. Direct discrimination cannot be justified (with the exception of age discrimination, which can only be justified by an employer in very limited circumstances).
6. **Indirect discrimination** occurs when an apparently neutral provision, criteria or practice is applied across all groups, but this would put those with a particular protected characteristic at a particular disadvantage when compared with others who do not share this characteristic (for example imposing a requirement that candidates for promotion be over six foot tall,

which would particularly disadvantage women). Indirect discrimination will not be unlawful if it can be justified.

7. **Harassment** is unwanted conduct related to a protected characteristic or of a sexual nature which has the purpose or effect of:
 - (1) violating an individual's dignity; or
 - (2) creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.
 - (3) Harassment can occur through conduct by third parties as well as by work colleagues (although an employer may not be liable for acts of a third party).
8. **Victimisation** has a particular legal meaning and involves subjecting a person to a detriment because he or she has complained about discrimination or assisted somebody else in doing so.
9. It is not necessarily an answer to an allegation of discrimination to say that the discrimination was not intentional or deliberate.
10. It is also unlawful to discriminate against job applicants (in recruitment arrangements and decisions), staff and other workers (in relation to terms and conditions of employment/work, opportunities for training and promotion, dismissal and other matters) and to certain ex-staff (e.g. in relation to references).

Disability Discrimination

11. The legislation covering disability discrimination is complex. As well as the types of discrimination explained above, the law also makes it unlawful to treat a disabled person unfavourably because of something arising in consequence of his or her disability, unless this is justifiable. This is a broad test and includes, for example, treating someone unfavourably because they need to take time off work for medical treatment due to a disability. The law also imposes a duty in certain circumstances to make reasonable adjustments to accommodate the needs of the disabled person, which could include alterations to work stations, duties, hours or working practices.
12. All reasonable and necessary adjustments for a disabled person will be investigated and any reasonable adjustments will be made to the workplace and to employment arrangements so that disabled people are not at any substantial disadvantage compared to non-disabled people. This covers all areas of employment, including recruitment, promotion and training.
13. In recruitment and selection, we will modify selection techniques, where appropriate, and make any other reasonable changes to ensure that all candidates can be considered equally. Please refer to our Inclusive Hiring Guidelines for further information.
14. We will ensure that disabled people will receive equal treatment in training and development, and, where appropriate, will supply additional training.
15. A flexible approach will be adopted and, where possible and justified, consideration to reallocation of duties, time off for rehabilitation, assessment or treatment or other appropriate measures to ensure equal opportunity.

16. Every endeavour will be made to ensure that third parties engaged by us are not discriminated against because of their disability and will ensure that any third parties engaged by us are aware of this policy.
17. The group of people protected as “disabled” within the legislation is wider than you might think. It covers not just those with physical disabilities, such as people in wheelchairs, but also people with mental impairments and less obvious physical impairments (such as, for example, some forms of RSI and clinical depression). Depending on the circumstances, lack of knowledge that someone is disabled may not be a defence; you should always consider that an individual might be impaired.

Recruitment

Please refer to our Inclusive Hiring Guidelines for further information.

18. All advertising and recruitment literature should reflect our commitment to equal opportunities and not enhance stereotypes.
19. Wherever possible, all vacancies should be advertised simultaneously internally and externally. Where vacancies are to be filled by promotion or transfer, they should be published to all eligible staff in such a way that they do not restrict applications from particular groups. Do not rely solely upon “word of mouth” recruitment as this can perpetuate any existing mix of groups within our workforce.
20. Recruitment process:
21. The recruitment process should not disadvantage disabled people and reasonable adjustments to the process (and particularly at any interview) should be considered.
22. The criteria for selection should be fair and appropriate. Any criteria which disadvantage those with certain protected characteristics should be retained only when justifiable in terms of the job to be done.
23. Questions at interview should relate to the requirements of the job. Where it is necessary to assess whether personal circumstances will affect performance of the job (for example where it involves unsociable hours or extensive travel) this should be discussed openly and objectively with all candidates without assumptions based on marital status or sex. Questions should not be asked which could disadvantage certain groups, and questions should not be asked of those with a particular protected characteristic that would not be asked of everyone.
24. Selection procedures should be objective. Each candidate should be assessed according to their capability to carry out the job. It should not be assumed that certain groups should perform certain kinds of work or “will not fit in”.
25. When considering a disabled candidate’s suitability for the job, he/she should be assessed on the assumption that any reasonable adjustments have been made (for example, if someone needs a special keyboard and this is a reasonable adjustment, his/her ability to do the job compared with other candidates should be assessed on the assumption that the keyboard has been provided).

26. Wherever possible, more than one person should be involved in the recruitment process and all should have some training in equal opportunities.
27. The reasons for selection and rejection of candidates should, where practical, be recorded.

Pay and Benefits

28. Equal pay should be paid for work of equal value, unless there is a material factor that accounts for the variation.
29. Benefits should be offered to all staff equally unless there is a good justification for not doing so. We will try to be flexible and accommodate cultural or religious holidays and religious restrictions on hours of work.

Promotion and Training

30. Staff should have equal opportunities for promotion and training and all staff should have the opportunity to discuss their future development and promotion prospects with their managers. When general ability and personal qualities are the main requirements for promotion to a post, care should be taken to consider properly candidates with differing career patterns and general experience. There should be no stereotypical assumptions about the ambitions or otherwise of any individual from a particular group.
31. Training and development should not stop because someone is pregnant or has childcare responsibilities. Nor should it be assumed that such staff are not interested in promotion.
32. Managers should not base decisions about promotion, training or career development on whether or not the employee participates in social events with colleagues outside of office hours, particularly where those events involve alcohol, particular locations or activities and might therefore discourage individuals from certain groups from joining in.

Disciplinary, Performance Improvement and Redundancy

33. Care should be taken to ensure that those with a particular protected characteristic are not sanctioned for performance or behaviour that would be condoned or overlooked in another group.
34. If selection for redundancy becomes necessary, direct and indirect discrimination should not occur in the selection criteria or process. For example, be careful when using absence-related criteria (because these may disadvantage disabled or pregnant workers) and adjustments might need to be made to ensure that such criteria are fair.

Your Responsibilities

What to do if you have a complaint?

35. If you believe that discrimination is, or may be, taking place, if you feel uncomfortable about a situation or have concerns about someone's behaviour or conduct you could speak informally to the person responsible, discuss it with your Manager or a member of your People Team.

36. You may also consider raising a grievance or, if you are being harassed, a complaint for bullying. Speak to someone from the People Team if you are unsure or need guidance and advice.
37. We operate a 'Take a Break' approach, aimed at helping you to speak out if an incident occurs which is discriminatory or derogatory.
38. The process detailed below will also form part of our induction programme.

The "TAKE A BREAK" Process

39. The primary aim of Take a Break is to create some space and move the conversation into an appropriate place.

To immediately stop an exchange - here are a few examples of what you can say;

- "Can we take a break here...?"
- "That's not an appropriate comment..."
- "That language is not appropriate ..."
- "What's been said may cause offence..."

The individual(s) can then either:

- fully voice their concern if they feel able to do so, or
- remove themselves from the situation or move the conversation on to an appropriate topic and then later raise their concern with someone they feel more comfortable talking to. This could be their line manager, a member of the People Team, a Pillar representative from our RDI council or an I-network Lead.

40. After any incident the People Team should always be informed so that they can investigate and offer appropriate support.
41. If any incident involves a client, the lead account manager for that client as well as the People Team should be informed so that the incident can be investigated, and recommendations communicated to the client.
42. We know that in some instances it might be challenging or difficult to stop an exchange in the moment, we have 3 different approaches to escalating Take A Break and you can use whichever you feel most comfortable with.

Anonymous reporting:

43. We know that for many people whatever process we put in place, the reassurance of anonymity will be a priority. Therefore, we will continue to monitor and keep in place the anonymous feedback link which can be used to report any incident. In this instance we will be more limited in the action we can take, but it will be raised, recorded and reviewed.
https://app.suggestionox.com/r/ask_us_anything

Indirect reporting

44. If you want to reach out for support and escalation outside of your reporting line, we have created a mechanism for you to do so. The simple process is:
- Send an email to Inclusion@enginegroup.com simply stating that you would like to activate the Take a Break policy, and speak to someone in a different pillar/team. You can leave this open, or specify the pillar you would like to be connected with, and if you have a preference for speaking to a woman or a man or someone from a specific i-Network.
 - This email address is monitored by Helen Alton and Sophie Perks who administer the Inclusion Council. They will identify someone outside of your pillar or central team, and suggest that person as your connection. Only if you confirm you are comfortable, will they connect you directly with that individual and step out of the process.
 - The individual will be able to listen to your experience, and you can agree next steps on action and escalation. The individual will act as a conduit for action, they will provide the role of neutral facilitator. Dependent on the nature of the experience it may be appropriate to involve someone from The People team, however, the individual you are working with will always be open and manage this sensitively working with you if this is the case.

Directly report

45. If you want to raise an issue directly with your People Team who may have a stronger tie to your context, connect directly with your Pillar HR lead. If you email or slack them and call out the Take a Break policy, they will immediately understand the sensitive nature and manage the conversation with absolute discretion. They will agree with you what the next steps are and also signpost and help you access support.

Overall responsibilities

46. Responsibility for this policy rests with us all, all Managers are responsible for ensuring that this policy is applied within their own area.
47. Everyone has a personal responsibility to comply with this policy and ensure that it is adhered to in your day-to-day work. You must not discriminate or help others to do so in contravention of this policy. Breaches of this policy will be taken seriously and are likely to result in disciplinary action, up to and including dismissal. You may also be personally liable towards anyone you unlawfully discriminate against, and may have to pay compensation on top of any compensation we might be ordered to pay, in the event that discrimination is found to have taken place by an Employment Tribunal.

Application of this policy

48. We aim to apply this policy to all those working at our workplace, including agency, casual and freelance staff as well as staff. Aspects of this policy may need to be applied in different ways

to cater for those who are not staff (for example the sections on recruitment are likely to apply mainly to staff).

Status of the policy

49. This policy is not part of your contract of employment and does not create contractual rights or obligations. It may be amended by us at any time.

Who to contact for questions

50. If you have any questions regarding our Diversity Policy, please contact your People Team.