



EQUALITY, DIVERSITY AND INCLUSION POLICY

POLICY NO: 04 – Equality, Diversity and Inclusion

Last Reviewed July 2021

1. BOARD COMMITMENT

- 1.1 Protocol aims to create a working environment that respects people as individuals, their right to be different and supports people to be different. Protocol seeks to employ a diverse workforce that feels comfortable and motivated in the workplace in the knowledge that they are supported to give of their best, that decisions are taken fairly, and their impact considered, and that each is free from bullying and harassment or discrimination.

2. POLICY STATEMENT

- 2.1 It is Protocol's policy to treat employees, job applicants and contract workers equally without discrimination. The Company will avoid unlawful discrimination in all aspects of employment from recruitment to dismissal and former workers' rights.
- 2.2 Protocol opposes all forms of unlawful and unfair discrimination. The Company will employ, train and promote employees based on their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. In this policy these are known as the 'protected characteristics'.
- 2.3 Furthermore, the Company will monitor the composition of the workforce and may consider lawful positive action if it appears that this policy is not fully effective.
- 2.4 Protocol is committed to the principle of equal pay for all its employees and aims to eliminate any sex bias in the pay system.
- 2.5 The Company will take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free from harassment and bullying based upon age, disability, gender reassignment, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. These are known as the 'anti-harassment protected characteristics'. Full details on the company approach to bullying and harassment is contained in the Protocol Terms and Conditions and the Harassment and Bullying Policy.
- 2.6 The Company will not condone or tolerate any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company, such as clients, customers, contractors, or suppliers.
- 2.7 Employees have a duty to co-operate with the Company in preventing discrimination, harassment, or bullying. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of the Equality, Diversity and Inclusion and/or Harassment and Bullying Policy statement(s) will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held **personally** liable for any act of unlawful discrimination or harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.
- 2.8 Staff should draw the attention of their line manager to suspected discriminatory acts or practices or suspected cases of harassment or bullying. It is an illegal act to victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the company disciplinary policy. The company will also

take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against its employees.

3. PROCEDURE

- 3.1 Protocol is an equality, diversity and inclusion employer. Equality, diversity and inclusion is about good employment practices and efficient use of our most valuable asset, the right employees. Every employee has a personal responsibility for the implementation of this policy. Any instance of doubt about the application of the policy, or other questions, should be addressed to the Head of Department, as should any requests for special training.
- 3.2 Protocol will not discriminate either directly or indirectly based on any protected characteristic.
- 3.3 Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.
- 3.4 Indirect discrimination can occur where there is a condition, rule, policy, or a practice that applies to everyone but particularly disadvantages people who share a protected characteristic.
- 3.5 Employees involved in recruitment should request training if they have any doubt about the application of this policy.
- 3.6 The Company recognises that staff may feel uncomfortable about sharing information about their specific individual needs, possibly through fear of discrimination by the Company or as a point of unwelcome focus from other staff members. In such instances staff are encouraged to talk to a member of the Company's senior management on an assured confidentiality basis.
- 3.7 Staff who are disabled on appointment or become disabled in the course of their employment should inform the Company and may also wish to advise the Company of any "reasonable adjustments" to their employment or working conditions which they consider would assist them in the performance of their duties. A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Direct disability discrimination occurs where a disabled person is treated unfavourably because of something connected with their disability. Indirect disability discrimination occurs where a particular rule or requirement disadvantages people with the same disability. The Company will not tolerate direct or indirect disability discrimination which is knowingly committed by its staff, visitors, or contractors.
- 3.8 Staff who are pregnant on appointment or become pregnant in the course of their employment should inform the Company so that the Maternity Policy can be enacted.
- 3.9 Staff who are considering gender reassignment or who require specific changing or toilet facilities are encouraged to inform the Company so that specific needs can be accommodated.
- 3.10 Staff that have a religious belief or beliefs that may need a degree of flexibility, e.g., a private place to pray, specific days or events in the calendar that could affect attendance or performance, should inform the Company on appointment so that adjustments to the normal working day can be made. Staff that change their religious belief(s) during their employment should also inform the Company if the same flexibility applies.

3.11 The Company objectives regarding equal pay are to:

- Eliminate any unfair, unjust, or unlawful practices that impact on pay.
- Take appropriate remedial action if identified.
- For the purpose of this Policy and in line with relevant legislation, pay is defined by Article 141 of the Treaty of Rome as:

“The ordinary basic or minimum wage or salary and any other consideration, whether in cash or kind, which the worker receives directly or indirectly, in respect of his (or her) employment from his (or her) employer.”

3.12 Any employee may (and should) use the grievance procedure to complain about discriminatory conduct. If the matter relates to sexual or racial harassment or harassment based on disability, then the grievance may be raised directly with the Chief Executive. If the complaint relates to equal pay the employee should raise the grievance directly with their Line Manager. The Company is concerned to ensure that employees feel able to raise such grievances and no individual will be penalised for raising such a grievance unless it is untrue and/ or made maliciously.

4. DISCIPLINE

4.1 Any employee who harasses any other employee on the grounds of any protected characteristic will be subject to the organisation’s disciplinary procedure. In serious cases, such behaviour will likely be deemed to constitute gross misconduct and as such may result in summary dismissal. Please also refer to The Harassment and Bullying Policy.

5. MONITORING

5.1 All employees and job applicants will be asked to complete a form denoting their sex, race, ethnic origin, and any disabilities. The Company guarantees that this form will be used for the purpose of monitoring the effectiveness of its Equality, Diversity and Inclusion Policy only.

6. POSITIVE ACTION

6.1 The composition of the workforce and of job applicants plus salary scales will be monitored. Should inequalities become apparent, lawful positive action may be taken. Such measures may include:

- Advertising jobs in relevant publications, as appropriate.
- Introducing English language training.
- Encouraging under-represented groups to apply for suitable posts.
- Amendments to salaries.

7. RESPONSIBILITY

7.1 All staff have a responsibility to ensure that their behaviour cannot be misinterpreted. We also have a responsibility to offer support to fellow employees who may have been the subject of discrimination or similar and to encourage them to speak up about the behaviour and to report examples of this behaviour to the relevant parties.

POLICY ENDS