



# EQUALITY & DIVERSITY POLICY

## KNIGHTS BROWN

Our vision is to be a company people aspire to work for, where we will always endeavor to deliver the best experience for our customers.

Knights Brown recognises that its underlying success depends on recruiting and retaining the best people and creating an environment where they are able to reach their full potential. Our guiding principles, which were defined by our employees, describe the values that are important to us and steer us in how we work with and treat each other.

Our six guiding principles are;

- **FOSTER TEAM SPIRIT**  
**We are stronger together**
- **INSPIRE CONFIDENCE AND ADMIRATION**  
**We build respect through trust**
- **FACE CHALLENGES WITH ENTHUSIASM**  
**We are adventurous, encouraging, creative and open minded**
- **BUILD OPEN AND HONEST RELATIONSHIPS**  
**We listen to what others have to say**
- **ADD VALUE THROUGH SIMPLICITY**  
**We are straightforward and uncomplicated**
- **TAKE PRIDE IN SUCCESS**  
**We challenge the way we work to find a better way**

Our culture of co-operation, inclusivity and achievement underpins the high quality of the services we offer.

## STATEMENT OF INTENT

Knights Brown does not discriminate on the basis of 'protected characteristics'. Protected characteristics include gender, disability, race, colour nationality, ethnic or national origin, sexual orientation, gender reassignment, religion or belief, marital status or civil partner status, age and pregnancy and maternity. This policy applies equally to the treatment of our visitors, clients, customers and suppliers by our employees and the treatment of our employees by these third parties.

The company values the diverse nature of its people and seeks to manage any diversity issues which arise in a fair and sensitive manner.

Everyone has a duty to act in accordance with this policy and to treat colleagues with dignity at all times. The company will not tolerate any discriminatory practices and behaviour.

The equality and diversity policy (the Policy) does not form part of any employee's contract of employment and it may be amended at any time.

KEVIN VALENTINE | MANAGING DIRECTOR  
JUNE 2021



## CORE POLICY

In accordance with its statement of intent, the company commits itself to the following:

1. The company's success is dependent upon all employees having equality of opportunity and encouragement to progress within the company.
2. Everyone is asked to take responsibility for their personal involvement in the practical application of the Policy, the spirit of which is underpinned within everyone's role description.

To facilitate this:

- I. Copies of the Policy are issued for all new starters joining the company and are available on our Intranet 'Sika', our management system (IMS) and company notice boards. Everyone is responsible for the success of the Policy and must ensure that they familiarise themselves with the Policy and act in accordance with its aims and objectives. All new employees attend a corporate induction, where they are provided with information on the Policy.
- II. Those working at management level have a specific responsibility to set appropriate standards of behaviour, to lead by example and to ensure that those they manage adhere to the Policy. Management development programmes will raise awareness of the Policy as well as providing support to managers in promoting equality and diversity in the workforce.
- III. All legal obligations under the Equality Act 2010 and other legislation detailed on the last page of this policy will be recognised.
- IV. This policy will be reviewed annually or as necessary from time to time.
- V. Grievance procedures are provided for any employee who believes they have been treated unfairly or subjected to discrimination, harassment, bullying or victimisation. Issues can be raised through the grievance procedure as outlined in our employee handbook.

- VI. The disciplinary procedures may be used where employees fail to observe their own responsibilities for this policy.
- VII. Discrimination may be considered an act of gross misconduct which can lead to summary dismissal or summary termination of contract/engagement.
- VIII. The Managing Director will assume the main responsibility for implementation and revision of the Policy.
- IX. The company offers an Employee Assistance Programme (EAP) which provides 24 hour confidential access to support, information and resources to address a wide range of issues at home and at work.

## FORMS OF DISCRIMINATION – PRINCIPLES

- Discrimination may be direct or indirect and it may occur intentionally or unintentionally.
- Direct discrimination occurs where someone is treated less favourably than another person because of a 'protected characteristic'. The protected characteristics are set out in our Statement of Intent referred to earlier in the Policy. Direct discrimination occurs when someone is treated less favourably than another person because of association with another person who possesses a protected characteristic. Discrimination by perception occurs when someone is treated less favourably because others think they possess a protected characteristic even if they do not actually possess that characteristic.
- Indirect discrimination occurs where someone is subjected to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of a protected characteristic. Indirect discrimination can be justified if it is a proportionate means of achieving a legitimate aim.
- It is also unlawful discrimination to treat a disabled person unfavourably because of something arising in consequence of their disability, except where you can show that the treatment is a proportionate means of achieving a legitimate aim.



- Disability discrimination also includes a failure to comply with a duty to make reasonable adjustments.
- Discrimination also includes victimisation which occurs when a person is subjected to a detriment because they have done a protected act or it is believed the person has done, or may do, a protected act. A protected act, for example, when a person brings proceedings under the Equality Act 2010 or makes an allegation that someone has contravened the Equality Act 2010. Giving false evidence or information, or making a false allegation, is not a protected act if the evidence or information is given, or the allegation is made, in bad faith.
- Discrimination also includes harassment which occurs when a person is subjected to unwanted conduct related to a relevant 'protected characteristic' which has the purpose or effect of violating the person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for him/her.

## EQUALITY AND DIVERSITY IN RECRUITMENT, SELECTION, DEVELOPMENT AND TRAINING

### RECRUITMENT OF EMPLOYEES

The Policy applies to all aspects of the company's relationship with employees and to relations between employees at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

The intention of the company is to recruit the most suitable person for any position in a fair and non-discriminatory manner. It is essential that recruitment and selection procedures are based on objective criteria related to the needs of the job, and that such criteria are applied equally at all stages during the process to all applicants at all levels within the company.

The company has recently become a sponsoring organisation to sponsor migrants under the Tier 2 points based system and takes the duties and responsibilities this requires seriously.

### RECRUITMENT PROCEDURES

- I. All advertisements should conform to the company's standard. Recruitment and publicity literature will confirm that we are an inclusive organisation. If in doubt contact and ask HR for advice and guidance.
- II. Each role advertised should be accompanied by a role description.
- III. Vacancies should be publicised appropriately to as wide a range of suitable candidates as possible. Personal word of mouth recommendations should not be used as the sole method of recruitment.
- IV. Employment agencies, where their use is required, should be made aware that the company is an equality and diversity employer. Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying.
- V. Equal opportunity information gathered from job applicants at application stage should be stored anonymously on a central database for reporting purposes only. It should not be used to form part of the short-listing process under any circumstances; shortlisting should be done by merit of application and by no other means. Disclosure of such information should be optional to candidates.
- VI. Applicants will not be asked about past or current pregnancy or childbirth or future intentions related to pregnancy or childbirth.
- VII. Applicants will not be asked health-related questions before a job offer is made except where the question is necessary to decide whether any reasonable adjustments should be made to the selection process, to establish whether a candidate will be able to carry out a function that is intrinsic to the job or to monitor diversity amongst people applying for jobs.
- VIII. Should a candidate with a disability be invited to attend for interview, the company shall make any reasonable adjustments necessary to facilitate their attendance.

Candidates should advise the company where such adjustments are necessary.

- IX. The company takes appropriate and reasonable steps to accommodate the requirements of candidates' religions, cultures and domestic responsibilities.
- X. Directors may, at their discretion, use professional search consultants if the appointment is of a senior or specialist nature, and where obtaining suitably qualified candidates by traditional recruitment methods is regarded as unlikely to secure the most talented candidates.
- XI. The company is required by law to ensure that all employees are entitled to work in the U.K. Assumptions about immigration status will not be based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documentation (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from HR or the UK Border Agency.

## SELECTION

The following guidelines should be observed when short-listing and interviewing candidates:

- I. Short-listing candidates should be objective, based on those skills, expertise and knowledge necessary to carry out the job. The requirement for formal academic or professional qualifications may be waived if candidates clearly demonstrate their suitability by other means. Willingness to undergo training should be taken into account.
- II. Similarly, it should not be assumed that overseas degrees or diplomas are of a lower standard than their equivalents in the UK. If in doubt there are a number of agencies such as UCAS who are able to determine the level of equivalence of overseas qualifications.
- III. Interview questions should be relevant to the job; care being taken to ensure that no assumptions are made or leading questions asked relating to personal circumstances.

If job requirements are likely to affect a candidate's personal life (eg. unsociable hours or travel arrangements) then the same questions regarding these should be asked of all applicants.

- IV. Skills, knowledge, ability and competence will be the main criteria for selection and promotion.

Any interviewer should have had relevant training to ensure that they are familiar with these requirements.

## EMPLOYEE DEVELOPMENT AND TRAINING

The company wishes to ensure that no employee is disadvantaged in the provision of appropriate training and development opportunities. The following procedures should be followed:

- I. All employees should participate in the performance development review process, who will jointly consider progress with their line manager in line with our guiding principles, review effectiveness of development undertaken and consider future development opportunities in line with strategic objectives.
- II. All employees will have access to and be encouraged to take advantage of suitable training and development opportunities.
- III. Decisions relating to career development should be passed on objective criteria which are fairly applied. The ability to meet the requirements of the position successfully should be the main criterion for promotion.
- IV. Training is provided in order to increase the knowledge and skills of employees and all training course materials and content will reflect the company's position as an equality and diversity employer.

## DISABILITY

If someone is disabled or becomes disabled in the course of their employment or engagement, they are encouraged to inform the company about their condition as soon as possible in order that they can be supported and consideration can be given to making reasonable adjustments.

The company works closely with an occupational health provider to support this process.

### **BULLYING AND HARASSMENT**

The company seeks to embed a culture which eliminates bullying and harassment. Everyone should treat others with the respect and dignity that they would expect for themselves. Bullying and harassment of others in any form will not be tolerated and will be dealt with under the company's disciplinary procedures. Bullying or harassment may be considered as acts of gross misconduct which can lead to summary dismissal or summary termination of contract/engagement.

### **VICTIMISATION**

Victimisation occurs when an individual is subjected to a detriment because they have brought proceedings under the Equality Act 2010; or given evidence or information in connection with proceedings under the Equality Act 2010; or done any other thing for the purposes of or in connection with the Equality Act 2010; or raised a grievance/allegation about discriminatory behaviour. It is unlawful to victimise individuals. Employees found guilty of victimisation or inducing others to discriminate in connection with their employment with the company, or intentionally failing to comply with the Policy will be subject to the company's disciplinary procedure, and such conduct may be considered as acts of gross misconduct which can lead to summary dismissal.

### **HUMAN RIGHTS**

The company's business activities are pursued with respect for human rights. As such, the company needs to ensure and to demonstrate they treat everyone fairly, legally, with respect and with dignity. It is not acceptable to abuse the human rights of either individuals or groups of individuals.

The company will not participate in, contribute to or obtain information from any blacklist or other similar service which undermines these principles and as part of this obligation the company will ensure that compliance with the Business Ethics Policy, as well as this Equality and Diversity Policy, will form part of the selection process for appointing subcontractors and other members of the company's supply chain.

### **FIXED TERM EMPLOYEES OR AGENCY WORKERS**

The company monitors the use of fixed-term employees and agency workers and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities.

### **PART-TIME WORK**

The company monitors 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. The company will ensure requests to alter working hours/work flexibly are dealt with appropriately.

### **MANAGEMENT RESPONSIBILITIES**

Compliance with the Policy depends upon the commitment of everyone, including all directors, managers and supervisors who will take a lead in implementing the Policy and making themselves aware of what the law requires of them. Management is responsible for ensuring that the workplace is free of discrimination (including harassment and victimisation) and bullying and must take prompt action to resolve complaints and prevent any further recurrence.

### **INDIVIDUAL RESPONSIBILITIES**

The company encourages all individuals to take responsibility for their personal involvement in the practical application of this Policy, and for creating a work environment which eliminates all forms of discrimination (including harassment and victimisation) and bullying.

Any employee found to have breached the Policy in their working relations with others will be subject to the disciplinary procedures outlined in the company's disciplinary policy, up to and including summary dismissal.

Anyone else found to have breached the Policy in their working relations with others will be subject to action up to and including summary termination of contract/engagement.

### **MONITORING**

As part of the company's commitment to equality and diversity, monitoring is carried out regularly. Information from monitoring will enable the company to consider and implement any actions to improve our diversity and ensure the Policy is adhered to.

In particular, the company will report on key measures which include gender composition of the workforce, age, race and ethnic origin and sexual orientation, disability, religion or belief.

We undertake an employee satisfaction survey on an annual basis and can review responses in line with certain equality criteria.

### HOW TO MAKE A COMPLAINT

If anyone feels they have a grievance or a complaint under the Policy, they may in the first instance (if they wish and feel comfortable to do so) make the issue known to the person responsible for the behaviour and request that it should cease. Individuals may also, as an alternative, seek the direction of guidance of their manager, director/managing director, or member of HR in attempting to resolve matters in an informal manner.

Where it does not prove possible to reconcile issues informally, or if a person does not for any reason want a matter dealt with informally, employees have the right to a formal hearing using the company's grievance procedure. The grievance process is outlined in the company handbook which is provided to all employees on commencement of their employment. Additional copies can be obtained from HR.

Grievances or complaints linked to equality and diversity will be dealt with in the strictest confidence and will not prejudice the employee's current employment status or future career prospects (or a worker's/contractor's status or prospects with the company). Vexatious allegations, false allegations made in bad faith or a breach of the Policy may, however, be considered a disciplinary offence. Vexatious allegations or false allegations made in bad faith may result in disciplinary action up to and including summary dismissal or summary termination of contract/engagement.

Allegations regarding potential breaches of the Policy will be treated in confidence and fully investigated.

### EMPLOYEE ASSISTANCE PROGRAMME

Our confidential Employee Assistance Programme is available 24 hours a day to all our employees and can provide support and advice as required, details below:

Telephone 0800 072 7 072

[www.axabesupported.co.uk](http://www.axabesupported.co.uk)

### EQUALITY AND THE LAW

The following legislation provides further relevant information and guidance:

- Race Relations Act 1976 (as amended)
- Sex Discrimination Act 1975 (as amended)
- Disability Discrimination Act 1995 (as amended)
- Employment Rights Act 1996
- Equal Pay Act 1970
- Rehabilitation of Offenders Act 1974
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sexual Orientation) Regulation 2003
- The Equality Act (Sexual Orientation) Regulations 2007
- Employment Equality (Age) Regulations 2006
- Work and Families Act 2006
- The Equality Act 2006
- Protection and Harassment Act 1997
- Employment Act 2002
- Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- Equality Act 2010
- Enterprise and Regulatory Reform Act 2013