DIVERSITY, EQUITY AND INCLUSION POLICY

Document control

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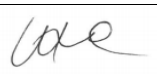
Classification	Internal	**Approved By:**	

*This Policy is available in other formats and languages if required, please contact the People Team

Version Control

Effective Date	Version	Changes	Author(s)
Mar 2021	-	Introduction of version control page	Kelly Convery
Mar 2021	2	Updated Introduction. Updated Company Name. Updated clauses and subclauses so all sections were. covered and can be referred to accordingly. Updated clause 3 and included old clause 9 re responsibility. of policy. Updated clause 5. Updated clause 6. Updated clause 7. Updated clause 8 to include disabilities. Added new clause 9 – termination of employment. Updated contact information for clause 11. Added clauses 13 & 14.	Kelly Convery and Legal Team
Jan 2022	2.1	Updated clause 3.5.	Kelly Convery
Mar 2023	3	As part of the Policy review, the following changes have been implemented. New template. Change of title from Equal Opportunities Policy to Diversity, Equity, and Inclusion Policy Appendices included – Flowchart and FAQs. References to internal policies and external legislation/guidelines added. Removal of Clause numbers and excess wording to make it more user friendly. Removal of previous Clause 2 and included in clause 1. Amalgamated key points within Clause 3 and made them Clause 2 to make new Clause 1 - Purpose. Updated new Clause 2 – Responsibility for this policy. Removal of Designated Officers in new Clause 2. Added new Clause 3 – Diversity and Inclusion Training. Removal of old Clause 4 – Definition.	Kelly Convery, Sam Moralee, and Alexandra Besnard

		Updated new Clause 4 – Types of Discrimination. Updated old Clause 7 to new Clause 5 – Recruitment and Selection. Removal of old Clause 6 and 7 – Unlawful reasons for Discrimination and Positive action in the workplace. Added new Clause 7 – Part-time and Fixed term work. Updated old Clause 10 to new Clause 8. Updated old Clause 11 to new Clause 9. Removal of old Clause 10 – Termination of employment. Removal of old Clause 12. Removal of old Clause 13 – review of policy. Updated old Clause 14 to new Clause 10.	
May 2024	4	Introduced a new Clause 7 'Menopause in the workplace'. Updated new Clause 5 – Age Updated new Clause 6 – Disability Updated new Clause 7 – Gender Reassignment Updated new Clause 8 – Marriage or Civil Partnership Updated new Clause 9 – Pregnancy and Maternity Updated new Clause 10 – Race Updated new Clause 11 – Religion or Belief Updated new Clause 12 – Gender Updated new Clause 13 – Sexual Orientation. Updated old Clause 5 to new Clause 14. Updated old Clause 6 to new Clause 15. Updated old Clause 7 to new Clause 16. Updated old Clause 8 to new Clause 17. Updated old Clause 9 to new Clause 18. Updated old Clause 10 to new Clause 19. Updated old Clause 11 to new Clause 20. Updated old Clause 12 to new Clause 21. Updated old Clause 13 to new Clause 22. Updated the FAQs Updated Font to Size 12 and Header's size 16	Yasmin Storey
July 2025	4.1	Reference section updated to include Preventing Sexual Harassment Policy.	Carly Thompson

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1. PURPOSE

Global Procurement Group ("we") is committed to actively promoting equal opportunities in employment and creating a workplace culture in which diversity and inclusion is valued and everyone is treated with dignity and respect. We wish to achieve a working environment that promotes a zero-tolerance approach to discrimination in any form and you and any job applicants will receive equal treatment regardless of their age, disability, gender & gender reassignment, marriage and civil partnership, pregnancy and maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, and sexual orientation ("Protected Characteristics"). Any issues or breaches of this policy will be dealt with under our Disciplinary Policy and Procedures.

This policy sets out our approach to diversity, equity, and inclusion. Our aim is to encourage and support diversity, equity and inclusion and actively promote a culture that values difference and eliminates discrimination in our workplace. It applies to all aspects of employment with us, including recruitment, pay, benefits and conditions, flexible working and leave, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

We are also committed to providing equitable treatment to all those we deal with as an organisation, including customers and suppliers.

This policy applies to employees, officers, consultants, contractors, volunteers, apprentices, casual workers, and agency workers ("Employees"). It is not part of your employment contract. It may be amended at any time.

For those Employees who are based outside of the UK, should there be any conflict between this policy and local law, or any location-specific Equal Opportunities/Diversity, Equity and Inclusion Policy put in place by the company (or any subsidiary) from time to time, the local law or location specific policy shall take precedence over this policy.

2. RESPONSIBILITY FOR THIS POLICY

The board of directors have overall responsibility for the effective operation of this policy and to ensure we operate in compliance with discrimination law. However, all Employees, customers and clients are expected and have a personal responsibility to act in a way that does not subject any other person to direct or indirect discrimination, harassment, victimisation, or bullying, particularly on the grounds of a Protected Characteristic.

All managers must set an appropriate standard of behaviour, lead by example, and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to diversity, equity and inclusion.

Any individual who fails to operate in accordance with the law could be held personally liable for their acts, and in some circumstances, face legal consequences.

3. DIVERSITY AND INCLUSION TRAINING

Managers will be given appropriate training on recognising and avoiding discrimination, harassment, and victimisation and promoting equality of opportunity and diversity in the areas of recruitment, development, and promotion. The People Director has overall responsibility for equality training, for all employees, as appropriate.

We will provide you with regular training to ensure that everyone is aware of and understands the contents of this policy and the Anti-bullying and Harassment Policy. Following the training, you will be required to confirm that you have read, understand, and will comply with this policy and the Anti-bullying and Harassment Policy.

We will also provide equality and diversity training regularly.

4. TYPES OF DISCRIMINATION

You must not unlawfully discriminate against or harass any person. This includes but is not limited to, current and former employees, job applicants, clients, customers, suppliers, visitors, and members of the public. This applies both inside, and outside of the workplace, whether you are at work or not, as we believe you represent the Company at all times. This includes during any company social events or work-related trips.

Discrimination may be direct or indirect and includes discrimination by perception and association.

The following forms of discrimination are prohibited under this policy and are unlawful under the Equality Act 2010:

Direct Discrimination: treating someone less favourably because of a Protected Characteristic.

Indirect Discrimination: is a provision, criterion, or practice (“PCP”) (for example a rule or a policy, or a way of doing things) that applies to everyone, but which has a worse impact on someone with a Protected Characteristic than someone without one and is not or cannot be objectively justified.

Harassment: is unwanted conduct related to a Protected Characteristic which has the purpose or effect of violating someone’s dignity, or creating a hostile, degrading, humiliating or offensive environment for them.

Victimisation: is retaliation against someone who has taken action under the Equality Act (like making a complaint of discrimination) or supporting someone else who is doing so.

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

Bullying is not covered by the Equality Act 2010, but can be defined as unwanted behaviour from a person or group that is either:

- offensive, intimidating, malicious or insulting; or
- an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.

The Company does not tolerate any form of bullying or discrimination as defined in this policy. Harassment and bullying are covered in more detail in our Anti-bullying and Harassment Policy, so please refer to this policy for more information.

5. AGE

Discrimination by age can occur when you are being treated unfairly or less favourably because of your age. This can include, but not limited to, derogatory remarks, not offering training or progression opportunities, making assumptions on their skills and abilities based on your age. We are committed to preventing age discrimination by promoting an inclusive workplace where employees of all ages are valued for their contributions. We ensure that all employment decisions are based on merit and performance rather than age.

6. DISABILITY

A disability can refer to either a physical or mental impairment that has a substantial and long-term negative effect on your ability to do normal daily activities. Disability discrimination occurs when someone is treated unfavourably because of their disability. This can include failing to provide reasonable adjustments, making negative assumptions about capabilities, or harassment. We are dedicated to creating an accessible and supportive environment for employees with disabilities. We ensure reasonable adjustments are made and promote a culture of understanding and respect towards disability.

7. GENDER REASSIGNMENT

Gender reassignment discrimination happens when you are treated less favourably because you are transitioning, have transitioned, or are perceived to be transitioning. This can include derogatory comments, exclusion from activities, or refusal to use correct pronouns. We are committed to supporting employees undergoing gender reassignment by fostering an inclusive and respectful environment. We ensure that all employees are treated with dignity and respect, regardless of their gender identity or expression.

8. MARRIAGE OR CIVIL PARTNERSHIP

Discrimination occurs when someone is treated unfairly because they are married or in a civil partnership. This can include unequal benefits or differential treatment in the workplace. We are committed to ensuring that employees are not treated differently or less favourably due to their marital status or civil partnership. We provide equal benefits and opportunities to all employees, regardless of their marital status.

9. PREGNANCY & MATERNITY

Pregnancy and maternity refer to the condition of being pregnant or the period after childbirth. Discrimination occurs when you are treated unfavourably because of being pregnant, on maternity leave, or have recently given birth. This can include unfair dismissal, denial of promotions, or exclusion from training opportunities. We are dedicated to supporting pregnant employees and new parents by providing a supportive environment and ensuring their rights are protected during pregnancy and maternity leave.

10. RACE

Race defines your colour nationality and ethnic or national origin. Discrimination can occur if you are subjected to racial slurs, exclusion from opportunities or biased decision-making. We are committed to promoting racial equality by fostering a diverse and inclusive workplace where all employees are respected and valued.

11. RELIGION OR BELIEF

Religion or belief refers to a wide range of religious and philosophical beliefs. Discrimination occurs when someone is treated unfavourably because of their religious beliefs or lack thereof. This can include exclusion from activities, mockery of beliefs, or refusal to accommodate religious practices. We are committed to respecting and accommodating the religious and philosophical beliefs of all employees, fostering a culture of tolerance and inclusion.

12. GENDER

Gender discrimination can occur if you are treated unfairly on the basis of whether you are male or female. This can include unequal pay, exclusion from opportunities, or harassment. We are committed to promoting gender equality and preventing sex discrimination in the workplace. We ensure that all employees are treated fairly and have equal access to opportunities regardless of their gender.

13. SEXUAL ORIENTATION

Sexual orientation discrimination can include exclusion from opportunities, derogatory remarks, or denial of equal treatment and benefits. We are committed to fostering an inclusive and respectful workplace environment where all employees, regardless of their sexual orientation, are treated with dignity and respect. Our policies and practices are designed to ensure equality and prevent any form of discrimination based on sexual orientation.

14. RECRUITMENT AND SELECTION

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. Shortlisting and interviewing should be done by more than one person where possible to ensure non-biased judgment, promote diverse perspectives, and enhance the fairness and objectivity of the selection process. Our recruitment procedures will be reviewed regularly to ensure that individuals are objectively assessed on the basis of their relevant merits and abilities.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. They should include a short policy statement on equal opportunities and the employer's commitment to diversity, equity and inclusion in the workplace and state that a copy of this policy will be made available on request.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic.

Job applicants should not be asked about health or disability before a job offer is made.

We are required by law to ensure that all Employees are entitled to work in the UK.

15. DISABILITIES & REASONABLE ADJUSTMENTS

If you have a disability or become disabled, we encourage you to speak with the People Team at people.team@gpg.international or your manager to help us understand more about your condition so that we can look at what support may be available to you. This will include considering any appropriate reasonable adjustments that would help you overcome or minimise any difficulty experienced as a consequence of the disability.

16. MENOPAUSE IN THE WORKPLACE

We are committed to fostering an inclusive and supportive workplace for all employees and recognise that menopause is a significant and natural phase in many employees' lives, and we are dedicated to raising awareness and encouraging open discussion about menopause.

We aim to provide training and resources to educate our staff about menopause, its symptoms, and its potential impact on your professional and personal lives. We encourage open and respectful dialogue about menopause in the workplace, allowing you to discuss your needs and seek support from your line manager and or The People Team without fear of stigma or discrimination. Reasonable adjustments to the work environment or practices will be considered to support anyone experiencing menopause, which may include flexible working arrangements, adjustments to the physical workspace, or access to rest areas. Any discussions regarding menopause will be handled with the utmost confidentiality and sensitivity, ensuring that you feel respected and supported. By integrating this clause into our Diversity, Equity, and Inclusion Policy, we aim to create a workplace where everyone feels valued and supported, regardless of their life stage.

17. PART-TIME AND FIXED-TERM WORK

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

18. ACTING ON DISCRIMINATORY BEHAVIOUR

In the event that you feel you are subject to, or witness discriminatory behaviour, please refer to the Anti-bullying and Harassment Policy for more information on the steps you should follow. If you would like to raise a complaint, please refer to the Grievance Policy.

You can also discuss any concerns with the People Team or your manager.

Although we appreciate it may be difficult to do so, we do encourage all employees to report any wrongdoing, regardless of their relationship with the employee involved or their seniority.

19. ADVICE AND SUPPORT ON DISCRIMINATION

There are a number of ways employees can access advice or support on matters concerning discrimination. These include:

1. Speaking to the People Team or their Manager.
2. Contacting one of our Mental Health First Aiders at wellbeing@gpg.international
3. Contacting Safecall (an independent and confidential service) on 0800 915 1571,

There are also some useful contacts within the FAQ section below (Appendix A).

20. REVIEW OF THIS POLICY

The Company reserves the right to review and amend this policy from time to time.

21. BREACHES OF THIS POLICY

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination and victimisation may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered harassment, bullying or discrimination, or witnessed it happening to someone else in the workplace, you can raise the matter through our Grievance Procedure and through our Anti-bullying and Harassment Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against anyone who complains about or reports discrimination. If you believe you have been victimised for making a complaint or report of discrimination or have witnessed it happening to someone else in the workplace, you should raise this through our Grievance Procedure.

We encourage the reporting of all types of potential discrimination, as this assists us in ensuring that diversity, equity, and inclusion principles are adhered to in the workplace. However, making a false allegation in bad faith, or that you know to be untrue, will be treated as misconduct and dealt with under our Disciplinary Procedure.

22. REFERENCES

Legislation, regulation, and guidance from external organisations, including:

- Equality Act 2010
- Equality and Human Rights Commission

Related internal policies and procedures:

- Anti-Harassment and Bullying Policy
- Grievance Policy and Procedure
- Disciplinary Policy and Procedure
- Code of Conduct Policy
- Corporate Social Responsibility Policy
- Health and Safety Policy
- Preventing Sexual Harassment Policy

FREQUENTLY ASKED QUESTIONS

Q. What is defined as a Protected Characteristic?

A. A protected characteristic refers to the characteristic of a person (or the characteristic that a person is perceived to have or is associated with) and includes the following:

- Age
- Disability, including people with a cancer diagnosis
- Gender reassignment, including gender identity
- Marriage and civil partnership
- Pregnancy and maternity
- Race, including colour, nationality (including citizenship), ethnic or national origins
- Religion and belief, including philosophical belief and lack of belief
- Sex
- Sexual orientation.

Q. What is discrimination by association?

A. Discrimination by association is treating someone less favourably because they are associated with a person with a Protected Characteristic. For example, where a person is treated less favourably because of their association with an individual with a Protected Characteristic.

Q. What is perception discrimination?

A. Perception discrimination occurs when a person is treated less favourably because of the mistaken belief that they possess a Protected Characteristic. An employee can successfully pursue a claim for harassment on the basis their sexual orientation after being subjected to unwanted joke suggested that they are homosexual, even if they are not homosexual.

Q. What is a provision, criterion, or practice ("PCP") that could lead to a complaint of indirect discrimination?

A. A PCP is a rule or policy that will have a greater impact on a people with a Protected Characteristic than people without. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

Q. Is the menopause a protected characteristic under the Equality Act 2010?

A. The menopause itself is not specifically listed as a protected characteristic under the Equality Act 2010. However, employees experiencing menopause can be protected under the Act in several ways.

Menopause-related symptoms can lead to discrimination claims on the grounds of sex, age, or disability, which are protected characteristics. For example, if a woman is treated unfairly because she is experiencing menopause symptoms, it could be considered direct sex discrimination. Additionally, if an employer fails to make reasonable adjustments for severe menopausal symptoms, it might constitute disability discrimination.

Q. When can I ask an applicant about their health or disability?

A. Applicants should never be asked about their health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example:

- to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments),
- to see if any adjustments might be needed at interview because of a disability,
- Positive action to recruit disabled persons,
- Equal opportunities monitoring provided that it will not form part of the selection or decision-making process.

Where necessary, job offers can be made conditional on a satisfactory medical check, but this will need to be justified, discuss, and approved by the People Team.

Q. Will I be asked to complete an Equal Opportunities Form?

A. Yes. To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, nationality, gender, gender identity, disability, sexual orientation, religion, and age as part of the recruitment procedure. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment, or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy and in accordance with data protection legislation and our Data Protection Policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality, diversity, and inclusion.

Q. Can I ask a job applicant if they have a family or are planning to have a family in the future?

A. Applicants should not be asked about their family or caring arrangements or whether they are pregnant or planning to have children.

Q. Which applicants need to provide right-to-work information?

A. All prospective Employees, regardless of nationality, must be able to produce original documents (such as a passport) showing their right to work in the UK before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the People Team or UK Visas and

Immigration. Assumptions about immigration status should not be made based on appearance or apparent nationality.

Q. How often is the DEI policy reviewed?

A. The DEI policy is reviewed annually to ensure it remains relevant and effective. Changes to legislation, organisational developments, or feedback from employees may also prompt a review and update of the policy.

Q. What will you do if I report my health problems or disability?

A. We will deal with this information confidentially and will use it wherever needed to enable us to make reasonable adjustments and facilitate your continued employment

Q. What kind of adjustments will you make to help me if I declare a disability?

A. We are committed to providing reasonable adjustments to support employees with disabilities. Employees are encouraged to discuss their needs with their manager or the People Team to ensure appropriate support is provided.

Adjustments may include:

- Making adjustments to premises to improve access, where possible;
- Re-allocating some duties to other employees;
- Flexible working;
- Transferring to a new role;
- Relocating to a more suitable office;
- Giving time off work for medical treatment or rehabilitation;
- Providing additional or targeted training or mentoring;
- Supplying or modifying equipment, instruction, and training manuals; or
- Any other adjustments the Company considers reasonable and necessary, provided such adjustments are justified and proportionate.

Q. What are the details of some useful external contacts?

A. **Equality Advisory Support Service**

Telephone: 0808 800 0082

Website: https://www.equalityhumanrights.com/en/contact-us/equality-advisory-and-support-service

Safecall

Telephone: 0800 915 1571

Website: https://www.safecall.co.uk/en/contact/

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