Equity, Diversity and Inclusion Policy - SP36

Statement of intent

Introduction

This policy applies to all of the legal entities listed in the SP100 Business Entities document who shall be referred to in this policy as “We/Our/Us”.

Scope

The purpose of this policy is to set out Our approach to equity, diversity and inclusion. Our aim is to encourage and support equity, diversity 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.

This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

Our Commitments

We are committed to 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. As part of Our zero-tolerance approach to discrimination in any form, you and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation or any other protected characteristic prescribed by law (Protected Characteristics). We are also committed to providing equitable treatment to all those We deal with as an organisation, including customers and suppliers.

We will take all reasonable steps to:

- Promote awareness and provide training to all staff and all managers on all aspects of equality and diversity in the workplace.
- Apply the principles of equity to all staff and all job applicants so that there is equality of opportunity. Our aim is that no individual is denied employment opportunities for reasons unrelated to ability.
- Establish programmes and processes that ensure a diversity of candidates at all career stages beginning with recruitment, including the development and promotion of talent through to the appointment of senior leadership.
- Implement all internal policies and procedures (on a fair and impartial basis).
- Create an inclusive working environment that is sensitive to the needs of staff of differing cultures, religions and beliefs. For example, in connection with festivals, religious observance and dress.
- Make reasonable adjustments to enable employees with disabilities to function effectively and to their full potential.
- Ensure that all work environments are free from all forms of discrimination, harassment, intimidation or bullying.
- Monitor how this policy is working in practice.

Status of the Policy & Who is Responsible for the Policy

Whilst Our Executive Team has overall responsibility for the effective operation of this policy, the responsibility for overseeing its implementation is delegated to the Head of the People Team. Suggestions for changes to this policy should be reported to the Head of the People Team, with questions about the day-to-day application of this policy being referred to the relevant line manager in the first instance. This policy is reviewed regularly and updated where appropriate.

Discrimination and Definitions Used in the Policy

You must not unlawfully discriminate against, or harass other people, including current and former staff, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts or when wearing a work uniform), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

(a) ***Direct discrimination***: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or sexual orientation. Direct discrimination can include associative discrimination, where a person is treated less favourably because of their association with an individual with a Protected Characteristic, and perception discrimination, where a person is treated less favourably because of the mistaken belief that they possess a Protected Characteristic.

(b) ***Indirect discrimination***: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. 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.

(c) ***Harassment***: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-bullying and harassment Policy.

(d) ***Victimisation***: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.

(e) ***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.

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 should be done by more than one person and with the involvement of the People Team, where possible. Our recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

Vacancies should generally be advertised to a diverse section of the labour market by using a variety of social media channels as well as using recruitment agencies which provide a diverse range of suitable candidates. 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 our 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. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the People Team.

Where necessary, job offers can be made conditional on a satisfactory medical check.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the People Team.

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. Analysing this data helps Us take appropriate steps to avoid discrimination and improve equality, diversity and inclusion.

Training and Promotion and Conditions of Service

Training needs will be identified through regular appraisals. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

Termination of Employment

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Disabilities

If you are disabled or become disabled, We encourage you to tell Us about your condition so that We can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager or the People Team may wish to consult with you and your medical adviser about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If We consider a particular adjustment would not be reasonable, We will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, We will take reasonable steps to improve access.

Part-time and Fixed-term Work

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

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 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 or 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 staff who complain about, or report 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 the procedure set out in this policy.

We encourage the reporting of all types of potential discrimination, as this assists Us in ensuring that equity, diversity 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.

Related Policies

This policy is supported by the following other policies and procedures:

(a) Anti-bullying and harassment Policy
(b) Grievance Policy
(c) Disciplinary – conduct capability Policy
(d) Flexible Working Policy
(e) Maternity leave Policy
(f) Paternity leave Policy
(g) Adoption leave Policy
(h) Parental Leave Policy
(i) Shared Parental Leave Policy
(j) Time Off for Dependants Policy

Matt Robinson
Chief Financial Officer
14th April 2026