

## **Equality and Diversity Policy**

### **Policy Statement**

### **Contents**

- Introduction
- Objectives
- Scope
- Principles
- Policy Framework
- Responsibilities
- Complaints
- Definitions

### **Introduction**

Western Electric Contractors Limited is committed to providing an environment free from discrimination, bullying, harassment or victimisation, where all employees are treated equally with dignity and respect. All job applicants, employees and others who work for us will be treated fairly with equal opportunity for all. Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equality and fair treatment in employment.

### **Objectives**

The aim of this policy is to communicate the commitment of the Managing Director, Directors and Senior Management team to the promotion of equality and diversity within Western Electric Contractors.

### **Scope**

This policy applies to all those who work for (or apply to work for) the Company. The principles of non-discrimination and equality of opportunity also apply to the way in which employees should treat each other, visitors, contractors, sub-contractors, service providers, suppliers and any other persons associated with the functions of WEC. This policy relates to all aspects of employment including individual standards of behaviour, the advertisement of jobs, recruitment and selection, training and development, performance development, pay, promotion and transfers, provision of benefits and leaving the organisation.

### **Principles**

The Equality Act 2010 defines the following as 'protected characteristics':

- Age
- Disability
- Sex
- Sexual orientation
- Race
- Religion or belief
- Gender reassignment
- Marriage or Civil Partnership
- Pregnancy and Maternity

## Equality and Diversity Policy

WEC is committed to and strives to ensure that every individual who works for the company, or who applies to work for it (providing that they have a legal right to work in the UK), will be treated fairly and equally valued regardless of their protected characteristics or other circumstances, including: social and employment status, HIV status, or trade union/non-trade union membership. We aim to create an inclusive working culture where differences are not merely accepted, but valued; where employees feel involved, respected and connected to our success. WEC will not discriminate unlawfully against customers, or clients using or seeking to use goods, facilities or services provided by the Company.

The Managing Director, Directors and Senior Management team recognise the value of equality, diversity and an inclusive working environment. They will work for the aims of this policy, best practice and equality legislation to deliver a positive working environment for all staff. WEC will encourage the organisations within which it operates to work in the spirit of this policy. Breaches of this policy will be dealt with appropriately and may lead to legal and / or disciplinary action, which may result in dismissal.

### General Policy Framework

WEC expect all employees to comply with the content of this policy. The impact of any behaviour is the important element in allegations of breaches of equality and diversity policy and legislation, not the intent. It is no defence for employees to say that they did not intend their behaviour to cause offence, or to blame the recipient for being over sensitive. The value of equality and diversity will be covered in all company induction sessions.

### Policy Implementation

In order to implement this policy, we will:

- Avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.
- Appoint, train, develop and promote on the basis of merit and ability to do the job.
- Communicate the policy to employees, job applicants and relevant others (such as contract or agency workers).
- Obtain commitments from other persons or organisations such as subcontractors or agencies that they too will comply with the policy in their dealings with our Company and our workforce.
- Ensure that those who are involved in assessing candidates for recruitment or promotion are fully aware of the content of the Company's Equality and Diversity policy.
- Provide guidance to all existing and new employees, line managers and others engaged to work at WEC to help them understand their rights and responsibilities under this policy and what they can do to help create a working environment free of bullying and harassment.
- Provide training to managers as may be appropriate to enable them to deal more effectively with complaints of bullying and harassment.
- Make reasonable adjustments in cases of disabled employees where it is reasonable and possible to do so in order to ensure that they do not suffer a disadvantage in the workplace.
- Incorporate equal opportunities notices into general communications practices (e.g. staff newsletters, intranet).
- Monitor the ethnic, gender and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these

## Equality and Diversity Policy

groups, and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

- Review its effectiveness and take action as necessary.

### Legal Obligations

There is legislation in place which protects individuals against direct discrimination, indirect discrimination, harassment (including bullying) and victimisation because of their protected characteristic or other circumstances, including, social and employment status, HIV status, or trade union/non trade union membership. The principles which underpin such legislation are extended to all employees regardless of any personal characteristic. Employees can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

### Responsibilities

#### *Employees*

All employees have responsibility for adhering to and practicing this policy and should:

- Co-operate and comply with the policy to ensure equality of opportunity;
- Not discriminate in the course of their duties nor induce or attempt to induce others to do so;
- Not victimise, harass or intimidate anyone on account of their protected characteristic or other circumstances, including, social and employment status, HIV status, or trade union/non trade union membership;
- Inform their manager or a member of the HR team if they suspect that discrimination is taking place
- Co-operate fully with any Company investigation into a complaint under this policy

#### *Managers*

All Managers should:

- Lead by example by promoting equality of opportunity and challenging discriminatory conduct;
- Ensure the policy is implemented in their area of delivery;
- Expect their staff to do their best to promote equality of opportunity;
- Ensure that staff are aware of this policy and should they become witness to, or aware of any breach, of this policy, they must report it immediately to their line manager or a member of the HR department.
- Identify and highlight any examples of actual or potential unjustifiable discrimination within the limitations of legislation to the HR department;
- Deal with breaches to this policy promptly, sensitively and confidentially.

#### *The HR Department*

The HR Department will:

- Be responsible for reviewing and monitoring the effectiveness of this policy;
- Provide advice and guidance to staff and managers;
- Ensure that all complaints and alleged breaches of this policy are dealt with seriously, sensitively, confidentially and in a timely manner.

### Complaints

## Equality and Diversity Policy

Any individual who believes that an act in breach of this policy has taken place should raise the issue as soon as possible with the individual concerned, their line manager or a member of the HR team.

If the complaint is against an individual's line manager then the individual should raise the issue as soon as possible with their line manager's manager or with a member of the HR team.

All complaints will be dealt with seriously in line with the Grievance Procedure and WEC will seek to resolve any grievance that it upholds. If a complaint involves bullying or harassment, the grievance procedure is modified. Where complaints are upheld against employees this may lead to legal and / or disciplinary action, and may result in dismissal without notice.

You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Any queries or concerns about the application of this policy should be referred to the Human Resources Department.

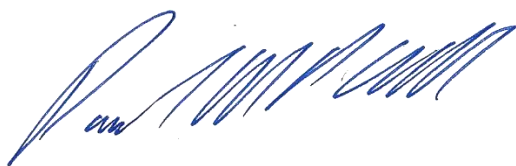
### Definitions

#### Term Definition

Equality	Treating all people equal regardless of personal characteristics
Diversity	Recognising, valuing and using the differences which people have
Direct Discrimination	Treating a person less favourably because of a particular characteristic covered by discrimination legislation.
Indirect Discrimination	Applying criteria or practice equally to all people but which has the effect of disadvantaging a group of people covered by discrimination legislation and has a detrimental impact on an Individual.
Harassment	Unwanted conduct, real or perceived, that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them.
Bullying	A form of harassment which may be related to an abuse or misuse of power.
Victimisation	Treating a person less favourably because they have or intend to make a complaint or allegation or has given evidence in relation to a complaint.
Protected Characteristics	Age, disability, gender reassignment, marriage and civil partnership in respect of eliminating unlawful discrimination, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief (this includes lack of belief) sex, sexual Orientation

## Equality and Diversity Policy

Associative Discrimination	Treating a person less favourably because of their association with a person(s) who has a particular characteristic covered by discrimination legislation
Perceptive Discrimination	Treating a person less favourably based on a perception that they have a particular protected characteristic covered by discrimination legislation
Third Party Harassment	Occurs where an employee is harassed (and the harassment relates to a protected characteristic) by third parties such as customers and clients. Failure to make reasonable adjustments where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer fails to make reasonable adjustments to enable them to overcome the disadvantage.
Inclusion	A sense of belonging, feeling respected, valued for who you are; feeling a level of support and commitment so that you can do your best.



Paul Cull - Managing Director

Date: - 1<sup>st</sup> July 2022