



EQUALITY, DIVERSITY AND INCLUSION POLICY

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Responsible Person – Equality, Diversity and Inclusion Manager
Signatory – Group HR Director



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Policy statement

RSK Group Ltd is committed to promoting equal opportunities for all employees and applicants and opposes all forms of unlawful or unfair discrimination in relation to a protected characteristic i.e. age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership or pregnancy and maternity (this list is not exhaustive).

CAN are part of the RSK Group, and also applies this policy to its learners covered under the NOCN Centre Recognition Application to delivery certain qualifications. Any reference to “all employees” and “no employees” should be read to include these learners.

This policy is designed to assist the Company in promoting equality and diversity among its workforce to ensure that individuals are treated fairly. As a company we recognise that every employee has a basic right to enjoy a working environment that promotes dignity and respect, and where individual differences and contributions of employees are recognised and valued equally.

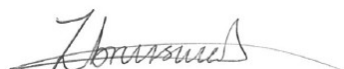
The policy applies to all employees whether part time, full time or temporary and job applicants (both internal and external). It is also expected that our customers / clients, suppliers and contractors will take measures, as far as is reasonably practical, to maintain the principle of equality for all.

The policy has been designed to ensure:

- All employees, job applicants and clients are treated fairly, openly and honestly, and with dignity and respect;
- No employee or job applicant is discriminated against on the grounds of a protected characteristic;
- Equality and Diversity is promoted and celebrated in the working environment;
- Training and development opportunities are open to all employees;
- Any breaches of the policy are taken seriously and treated with sensitivity.

Furthermore, the organisation will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective.

The measures used by the company to implement this policy have been devised based on information from the Equalities and Human Rights Commission (EHRC). It is our duty as an employer to comply with all legislation regarding equality at work and to provide training to managers and all other employees about their rights and responsibilities under the Equality, Diversity and Inclusion Policy. It is the responsibility of each employee to also uphold the principles set out in this statement.



Group HR Director
April 2022

Responsibility

Achieving an equal opportunities and diverse workplace is a collective task shared between the employer and all its employees. This policy and the rules contained in it, therefore apply to everyone irrespective of seniority, tenure or working hours.

All employees have personal responsibility to ensure compliance with this policy, to treat colleagues with dignity at all times and to not discriminate against or harass other employees, visitors, clients, customers, suppliers and former employees.

In addition, the directors, HR department and line managers have particular responsibility for:

1. Setting the standards of acceptable behaviour expected of employees and acting with fairness and equality;
2. Ensuring the company's equality, diversity and inclusion policy is implemented throughout their areas of responsibility;
3. Ensuring all employees in their teams are aware of their responsibilities under the policy;
4. Acting fairly and consistently when dealing with requests under this policy;
5. Ensuring all records of employment decisions are kept and uploaded onto RSK systems;
6. Collecting and submitting information on job applicants and employees for monitoring purposes;
7. Promoting a culture of equality of employment amongst their teams.

Employees have particular responsibility for:

1. Co-operating with measures to ensure equality;
2. Ensuring they do not discriminate unfairly, abuse, harass, intimidate, disadvantage or victimise any other employee or third party;
3. Informing their manager if they suspect unfair discrimination is taking place in the company.

Types of Discrimination

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

Direct Discrimination: treating someone less favourably because of a protected characteristic.

Indirect Discrimination: providing less favourable treatment that puts a particular employee at a disadvantage.

Harassment: 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 the RSK Bullying and Harassment Policy and on-line training module.

Victimisation: retaliation against an employee who has complained or has supported another employee's complaint about discrimination or harassment.

Disability Discrimination: Treating someone less favourably and failing to make reasonable adjustments because of something arising as a consequence of their disability.

In exceptional circumstances, employers can discriminate against an individual for a reason related to a protected characteristic where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim. For more information please contact the HR Department.

Framework

Communication

As a highly diverse organisation, we recognise the importance of embracing diversity across the business. We openly encourage a workforce that provides new and innovative ways of thinking and a culture where employees are able to voice their concerns or suggest alternative ways of working.

Recruitment and Selection

It is our commitment that we will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and redundancy. All promotion and rewards will be decided solely on the basis of performance.

Job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary and only if there is a justified requirement for the role.

We will also take all reasonable and practical steps to ensure that disabled applicants are able to participate on an equal basis with applicants who are not disabled.

We are required by law to ensure that all employees are eligible to work in the UK. Assumptions about immigration status should not be 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. Further details are outlined in the RSK Recruitment Policy.

Religious Observance

As a multi-cultural organisation with many religions and beliefs represented, we understand that at certain times some individuals may need to request time off or use facilities for religious observance. We recognise that this is extremely important to employees and although the company is not obliged to, wherever possible, we will try to accommodate such requests.

Please note that sufficient notice should also be provided when making such requests in order for them to be considered and alternative arrangements made if necessary. It may be necessary to refuse some requests on the grounds of health

and safety or where the business would be unable to operate effectively, resulting in the detriment of business operations. We will ensure that any requests are taken into consideration and alternatives sought wherever possible, however individuals must be aware that this may not always be possible.

Flexible Working Requests

Our aim is to be inclusive and we are committed to operating a fair and consistent approach to all flexible working requests, in line with legislative requirements and in consideration of business needs. We will consider any requests for variations and will only refuse such requests if we have valid business reasons, unrelated to any protected characteristics, for doing so.

Dealing with non-compliance

Any breach or failure to comply with this policy will be taken seriously and may result in disciplinary action against the offender with the highest sanction being immediate dismissal.

Any employee may complain about discriminatory conduct under the company's grievance procedure. If the matter relates to harassment then the grievance may be raised directly with the HR department. No individual will be penalised for raising such a grievance unless the substance of the grievance is untrue or the grievance is made in bad faith, for example out of malice.

All employees have a responsibility to combat discrimination if they encounter it. Anyone who observes any such incidents or is aware of acts that they believe amount to discrimination directed at others, are encouraged to report these to the HR department immediately.

Where an employee is falsely accused of discriminatory conduct, then he or she may instigate the company's grievance procedure. In this instance, the person who made the false accusation may be subject to disciplinary action. In serious cases, such behaviour may be deemed to constitute gross misconduct and may result in summary dismissal, in the absence of mitigating circumstances.

RSK will take disciplinary action in accordance with our disciplinary procedures where there is evidence of discriminatory conduct, harassment or victimisation. Any grievance or report about discrimination will be kept confidential as far as is practicable. Permission may be requested to put any such complaint(s) to the alleged discriminator if disciplinary action appears to be appropriate. It sometimes may be necessary to disclose the complaint or take action even if this is not in line with the individual's wishes, but the company will seek to protect the individual from victimisation and, if they wish, seek to protect their identity. Disciplinary action may be impossible without the required co-operation or if there is refusal to allow relevant information to be disclosed.

In certain situations, it may be necessary to ask the complainant to stay at home on paid leave while investigations are being conducted and the matter dealt with through the appropriate procedure. This may be particularly necessary in cases of alleged harassment.

Employees should also be aware that in some cases, they may be personally liable for their acts of discrimination, that legal action may be taken against them directly by the victim of any discrimination and it may be considered a criminal offence to intentionally harass another employee.

Monitoring

All employees and job applicants will be asked to complete a range of equality and diversity questions when either applying for a job role at the company or upon joining the company. Information will be collated securely and confidentially through RSK's online HR system and will be used solely for monitoring the effectiveness of this equality policy.

In particular, the Company may monitor the ethnicity and gender of job applicants, along with disability status.

Employees who are disabled, or who become disabled during the course of their employment, will be encouraged to provide information about their condition so that the Company can offer appropriate support. All reasonable adjustments will be considered to ensure disabilities are accommodated within the workplace without causing any detriment to the needs of the business.

Should inequalities become apparent, positive action, if appropriate, may be taken to redress the imbalance.

The HR department will monitor the application of this policy to ensure that it is being applied fairly and consistently across the company.

Complaints

Any complaints regarding the operation of this policy should be communicated to the HR Director.

Review

This policy will be reviewed annually in April or when changes to legislation apply.