



Equality, Diversity & Inclusion Policy

<u>Classification</u>	
Public	
Internal	
Restricted	
Confidential	
Commercial in Confidence	✓

Issue Number	Policy Owner	Authorised By	Date Reviewed	Next Review Date
1	HR	L Sampson	September 2024	September 2026

Contents

Policy Statement	3
1. Objectives of this policy.....	3
2. Types of Discrimination.....	3
3. Responsibility	5
4. Implementation.....	5
5. Procedure	6
6. Data Protection	7

Policy Statement

EA Technology (the Company) is committed to a policy of encouraging equality, diversity and inclusion among its workforce and eliminating unlawful discrimination in its employment practices. It will ensure that no job applicant or employee receives less favourable treatment on the grounds of race, colour, nationality, ethnic or national origins or on the grounds of sex or marital status, age, disability, gender reassignment, sexual orientation, religion and belief, maternity or pregnancy (the '**protected characteristics**'). Individuals will be selected, promoted and treated on the basis of their abilities and merits and according to the requirements of the job and will be given equal opportunity to show their ability and to progress within the organisation.

EA Technology is also committed to the equal treatment of customers using or seeking to use goods, facilities or services we provide. We believe that all employees and clients are entitled to be treated with respect and dignity. This includes, but is not limited to, management, employees, trainers, employers, apprentices, delegates and stakeholders.

This policy does not form part of your employment contract and we may update it at any time. Any such changes will be reviewed with the Union prior to implementation.

1. Objectives of this policy

The Company is committed to a working environment that offers equal treatment and equal opportunities for all its employees, so that every employee is able to progress to their full potential. The main objectives of this policy are:

- To prevent, reduce and stop all forms of unlawful discrimination in line with the Equality Act 2010
- To ensure that recruitment, promotion, training, development, assessment, benefits, pay, terms and conditions of employment, redundancy and dismissals are determined on the basis of capability, qualifications, experience, skills and productivity
- To encourage its employees to take an active role against all forms of harassment and discrimination
- To deter employees from participating in harassment and discriminatory behaviour
- To demonstrate to all employees that they can rely upon the Company's support in cases of harassment and discrimination at work
- To achieve equality for all employees, delegates/apprentices and to support diverse circumstances and needs in all aspects of training, learning and support

2. Types of Discrimination

Direct Discrimination

This occurs when a person or a policy intentionally treats a person less favourably than another because of a protected characteristic. Direct Discrimination can occur even when unintentional.

Indirect Discrimination

This occurs when the application of a policy, provision, criterion or practice which the employer applies to all employees puts an individual at a particular disadvantage as compared to others due to a protected characteristic if it cannot be objectively justified. An example of this would be a requirement for a recognised qualification in English as criteria for selection, as this would impact on individuals educated overseas and may not be justified if they show a reasonable level of literacy adequate for the job.

Harassment

This occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment in relation to a protected characteristic is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Further details can be found in the EA Technology Harassment and Bullying policy.

Victimisation

This occurs when a person is treated less favourably because they have complained or given information about discrimination or harassment supported a colleague in their complaint.

Disability Discrimination

Disability for the purposes of the discrimination legislation means any mental or physical impairment which has a substantial and long-term adverse effect on an individual's ability to carry out day-to-day activities. An impairment is long-term if it has lasted for at least 12 months or can reasonably be expected to last for at least 12 months or is likely to last for the rest of the life of the person affected.

If you are disabled, or become disabled, we encourage you to inform your Line Manager, HR and the Health and Safety Manager about your condition so that we can support you as appropriate. This may involve consulting with you and your medical advisors about possible reasonable adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If, after consideration, a particular adjustment would not be reasonable, you will be made aware of our reasons for making that decision and try to find an alternative solution where possible.

Less favourable treatment because of a person's disability amounts to direct discrimination which is unlawful. For example, a Manager who is prejudiced against those with a mental impairment and as a result treats them less favourably than others, directly discriminates on grounds of disability. This sort of discrimination will not be justified.

Less favourable treatment for a reason arising from a disability (rather than the disability itself) does not amount to discrimination if it can be justified as a proportionate means of achieving a legitimate aim. For example, training for a position that requires physical strength may justifiably be refused for an employee who, because of a disability, does not have the prerequisite strength. The reason the training was refused was not the disability itself, but a reason related to the disability – i.e. physical strength.

Where any feature of the Company's premises or any arrangements made in relation to employees' working conditions places an employee at a disadvantage because of a disability that person has, the Company is under an obligation to make such adjustments to the premises or working conditions as are reasonable to avoid that disadvantage.

For example, if it is practicable to do so, ramps will be provided for wheelchair users to ensure they have access to all areas of the premises they may wish to visit. Lifts are available to facilitate access all floors of the Company's premises. Aids may be available for those who are visually impaired or have hearing difficulties.

We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and service users.

3. Responsibility

All management, employees, trainers, employers, apprentices and delegates have responsibility for their personal application of this policy. The Company will view any acts of discrimination very seriously and such actions will be liable to formal disciplinary action under the Company's Disciplinary Procedure.

The principle of non-discrimination and equality of opportunity also apply to the way in which our employees treat visitors, clients, customers, apprentices, suppliers and former staff members.

The Leadership Team has a responsibility for ensuring that this policy is disseminated to all employees and applied within their individual business areas and will give full backing to all those who endeavour to carry it out.

4. Implementation

Implementing Equality, Diversity and Inclusion is an ongoing process that will be regularly reviewed by the Leadership Team.

All employees will be made aware of the Equality, Diversity and Inclusion Policy during the induction process and additional/refresher training will be provided on a regular basis.

All marketing and support materials will encourage applications and enquiries from all areas of the community for positions within the Company and for enrolment onto all EA Technology qualifications and training courses.

Training, advice, guidance and support will be provided to ensure that all employees, trainers, delegates and apprentices understand their duties and obligations in law.

The Company will protect the confidentiality of disclosed sensitive matters related to equality and diversity where this does not affect the health & safety of others or does not have criminal implications

The Company will take all appropriate disciplinary or legal action to protect employees, trainers, apprentices and delegates from any discriminatory behaviour, verbal or physical, by any individual or groups from within or outside EA Technology.

Any form of harassment of individuals, groups of employees, apprentices or delegates, on any discriminatory grounds is viewed as a serious disciplinary offence, potentially gross misconduct, and therefore renders the person carrying out such anti-social actions liable to summary dismissal, even on the first occasion. Please refer to EA Technology Disciplinary and Grievance Procedures and Harassment and Bullying Policy.

5. Procedure

What to do if you consider you are the victim of discrimination or harassment

The Grievance Procedure and Harassment and Bullying Policy are available to employees but in the first instance, it may be preferable to seek advice from your Line Manager or HR. Sometimes an informal discussion with the person responsible may resolve the matter. If it does not, you should put your concerns in writing to your Line Manager or HR who will investigate the complaint and attempt to reach a resolution of the matter.

The Company will treat seriously and take prompt action against any employee, apprentice, delegate or stakeholder whose grievance concerns discrimination, harassment or bullying on any prohibited ground. It will not be assumed that a person who complains on these grounds is being over-sensitive.

If any employee considers he or she has a grievance as a result of discrimination or harassment on any prohibited ground, he or she should discuss the matter with their Line Manager or HR. The Line Manager or HR will then carry out such investigation or arrange for such investigation to be carried out as he or she considers appropriate, bearing in mind the need to keep such complaints confidential.

If any individual employee is accused of discriminatory behavior or harassment or bullying on any prohibited ground, that employee may be suspended on full pay during the investigation. Full details of the complaint must be given to such employee, who must be given an opportunity to answer the complaint under the normal Disciplinary procedure. Following such investigation, The Company may:

- If the complaint is against an employee, try to resolve the situation amicably, bearing in mind that the complainant and employee may have to continue working together; and/or
- If satisfied that an employee is guilty of a deliberate act of discrimination, take appropriate disciplinary action; and/or if the situation cannot be resolved amicably, and it is not thought that disciplinary action is appropriate, transfer either the complainant or those against whom the complainant complains to another area of EA Technology. The complainant will not normally be transferred unless he or she agrees, or it is concluded that the allegation of discrimination was made for some improper motive.
- If the complaint is against a delegate/apprentice, try to resolve the situation amicably, bearing in mind that the complainant and delegate/apprentice may have to continue working together.

Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any person not employed by EA Technology who has a complaint about discrimination or harassment in their dealings with the Company should raise their complaint with HR in the first instance. Discrimination or harassment by EA Technology employees of customers, suppliers, delegates, apprentices, vendors, visitors or others who use or seek to use goods, facilities or services provided by EA Technology will be dealt with through the disciplinary procedure.

6. Data Protection

EA Technology Limited is committed to protecting the privacy and security of personal information in accordance with the Company's General Data Protection Regulation (GDPR) Privacy Notice for Employees, Workers and Contractors (UK) first published in May 2018 and amended from time to time.