



Policies & Statements

# Inclusion Policy

Version 1.2 April 2022  
Policy Reference: POL-PPL-007

Octavius Infrastructure

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**Inclusion Policy**

POL-PPL-007, Version 1.2 April 2022



You MUST contact the People Team before any action is taken under this policy

**1 Key Principles**

- 1.1 Our principles apply to everyone and are supported by a range of complimentary policy documents that direct and guide our work.
- 1.2 We aim to ensure that no job applicant receives less favourable treatment on any of the unlawful grounds listed in this Policy. Our selection procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are essential for the effective performance of the job and therefore justified on non-discriminatory grounds.
- 1.3 We will monitor redundancy selection criteria and procedures to ensure that they are fair and objective and are not directly or indirectly discriminatory. We will ensure that disciplinary procedures are carried out fairly and uniformly for everyone, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.
- 1.4 We care about everyone and will create a working environment that is free from unlawful discrimination, victimisation or harassment and in line with our core values.
- 1.5 We will treat everyone fairly in respect of training and development opportunities and will encourage them to reach their full potential and increase their contribution to an effective service delivery.
- 1.6 All requests will be considered on the basis of the need and relevance to the job being undertaken by the person.

**2 Policy**

- 2.1 We are committed to recognising and encouraging Inclusion. Any form of unfair discrimination, victimisation or harassment is not tolerated.

- 2.2 This includes an individual's protected characteristics, as follows:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex; and
- Sexual orientation

- 2.3 There is an appendix for each of the above detailed protected characteristics.

- 2.4 This policy does not form part of anyone's contract of employment and may be amended at any time.

**3 Inclusion**

- 3.1 Inclusion is about where people's differences are recognised and valued and used to enable everyone to thrive at work. Inclusion aims to take into account every type of diversity, not only the more obvious ones of race, culture and gender. It can include visible and non-visible factors, for instance, your background, beliefs, accent, personality or circumstances. Our aim is to attract, retain and encourage people who bring different ways of thinking and different ways of doing things. This will strengthen our company and, in turn, help us meet customer needs and achieve our business goals.
- 3.2 We are committed to ensuring that the diversity of our people, customers and suppliers is valued, viewed positively and as something to be harnessed for our benefit.
- 3.3 We are committed to ensuring that equal access and opportunity is given to everyone by removing discrimination, intolerance and any other perceived barriers.
- 3.4 We recognise that treating people equally does not mean treating everyone the same. Sometimes it will be necessary to treat some people differently in order for them to experience equal treatment. An example of this is that we will not make assumptions about a disabled person's ability to take part in training or the benefits they will gain.

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**4 Discrimination**

4.1 Occurs when a person is treated less favourably than another person who is in the same or similar position, and the reason for this treatment is not justifiable.

4.2 Discrimination can occur in the following ways:

4.3 **Direct Discrimination** - Direct discrimination occurs if anyone discriminates against anyone else because of a protected characteristic, whether or not they possess that characteristic (except in the case of marital status or civil partnership).

An example of direct discrimination happens if we were to treat you less favorably than someone else. It would be direct discrimination if a driving job was only open to male applicants.

It is unlawful to discriminate against anyone because of the connection with someone who possesses a protected characteristic, or because they are mistakenly perceived to possess a protected characteristic. This is called discrimination by association or perception.

4.4 **Indirect Discrimination** - Indirect discrimination occurs if you were subject to an unjustified provision, criterion or practice (PCP) which puts you at a particular disadvantage because of the PCP which has been applied.

For example, a requirement to have excellent written English may indirectly discriminate against a non-British job applicant.

This definition covers formal requirements, conditions and provisions, as well as informal practices. It also covers gender reassignment and disability.

4.5 **Disability Discrimination** – This occurs if we were to treat you in a detrimental way because of something that is a consequence of a disability.

For example being dismissed with a poor attendance record when the absences were caused by disability.

If anyone is suffering from a disability, we are under duty to make reasonable adjustments for them so that they are not subject to a detriment.

**5 Victimisation**

5.1 Occurs if you were treated less favorably because you carried out a 'protected act', e.g. have alleged that discrimination or harassment has taken place; have presented a claim to an employment tribunal; or have acted as a witness in a discrimination or harassment case. Some examples of victimisation include being labeled as a trouble maker, denied promotion or training opportunities.

**6 Harassment**

6.1 This is unwanted conduct that is associative or perceived which has the purpose of violating a person's dignity or creates an environment that is demeaning, degrading, threatening or hostile. Any breaches will be dealt with under our Bullying and Harassment Policy.

6.2 We can be held liable for the sexual harassment of our people by a third party (for example, someone outside our company). The act extends liability for third-party harassment to all protected characteristics (other than pregnancy/maternity and marriage/civil partnerships) where we may have failed to take responsible steps to prevent it, and provided we know that you have experienced third-party harassment on at least two prior occasions.

6.3 An example of harassment includes any team members commonly making jokes at the expense of the youngest member of the team. If the youngest are constantly being told that they are the youngest or 'wet behind the ears' by colleagues, or discussing someone's gender identity with colleagues.

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### 7 Bullying

- 7.1 This is offensive, intimidating, malicious or insulting behaviour, which involves an abuse or misuse of power through means, intended to undermine, humiliate, denigrate or injure recipients.
- 7.2 Examples of harassment and bullying may also include unwanted remarks, inappropriate jokes or ridicule, unwelcome physical contact, suggestions or demands for sexual favors, racial shunning or comments on sexual orientation.

### 8 Occupational Requirement

- 8.1 In limited circumstances it will be lawful for us to treat people differently if it is an occupational requirement. Where there is a genuine requirement for a particular type of person to do the job, we must be able to justify a sound business reason. This may occur if it is necessary that, for example, an individual of a particular religion is required to do a job.

### 9 Responsibility

- 9.1 Everyone has an individual responsibility for ensuring equality of opportunity and adherence to this policy by respecting the right to work in an environment free from prejudice and discrimination, by behaving in a considerate and sensitive manner and by challenging anyone who falls short of these expectations.
- 9.2 Everyone must ensure that they treat all people that they come into contact with during the course of their work fairly, equally and with respect.
- 9.3 The Managing Director will be the lead role for all our Inclusion issues and for the review and administration of this policy.

### 10 Training

- 10.1 Inclusion training is part of the implementation of the policy. We actively encourage all employees to undertake Inclusion training module 1 in Your Learning. It is a mandatory requirement that employees with management responsibility including those at supervisory level, undertake module 2.
- 10.2 Inclusion awareness for everyone is included in our onboarding curriculum and forms part of the required learning that must be undertaken during the first 3 months of employment.
- 10.3 Inclusion training will be given as and when necessary to reflect changes in legislation and social expectations.

### 11 Breaches of the Policy

- 11.1 If you believe that you may have been discriminated against, you are encouraged to raise the matter through our Grievance Policy.
- 11.2 If you believe that you may have been subject to harassment, you are encouraged to raise the matter through our Bullying and Harassment Policy.
- 11.3 If you are uncertain which applies or need advice on how to proceed, then you should speak with a member of the People Team. If you feel unable to speak to the People Team or your Manager please refer to our Whistleblowing Policy.
- 11.4 Allegations regarding potential breaches of the policy will be treated in confidence and investigated in accordance with the relevant procedure. If you make such allegations in good faith you will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will be dealt with under our Disciplinary Policy.
- 11.5 Anyone who is found to have committed acts of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, may result in summary dismissal.

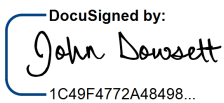
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## 12 Monitoring

12.1 Regular monitoring will be undertaken with training and development, complaints, appeals and harassment cases in order to help identify and address any less favourable treatment and/or inequality.

DocuSigned by:  
  
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### John Dowsett

Chief Executive Officer

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*(Note: this version has the same content as the previous GOL Policy under the same name, reference PT-CP-110 dated 1st August 2021. This version contains minor names changes for the Business and other minor changes to reflect the standalone nature of Octavius).*