



Policies & Statements

Equality, Diversity and Inclusion Policy

Version 3.0, May 2026

Policy Reference: POL-PPL-007

Classification: Public

Equality, Diversity and Inclusion Policy

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1 Key Principles

- 1.1 These principles apply to everyone and are supported by related policies and procedures.
- 1.2 We are committed to ensuring that no job applicant or employee is treated less favourably on any unlawful ground set out in this policy. Recruitment and selection criteria will be based on merit, skills and ability, and reviewed regularly to ensure they are necessary and non-discriminatory.
- 1.3 We ensure that redundancy, disciplinary and other people processes are fair, objective and applied consistently.
- 1.4 We are committed to providing a working environment free from unlawful discrimination, harassment and victimisation, in line with our values.
- 1.5 We provide fair access to training and development and support people to achieve their potential.
- 1.6 Requests for support, adjustments or flexibility will be considered fairly, taking account of individual circumstances and business needs.

2 Policy

- 2.1 We are committed to equality, diversity and inclusion. We do not tolerate unlawful discrimination, harassment or victimisation.
- 2.2 This policy covers the following protected characteristics:
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex; and
 - Sexual orientation
- 2.4 This policy does not form part of any contract of employment and may be amended at any time.

3 Inclusion

- 3.1 Inclusion means recognising, respecting and valuing people's differences so everyone can contribute and thrive at work. This includes visible and non-visible differences such as background, beliefs, communication style and personal circumstances. A more inclusive workplace strengthens our business and helps us meet customer needs.
- 3.2 We value the diversity of our people, customers and suppliers and the different perspectives they bring.
- 3.3 We are committed to removing unlawful barriers to equal access and opportunity.

- 3.4 Treating people fairly does not always mean treating everyone the same. We will consider reasonable adjustments and other appropriate support so people can participate fully and on an equal basis.

4 Discrimination

- 4.1 Discrimination occurs when someone is treated less favourably, or disadvantaged, because of a protected characteristic or for another unlawful reason under equality law. Discrimination can occur in the following ways:

- 4.2 **Direct discrimination** occurs when someone is treated less favourably because of a protected characteristic. This can also include discrimination by association or perception.

For example, refusing to consider a qualified woman for a driving role because of her sex would be direct discrimination.

It is also unlawful to discriminate against someone because of their connection with a person who has a protected characteristic, or because they are wrongly perceived to have one.

- 4.3 **Indirect discrimination** occurs when a provision, criterion or practice applies to everyone but puts people with a protected characteristic at a particular disadvantage, and it cannot be objectively justified.

For example, requiring excellent written English where it is not essential to the role may indirectly discriminate against some applicants.

This can include formal rules, informal practices and workplace expectations.

- 4.4 **Disability discrimination** includes treating someone unfavourably because of something arising from their disability, where this cannot be objectively justified, and failing to make reasonable adjustments.

For example, dismissing someone for disability-related absence without properly considering the circumstances may be unlawful.

We will consider reasonable adjustments where required to remove or reduce disadvantages for disabled people.

5 Victimisation

- 5.1 Victimisation occurs when someone suffers a detriment because they have done, or may do, a protected act, such as making or supporting a complaint of discrimination or harassment.

6 Harassment

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- 6.1 Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Breaches will be addressed under our Bullying and Harassment Policy.
- 6.2 We are committed to taking reasonable steps to prevent sexual harassment at work, including harassment by third parties such as clients, customers, contractors and visitors. We will assess risk, provide clear reporting routes, take concerns seriously and review our controls regularly.
- 6.3 Examples of harassment include age-related insults, repeated comments about someone's gender identity, offensive remarks linked to race, religion, disability or sexual orientation, or other conduct that creates an intimidating or degrading environment.

7 Bullying

- 7.1 Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates or harms someone.
- 7.2 Examples of bullying or harassment may include unwanted remarks, ridicule, exclusion, inappropriate jokes, unwelcome physical contact, or comments of a sexual, racist, homophobic, transphobic or otherwise discriminatory nature.

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 is responsible for supporting equality, diversity and inclusion and for helping to maintain a workplace free from unlawful discrimination, harassment and victimisation.
- 9.2 Everyone must treat colleagues and others they work with fairly, equally and with respect.
- 9.3 The People and Sustainability Director has overall accountability for this policy and its review and administration.

10 Training

- 10.1 Training is a key part of implementing this policy. All

employees are expected to complete Inclusion training module 1 in Your Learning. Module 2 is mandatory for anyone with management or supervisory responsibilities.

- 10.2 Inclusion awareness forms part of onboarding and must be completed within the first three months of employment.
- 10.3 Further training will be provided where needed, including in response to legal, policy or organisational changes.

11 Breaches of the Policy

- 11.1 If you believe you have experienced discrimination, you should raise the matter under the Grievance Policy.
- 11.2 If you believe you have experienced harassment or bullying, you should raise the matter under the Bullying and Harassment Policy.
- 11.3 If you are unsure which procedure applies, or need advice, speak to your manager or a member of the People Team. If you feel unable to do so, please refer to the Whistleblowing Policy.
- 11.4 Concerns about potential breaches of this policy will be handled sensitively, confidentially where possible, and investigated under the relevant procedure. Anyone who raises a concern in good faith will not be victimised. Allegations made in bad faith may be dealt with under the Disciplinary Policy.
- 11.5 Anyone found to have breached this policy may face disciplinary action, up to and including dismissal. Serious cases may amount to gross misconduct.

12 Monitoring

- 12.1 We will monitor training, development, complaints, appeals and harassment cases to identify trends, address risk and improve equality of opportunity.

Should you have any questions in relation to this policy, please contact the people team in the first instance peopleteam@octavius.co.uk.

Review period: Annual