



South Staffordshire Group

Equal Opportunity, Diversity, and Inclusion Policy

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Introduction

It is South Staffordshire Group's ("the Group") aim that all people should have an equal chance and opportunity in life. Therefore, the Group is an equal opportunity employer. This means that the Group's policy is to ensure that no unlawful discrimination occurs, either directly or indirectly, against any person on the grounds of age, gender, gender reassignment, sexual orientation, disability, marital or civil partner status, pregnancy or maternity, race, religion or beliefs (Protected Characteristics).

The Group is committed to creating and maintaining a diverse and inclusive workplace. We believe that a diverse and inclusive environment enhances our ability to attract and retain talented Personnel, leads to more creative and innovative thinking, and ultimately results in better products and services for our customers.

We are committed to providing equal employment opportunities to all Personnel and applicants for employment without regard to all Protected Characteristics, or any other characteristic. This policy applies to all terms and conditions of employment, including recruiting, hiring, promotion, compensation, benefits, training, and termination.

We are also committed to providing equitable treatment to all those we deal with as an organisation, including customers and suppliers.

Purpose

The aim of this policy is to ensure all Personnel receive fair treatment and equal opportunities at work and are not subjected to prejudicial practice because of the Group activities. This will ensure equality of opportunity for all potential Personnel, Personnel, contractors, and customers.

Scope

This policy applies to all persons working for us or on our behalf in any capacity, including Personnel at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, or any other person associated with us, wherever located ("Group Personnel"). It is the responsibility of Group Personnel to ensure that they are acquainted with this policy and any subsequent updates.

Policy key goals:

Everyone will be treated reasonably, equally, and, with fairness.

- We will ensure actions are justified.
- We will provide a workplace free of discrimination, bullying, harassment, and victimisation.
- We will not tolerate discrimination or harassment of any kind, including but not limited to, based on any Protected Characteristic.
- We will promote equality and endeavour to eliminate all forms of unlawful and unfair discrimination.
- The policy is intended to assist the Company put its commitment into practice.
- This policy will aim to give guidance to personnel to help them understand acts of discrimination.

Definitions

Equal Opportunity

A descriptive term for an approach intended not to exclude but to ensure fairness. To entitle all to be treated equally and fairly and to be provided with the same opportunities as people, irrespective of a person's Protected Characteristics, trade union membership, or part-time or fixed-term status.

Diversity

Diversity is a concept that focuses on a broader set of qualities. Diversity refers to human qualities that are different from our own and those of groups to which we belong but that are present in other individuals and groups. Diversity regarding employment may include but is not limited to age, ethnicity, gender, physical abilities, educational background, experience. The Group respects and includes differences, recognising the unique contributions that individuals can make, and aims to make sure that personnel come from as diverse backgrounds as the people we provide our services to.

Inclusion

The term inclusion regarding the work environment is a practice of ensuring that everyone feels connected. People are encouraged to feel they belong, are engaged, and associated through the common goals and objectives of the Group.

Direct Discrimination

Treating someone less favourably because of a Protected Characteristic.

Discrimination By Association

Direct discrimination against someone because they associate with another person who possesses a protected characteristic.

Perception Discrimination

Direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

Indirect Discrimination

A provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and this cannot be justified.

Harassment

Harassment is “unwanted conduct related to a relevant Protected Characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.”

Group Personnel can complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Group Personnel are also protected from harassment because of perception and association harassment.

Harassment can also include third party harassment of Group Personnel by people that are not Personnel such as customers and clients. It is important to note that it is not the intention of the harasser, but how the recipient perceives their behaviour which determines whether harassment has occurred.

Harassment is dealt with further in our Bullying, Harassment and Discrimination Policy.

Victimisation

Retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.

Aims

The Company is committed to fostering a diverse and inclusive environment where all individuals are treated with dignity and respect. To achieve this, we will:

- **Eliminate Unlawful Discrimination and Harassment:** We will actively work to prevent and address any form of unlawful discrimination or harassment against individuals.
- **Ensure Dignity and Respect:** We are dedicated to treating all Personnel and customers with dignity and respect by:
 - Providing mandatory EDI training for all employees to promote awareness and understanding of diversity, equity, and inclusion principles.
 - Establishing and maintaining clear, accessible, and confidential channels for reporting disrespectful or discriminatory behaviour. Reports will be handled with sensitivity and urgency, ensuring prompt and appropriate action.
 - Actively supporting and resourcing our employee networks to gather feedback on workplace culture and treatment of personnel. These networks will have direct communication with

leadership to advocate for necessary changes and drive continuous improvement in our EDI practices.

- Holding leaders and managers accountable for fostering a respectful and inclusive environment, with adherence to EDI principles reflected in performance evaluations.
- **Promote Equality and Opportunity:** We are committed to promoting equality and creating opportunities for all, ensuring that everyone has a fair chance to succeed.
- **Foster Positive Attitudes and Relationships:** We will promote positive attitudes and foster good relations among all people, encouraging collaboration and mutual respect.
- **Encourage Participation:** We will encourage active participation from all Personnel in our diversity and inclusion efforts, ensuring that everyone's voice is heard and valued.
- **Support Minority Groups:** We will actively promote and support the inclusion of different minority groups within our organisation.
- **Ensure Equal Opportunities in Employment and Recruitment:** We will support equal opportunities in all aspects of employment, including recruitment, by ensuring that our practices are inclusive, fair, and based on merit and objective criteria. We will actively seek to recruit candidates from diverse backgrounds and prevent discrimination in all selection processes.
- **Provide Adequate Arrangements for Raising Issues:** We will maintain adequate arrangements to enable Personnel to raise concerns about discrimination or harassment, with a clear process for addressing these issues.
- **Offer Continuous Equality and Opportunities Training:** We will provide equality and opportunities training as part of the induction process and throughout employment, ensuring ongoing education and awareness.
- **Ensure Accessibility for Individuals with Disabilities:** We will ensure our workplace is accessible to individuals with disabilities, making reasonable accommodations and ensuring that our facilities meet accessibility standards.
- **Nurture a Culture of Diversity and Inclusion:** We are committed to creating a workplace where all Personnel feel valued, respected, and included.
- **Address Concerns Promptly:** We encourage all Personnel to participate in creating a diverse and inclusive workplace and to bring any concerns about discrimination or harassment to the attention of HR for prompt resolution.

Fairness, Inclusion and Respect Responsibilities

The Company is committed to ensuring that Fairness, Inclusion and Respect ("FIR") is embedded throughout the organisation.

All Team Members

All Team Members are responsible for:

- Treating team members, customers, suppliers and stakeholders with fairness, inclusion and respect.
- Complying with this policy and associated policies.
- Challenging and reporting inappropriate, discriminatory, bullying or harassing behaviour.
- Contributing to an inclusive working environment where everyone feels valued and respected.

Managers

Managers are responsible for:

- Leading by example and demonstrating inclusive behaviours.
- Ensuring employment decisions are made fairly, consistently and objectively.
- Addressing concerns promptly and sensitively.
- Supporting reasonable adjustments where required.
- Promoting equality of opportunity within their teams.

Human Resources / People Team

Human Resources / People Team is responsible for:

- Providing advice, guidance and training on Fairness, Inclusion and Respect matters.
- Monitoring the effectiveness of this policy.
- Supporting investigations into complaints relating to discrimination, harassment, victimisation or unfair treatment.
- Reviewing policy compliance and recommending improvements.

Directors and Senior Leaders

Directors and senior leaders are responsible for:

- Promoting a culture of fairness, inclusion and respect throughout the Group.
- Ensuring appropriate resources are available to support policy objectives.
- Reviewing policy effectiveness and supporting continuous improvement.
- Demonstrating visible commitment to equality, diversity and inclusion initiatives.

Disabilities and Reasonable Adjustments

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to any services and ability to be employed, trained, or promoted as a non-disabled person.

The Company has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:

- Adjusting premises.
- Re-allocating some or all a disabled employee's duties.
- Transferring a disabled employee to a role better suited to their disability.
- Relocating a disabled employee to a more suitable office.
- Giving a disabled employee time off work for medical treatment or rehabilitation.
- Providing training or mentoring for a disabled employee.
- Supplying or modifying equipment, instruction, and training manuals for disabled Personnel; or
- Any other adjustments that the Company considers reasonable.

If someone has a disability and feels that any such adjustments could be made by the Company, they should contact their Line Manager or HR.

Neurodiversity and Workplace Adjustments

Although not a protected characteristic, we recognise and value neurodiversity in our workforce and encourage individuals to share any adjustments that may support them in their role. Our aim is to create an inclusive workplace where neurodivergent employees can thrive.

It is not permissible to treat a neurodivergent person less favourably than a neurotypical person. Reasonable adjustments must be made to ensure neurodivergent employees have equitable access to employment, training, and career development opportunities.

The Company has a duty to make reasonable adjustments to support neurodivergent employees. These may include:

- Adjusting work environments to reduce sensory overload (e.g., providing quiet spaces or noise-cancelling headphones).
- Offering flexible working arrangements, such as remote working or adjusted hours.
- Providing clear, structured communication, including written instructions or visual aids.

- Allowing alternative interview or assessment methods to accommodate different thinking and communication styles.
- Supplying assistive technology or software to support productivity and focus.
- Any other adjustments that the Company considers reasonable to support an inclusive work environment.

If someone is neurodivergent, and feels that any such adjustments could be made by the Company, they should contact their Line Manager or HR.

Recruitment

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. Our recruitment procedures will be reviewed regularly to ensure that individuals are objectively assessed on the basis of their relevant merits and abilities.

Vacancies should generally be advertised to a diverse section of the labour market by using career platforms and/or recruitment agencies which provide a diverse range of suitable candidates. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Positive Action in Recruitment

'Positive action' means the steps that the Company can take to encourage people from groups with unique needs or with a past record of disadvantage or low participation, to apply for positions within the Company.

If the Company chooses to utilise positive action in recruitment, this will not be used to treat people with a protected characteristic more favourably, it will be used only in tie-break situations, when there are two candidates of equal merit applying for the same position.

Termination of Employment

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Training

Managers will be given appropriate training on recognising and avoiding discrimination, harassment, victimisation and promoting equality of opportunity and diversity in the areas of recruitment, development and promotion.

The Company will provide Personnel with regular training to ensure that everyone is aware of and understand the contents of this policy. Following the training, you will be required to confirm that you have read, understand and will comply with this policy.

Employee Networks

Employee networks are a vital component of our commitment to equal opportunity, diversity, and inclusion (EDI). These networks provide a platform for employees to connect, share experiences, and foster a sense of belonging within the Company. We recognise the value that diverse perspectives bring to our workplace, and we encourage the formation and active participation in employee networks. These groups are empowered to advocate for their members, promote cultural awareness, and contribute to the ongoing development of our EDI initiatives. By supporting employee networks, we aim to create an environment where every individual feels respected, valued, and able to thrive both personally and professionally.

Part-Time and Fixed-Term work

Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

Responsibility for Implementation

All Personnel, subcontractors and agents of the Company are required to act in a way that does not subject any other Personnel or clients to direct or indirect discrimination, harassment, or victimisation on the grounds of their Protected Characteristics.

The co-operation of all Personnel is essential for the success of this Policy.

Personnel may be held independently and individually liable for their discriminatory acts by the Company and in some circumstances an Employment Tribunal may order them to pay compensation to the person who has suffered because of discriminatory acts.

The Company takes responsibility for achieving the objectives of this Policy, and endeavours to ensure compliance with relevant Legislation and Codes of Practice.

Management, Monitoring and Administration

The effectiveness of this Policy will be formally reviewed annually by the Group HR Director. The review will consider:

- Diversity, equality and inclusion objectives and outcomes;
- Feedback from People
- Complaints, grievances and investigations relating to discrimination, harassment and victimisation;
- Legislative and regulatory developments;
- Opportunities for continuous improvement.

The findings of the review will be used to determine whether amendments to the Policy are required and to ensure the Policy continues to support Fairness, Inclusion and Respect throughout the organisation.

This Policy does not form part of any employee's terms and conditions of employment and may be varied from time to time.

The Group HR Director will be responsible for the management of this Policy and has final authority over this Policy.

Suggested changes / amendments should be submitted via email to peopleteam@south-staffordshire.com. Any changes shall be reviewed and approved in accordance with South Staffordshire Group HR Policy and Procedure review process.

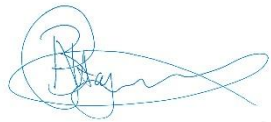
Questions regarding this Policy should be directed to Human Resources using the following email address peopleteam@south-staffordshire.com

Document Details

Owner: Group Legal
Approved By: Group Board
Signed By: Mick Horn, Interim CEO

Approved By: Barry Hayward, Interim COO

Signature: 
Date of Approval: August 2026

Signature: 
Date of Approval: August 2026

Version no.	Ref Number	Last Review Date	Next Review Date	Author	Version Update
2.0	HR-008	09/08/2024	01/04/2025	HR	Minor Wording updates and sections added on Employee Networks and Training. Published
3.0	HR-008	20/03/2025	01/04/2027	HR	Minor wording updates and added section on Neurodiversity.
4.0	HR-008	22/07/2026	01/04/2027	HR	Annual Review and updated to reflect South Staffordshire Group
5.0	HR-008	19/08/2026	01/04/2027	HR	Updated to strengthen Fairness, Inclusion and Respect (FIR) commitments, added responsibilities for employees, managers, HR and Directors, enhanced policy effectiveness monitoring and annual review arrangements, updated approval process to CEO sign-off.
6.0	HR-008	24/08/2026	01/04/2027	HR	Additional Director Approval Added