

G4S CARE AND REHABILITATION SERVICES

Diversity, Inclusion and Equality Policy

BUSINESS	G4S Care and Rehabilitation - HR
PRODUCT	HR Policies Control Document
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DOCUMENT CONTROL

CHANGE CONTROL RECORD

VERSION	VERSION DATE	REVIEW DATE	POLICY OWNER	DOCUMENT HISTORY
1.0	June 2013	June 2014	Moira Wallis – HR Policy Director	HR Process Review
2.0	September 2013	September 2014	Moira Wallis – HR Policy Director	Public Sector Duty Review
2.1	March 2014	March 2015	Moira Wallis – HR Policy Director	Revision to Business Unit Name
2.2	June 2014	June 2015	Sarah Stevens – HR Project	Formatting changes in line with corporate renewal programme
2.3	November 2014	November 2015	Moira Wallis – HR Policy Director	Business Update
2.4	November 2015	November 2016	Moira Wallis	HR Policy Review
2.5	June 2016	June 2017	Heather Noble	Revision to Policy Owner
2.6	June 2017	June 2018	Hayley Green	Revision to Policy Owner and Values
2.7	December 2018	December 2019	Sarah Stevens	Policy Review
3.0	September 2019	September 2020	Hannah Woolliscroft	HR Policy Review
4.0	November 2020	November 2021	Hannah Woolliscroft	HR Policy Review and Business Name Change
5.0	December 2021	December 2022	Hannah Woolliscroft	HR Policy Review, Business Name Change and addition of 'Inclusion'

Table I – Document Change Control Record

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MAIN SOURCE DOCUMENTATION

- ACAS Guidelines on Diversity and Equality
- EHRC Codes of Practice
- Equality Act 2010

KEY PERFORMANCE INDICATORS

- Employee Gender, Ethnic Origin and Age Percentage of all Employees, Monthly and Annually

SCOPE

- All Employees

I. Overview

- 1.1 G4S Care and Rehabilitation Services (CaRS) prides itself on being an inclusive employer and strives to ensure that our workforce is representative of the communities within which we sit and the people in our care.
- 1.2 All our employees should be free to carry out their roles with dignity and respect and can expect to be treated fairly, inclusively and protected from any form of bullying, harassment, discrimination or victimisation in the workplace. To be a truly inclusive workplace, our employees should expect to be able to be their true selves without any fear of exclusion.
- 1.3 The aim of this policy is to encourage harmony and respect amongst individuals to promote good working practices with a view to maximising the performance of the Company and its employees.
- 1.4 All aspects of the employment cycle are covered by this policy. These include, but are not restricted to the following:
- Pay and conditions of employment
 - Training and continuing professional development
 - Recruitment processes
 - Promotion policies
 - Procedures for appraisals
 - Procedures for addressing grievances and disciplinary matters
 - Ending the employment contract
 - Providing outgoing employees with references
 - How visitors are treated
 - How clients and suppliers are treated
 - How any other business contacts and associates are treated.
- 1.5. All employees, consultants, contractors, agency and casual workers are covered by this policy, which commits the Company to being an equal opportunity employer.
- 1.6 It does not form part of any contract with the Company but applies regardless of length of service.
- 1.7 G4S CaRS reserve the right to amend this policy at any time.
- 1.8 This policy should be read in conjunction with our G4S CaRS policies on;
- Harassment and Bullying
 - Disciplinary and Performance
 - Grievance
 - Recruitment and Selection
 - Neurodiversity
 - Menopause
 - Transgender

2. Our Commitment

- 2.1 Diversity, Inclusion and Equality is essential to ensure that our employees feel able to be their true selves in the workplace and perform at their best. If these values are not applied, then talent and potential is wasted.

2.2 G4S CaRS take our commitment to provide a diverse, inclusive and equal workplace very seriously and wilful failure to apply the policy or evidence of discrimination, harassment or victimisation (as contained in the G4S CaRS Harassment and Bullying Policy) will be taken very seriously.

2.3 Discrimination and / or harassment will not be tolerated and we are fully committed to promoting equal opportunities in employment. Our employees and anyone applying for a job within the Company will receive fair and equal treatment.

- G4S CaRS ensure full access to everyone applying for a vacancy and decisions concerning transfers and internal promotions are made so far as possible using only objective criteria;
- G4S CaRS will never victimise anyone who makes a legitimate complaint if they, or somebody else, is being harassed or discriminated against.

2.4 This policy is further underpinned by the following commitments and aims:

- To provide a working environment free from all forms of unlawful discrimination, including victimisation and harassment;
- To have a workforce that is confident of being treated fairly and equally throughout the employment relationship;
- Create an inclusive workplace capable of allowing everyone to achieve their highest potential;
- Company-wide understanding of the message promoted by this policy;
- A commitment to ensuring all employees understand their rights and responsibilities under this policy;
- Ensure employment opportunities are open to all qualified candidates so that we recruit from the largest possible pool of available talent and recruit the best qualified individuals;
- Have a commitment to creating a workforce based on ability that also mirrors the multicultural composition of the Company's local community;
- Commitment to regularly review this policy and our workplace practices to identify issues and eliminate any unlawful discrimination or other unacceptable behaviour we may find;
- Protect staff from being victimised or treated less fairly if they make a complaint in good faith under this policy.

2.5 It is the responsibility of every employee to ensure that their own conduct conforms to the expected standards of this policy at all times.

3. How we Define Discrimination

3.1 All employees will be treated with dignity and respect and we will use our best endeavours to provide a working environment, which is free from unlawful discrimination of a protective characteristic or otherwise. No individual will be treated in any respect less favourably than another.

3.2 Employees must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts) and on work-related trips or events including social events.

3.3 When discrimination, harassment or victimisation takes place, they bring about a climate of fear, insecurity and poor performance. As well as being unlawful, it affects profitability and morale. It is therefore vital that employees understand their responsibilities.

3.4 Discrimination and / or harassment is taken very seriously by the Company and wilful failure to apply this policy or any genuine evidence of discrimination, harassment or victimisation may lead to disciplinary action that may itself result in action, up to and including dismissal, in line the G4S CaRS Disciplinary and Performance Policy.

3.5 There are five types of discrimination, all of which will not be tolerated in the workplace;

1. **Direct Discrimination** – Whereby an employee is treated less favourably than another person because of a protected characteristic they have or are thought to have.
2. **Discrimination by Association** – Direct discrimination against an employee or individual because they associate with another person (irrespective of whether the other person is an employee) who possess a protected characteristic or are thought to have.
3. **Perception Discrimination** - Direct discrimination against an employee or individual because others think they possess a protected characteristic. This applies even if the person does not actually possess that characteristic.
4. **Harassment** - Sexual harassment and other unwanted conduct related to a protected characteristic against an employee, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. For further information, see the G4S CaRS Harassment and Bullying Policy.
5. **Victimisation** – Where an employee is treated less favourably because they have made or supported a complaint, raised a grievance connected with a protected characteristic or is suspected of doing so. Employees should be aware however that employees are not protected from victimisation if they have made, or supported a complaint, which is found to be untrue.

3.6 **Indirect Discrimination** - In addition to the above, the Company will take all reasonable steps to ensure indirect discrimination does not take place. This may occur when the Company or management has, or implements, a rule, policy or practice, which applies to all employees but particularly disadvantages those who share a particular protected characteristic.

3.7 The Company is committed to take all reasonable steps to ensure such discrimination is avoided, however in certain circumstances indirect discrimination may be justified, if it can be shown that the Company has acted reasonably in seeking to achieve a legitimate business aim.

3.8 Discrimination and / or harassment may involve action or inaction, behaviour, exclusion, comment or physical contact that the recipient finds objectionable or offensive. It may result in the recipient feeling threatened, humiliated, intimidated, patronised, demoralised or less confident in their ability. Condoning such conduct may be regarded as discrimination and / or harassment in itself.

3.9 Discrimination and / or harassment can take place via a number of methods including, but not restricted to, words and / or actions communicated:

- Face to face
- Via telephone
- Via email
- Via social networks
- Via internet
- Via video

3.10 Examples of unacceptable conduct include:

- Verbal abuse or insulting behaviour
- Sexist, ageist or racist jokes, jokes about an individual's sexual orientation or jokes about an individual's physical or mental attributes or age
- The display or circulation of sexually suggestive or racially abusive material
- The use of offensive language
- Bullying, coercive or threatening behaviour
- The ridicule or exclusion of an individual for cultural or religious differences, and / or on the basis of any protected characteristic or other personal characteristic
- Unsolicited or unwelcome sexual advances, including touching, staring or commenting

- Comments of a sexual nature about a person's appearance or dress. Please note this list is not exhaustive

3.11 The '**Protected Characteristics**' are:

- Age
- Race (which includes colour and ethnic / national origin)
- Disability
- Religion or belief
- Gender
- Gender reassignment
- Pregnancy or maternity
- Sexual orientation
- Marital or civil partner status

3.12 There are other actions, which are illegal under the equal opportunities legislation, and these are collectively labelled as 'other acts'. Examples include:

- Instructing another person or applying pressure on them to discriminate;
- Knowingly assisting somebody else when they are carrying out a discriminatory act;
- Discriminating against somebody believed to have a protected characteristic, whether or not they actually do, or because they associate with a third party who does.

3.13 There are practices, which although they appear to breach the aims of this policy, are in fact justifiable on objective and operational grounds. These are called lawful practices. For employees, who are not sure whether some aspect of workplace behaviour they have experienced or witnessed is discriminatory or a lawful practice, they are encouraged to speak to their Line Manager or HR representative for clarification.

4. How We Carry out our Responsibilities and Duties

4.1 Both management and colleagues are essential for ensuring the success of this policy and each has their own duties and responsibilities. We all have both a legal and moral responsibility to comply and any of us may be found personally liable for unlawful discrimination if we breach the terms of this policy.

- Everyone working at managerial level is expected to act in full accordance with this policy; lead by example, and attain and maintain appropriate standards of behaviour within the teams they manage.

4.2 The ethos and standards covered by this policy can only be achieved and maintained if all employees also cooperate fully. Should an employee breach this policy, they may also make the Company liable for their actions and both parties may have to pay compensation to anyone who claims against us. We accordingly expect all employees to take personal responsibility for adhering to the policies aims and commitments and for drawing any breaches of it to our immediate attention.

4.3 We also encourage all employees to take part in promoting diversity, inclusion and equal opportunities across the Company. Employees should contact their Line Manager or HR representative if they have any ideas about how we could do this better, or if they would like to play a bigger role within it.

5. How we Recruit, Promote and Make Other Selections

5.1 G4S CaRS undertakes to review periodically its selection criteria and procedures in regard to recruitment, employment, training and promotion and other types of selection such as redundancy criteria to maintain a system where individuals are selected, promoted, trained and treated solely on the basis of their merits, aptitude and abilities.

- 5.2 Advertisements for vacancies will not include wording that may discourage any groups of people from applying, or stereotype in any way and they will be placed where they can reach as wide and diverse a pool of potential candidates as possible.
- 5.3 Nobody applying for employment with G4S CaRS will be asked about their health or whether they have a disability before a job offer is made, except in very limited situations. It may, for example, be justifiable to ask whether the applicant needs any disability related measures put in place for the interview, or to check that they are capable of carrying out a key part of the job role.
- However, due to the type of work that G4S CaRS conducts; to protect the health and safety of the individual and those around them; some of our job roles are dependent upon a medical examination and job offers will be pursuant to that.
- 5.4 We will not ask job applicants anything that might suggest an intention to discriminate on the grounds of a protected characteristic, an example of this would be asking an applicant about their religion for a job entailing weekend working. This would not be acceptable.
- 5.5 All employees will be helped and encouraged to develop their full potential and talents and will be fully utilised to maximise the performance and efficiency of the Company.
- 5.6 We are committed to the employment of those with disabilities whenever reasonably possible and practical and will treat such employees in all aspects of their recruitment and employment in exactly the same way as other employees, the limitations of their disability permitting.
- If an existing employee becomes disabled, the Company will make every effort to retain them within the workforce whenever reasonable and practicable.
- 5.7 To ensure that the Company is able to monitor its equal opportunities standards, applicants may be asked questions in the recruitment process around health or disability but the data gathered will never be used for selection or any other employment related decisions.

6. How we Enforce this Policy and Handle Breaches

- 6.1 G4S CaRS will not tolerate acts which breach this policy from any person regardless of level or position. All instances of such behaviour or alleged behaviour will be taken seriously, fully investigated within a reasonable timeframe and may be subject to appropriate disciplinary action, as per the G4S CaRS Disciplinary and Performance Policy.
- 6.2 If an employee believes that they have been victimised within the scope of this policy, then they should contact their Line Manager as soon as possible. Should the complaint be in relation to their Line Manager, then they should contact the Line Manager's manager or relevant HR representative.
- 6.3 If resolving the issue informally proves impossible, employees must then refer to the G4S CaRS Grievance policy and may consult the G4S CaRS Harassment and Bullying and G4S Raising Concerns and Whistleblowing Policies if they feel it appropriate to do so. We will treat all complaints in confidence, as far as is possible and if we find that an employee has been the victim of harassment or bullying will take steps to stop it continuing or recurring.
- 6.4 Should the Company decide that the complaint cannot be substantiated, we will explain the reasons why to the employee. Either way, we will look at ways of addressing the relationship with the person accused. We may, for example, review work patterns, or suggest counselling or mediation.

- 6.5 Before employees raise a complaint, they must remember that we have a duty to protect all parties / employees / workers. That means that if the employee changes their mind after complaining; even informally or in confidence, we may choose to investigate anyway, particularly if the allegation is serious. We will however not do so without talking to the employee first.
- 6.6 If an employee feels that the outcome from any complaint raised under this policy is unsatisfactory they should either:
- refer to the G4S CaRS Grievance Policy to bring the matter to the Company's attention, or
 - where the matter has already been raised formally in writing, they may appeal against the Company's decision via the grievance appeal process.
- 6.7 Employees may face disciplinary action if we find that they have acted in a discriminatory manner in relation to this policy, which could lead to action up to and including summary dismissal, as per the G4S CaRS Disciplinary and Performance Policy.
- 6.8 Occasionally, people make complaints knowing them not to be true. They might do this to avoid or deflect disciplinary action, for example. We view any complaint made in bad faith as an act of misconduct and this in itself could lead to disciplinary action up to and including summary dismissal, as per the G4S CaRS Disciplinary and Performance policy.

7. How We Monitor Whether the Policy is Working

- 7.1 We record and analyse information about equal opportunities within the workplace, which is gathered during the application process. We use the information to make sure this policy is operating properly and to refine it, review the composition of the workforce and to promote workplace equality.
- 7.2 The Company undertakes to distribute and publicise this policy statement to all employees.

8. Further Support

- 8.1 Should an employee feel that they are being victimised under the scope of this policy, we encourage them to speak to their Line Manager without delay.
- 8.2 We recognise that when individuals are involved in this type of process, they may require additional support during and after the event. G4S CaRS offers a range of benefits relating to health and wellbeing to our employees and their immediate families and some of those can be useful during such a period. Below details some of the benefits available, for more information employees should contact their Line Manager or HR representative.
- 8.3 **Employee Assistance Programme (EAP) - WeCare** provides confidential and comprehensive support for all employees, as well as their immediate families. Access is available 24/7 to online GP consultations, mental health counselling, burnout prevention, diet support, financial guidance and much more.
- 8.4 Through the WeCare app, employees can access the following:

8.5 Physical Health

- GP Consultation – 24/7 access to a GP, via video or phone call, with no usage limitations. Employees can also get private prescriptions delivered to their front door.
- Second Medical Opinion – Ability to obtain a second opinion on almost any diagnosis, from one of 50,000 leading consultants worldwide.
- Stop Smoking – On-going support and tips from a team of specialists to help individuals to quit smoking.

8.6 *Mental Health*

- Mental Health Support – Qualified mental health professionals can provide up to 10 counselling sessions specialising in anxiety, stress and depression.
- Burnout Prevention – A counsellor will work to address the symptoms of burnout before it becomes overwhelming.
- Life Events Counselling – Employees and their immediate family members can receive up to 10 personalised counselling sessions after a traumatic experience.

8.7 *Wellbeing*

- Healthy Diet – Hints and tips on how to improve diet.
- Get Fit Programme – Access to a custom four or eight week get fit programme, with a structured exercise and diet plan.
- Diet Support – Guidance from a professional nutritionist, who will arrange a weekly diet plan.

8.8 *Legal and Financial Guidance*

- Financial guidance - Guidance from a specialist on a range of issues, from budgeting tips and financial education to making the most out of work benefits.
- Legal guidance - Legal experts can help simplify a range of legal issues from property law to consumer disputes.

8.9 To access these services, employees and their immediate families should;

- **Telephone** - 0800 917 9330, any time of the day or night, employees will be asked which Company they work for.
- **Online** – Visit www.wecare-cl.com using the unique access code – H93677 for further details
- **App** - Download the ‘WeCare Programme’ app from the App Store or Google Play and use the unique access code – H93677

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