

Cpl UK Diversity and Inclusion Policy

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Formal Review of Policy by:	Sharon Vize, Chief People Officer
Policy Links:	This policy links to all policies, procedures and strategy documents adopted by Computer Placement Limited. Specific reference is made to the following documents: • Disciplinary and Grievance Procedures • Dignity at Work and Harassment and Sexual Harassment Policy • Complaints Procedure for Clients

Brief Policy Summary:

This policy sets out how Cpl will achieve it's aims to promote and recognise the value of Diversity & Inclusion among our employees and where all our people feel included and valued irrespective of their differences.

At Cpl, we endeavour to ensure that Diversity & Inclusion is reflected in all areas of the organisation's work and service provisions, including the communities within which we operate.

Cpl UK Diversity and Inclusion Policy

Contents

- 1. Purpose**
- 2. Objectives**
- 3. Scope**
- 4. Key Diversity & Inclusion Concepts**
- 5. Management and Delivery of this policy**
- 6. Selection, Recruitment and Retention**
- 7. Service Delivery**
- 8. Procurement**
- 9. Monitoring and Evaluation**
- 10. Review**

1. Purpose

1.1. Policy Statement

Cpl recognises that its employees, candidates, and clients come from diverse backgrounds, with varying experiences and needs. We are committed to ensuring diversity & inclusion is embedded into our day-to-day working practices. Cpl actively promotes fairness, respect, equality, diversity, inclusion and engagement and is committed to continuous improvement.

1.2. Through our policies and in our day to day work and fulfilment of our legal responsibilities, Cpl is committed to promoting equality and fairness and combating discrimination. This applies to everyone, regardless of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex or Sexual Orientation.

2. Objectives

2.1. In order to effectively implement its commitment to being an equal and diverse organisation, Cpl has identified the following objectives:

- Provide the organisation's leaders with the skills and knowledge to fully embed fairness, respect, equality, diversity, inclusion and engagement into the organisation's culture, strategy and processes.
- Provide diversity & inclusion training to all employees, which will include content on their responsibilities, relevant legislation and this policy
- Ensure that DEI is at the forefront of all our minds with company wide goal introduced across the Cpl Group for 2023. The goal is as follows:

Play your part in making Cpl a Diverse, Equitable and Inclusive workplace for all:

- Attend/complete a minimum of 2 DEI related trainings
- Attend and contribute to a minimum of 3 Events/Webinars/Be Proud Cafés related to Diversity/Equity & Inclusion/Wellbeing

Cpl UK Diversity and Inclusion Policy

- Use at least 4 hours/half day of your 2 Days paid volunteering time off for a charitable cause
- Ensure that no client or potential client receives less favourable treatment than any other, making adjustments to services where necessary in order to facilitate this
- Ensure opportunities are accessible to all, introducing reasonable accommodations to facilitate this where required
- Gather data to enable the monitoring of client and employee's satisfaction to identify and address any negative trends in line with the 9 protected characteristics.
- Create an environment where employees and clients are treated fairly and with dignity and respect
- Enforce a zero-tolerance approach in relation to discrimination, bullying, harassment and inappropriate behaviour, thoroughly investigating any reported incidents and taking appropriate actions.
- Ensure fair treatment for job applicants, which is free from bias
- Make the best possible use of our existing and potential workforce through effective talent management
- Provide a safe, supportive and welcoming environment where everyone can contribute to their fullest potential and bring their whole selves to work at all times
- Challenge discrimination and promote diversity through training, programmes and events
- Provide training to employees on Cpl approach to diversity & inclusion, its commitment to zero tolerance in relation to discrimination, bullying, harassment and inappropriate behaviour and the contents of this policy.
- Act as role models to partner organisations and other external stakeholders.
- Undertake Equality Impact Assessments on all policies, processes and procedures in order to ensure that no direct or indirect discrimination exists within these.

3. Scope

3.1. This policy applies to the organisation, its directors, managers, employees, partners and to any external stakeholders which are supported by or engage with the organisation.

3.2. Diversity & inclusion imposes rights and responsibilities on every member of employees. All employees will be informed that a Diversity & Inclusion policy is in operation and that they are bound to comply with its requirements. The policy will also be drawn to the attention of external stakeholders, job applicants and clients.

3.3. The policy ensures that our statutory equality duties outlined in the Equality Act 2010 are met.

3.4. The protected characteristics are defined as being:

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

4. Key Equality & Diversity Concepts

Cpl UK Diversity and Inclusion Policy

4.1. **Diversity** can be defined as the visible and non-visible differences between individuals. These differences can be related to race, ethnicity, religion, age, disability, sexual orientation and gender, as well as the many differences in values, attitudes, beliefs, cultural views, skills, knowledge, education, background, employment, parenthood, marital status, and life experiences of every individual.

4.2. **Equal Opportunities** can be defined as ensuring all those involved with or wishing to be involved with the organisation, regardless of their diversity, are provided with opportunity based on their ability or potential to perform the required activity.

4.3. **Discrimination** is unequal treatment of an individual because of their membership of a particular class or group, such as sex, race, or trade union. It may be direct, for example, refusing to send someone on a training course because they are married or have children. It may be indirect, for example, declaring a post as being suitable only for a full-time member of employees without proper justification (i.e. establishing the need for a full-time member of employees rather than for part-timers or job sharing).

4.4. **Discrimination** may be subtle and unconscious and may not be easy to identify. For example, discrimination sometimes results from general assumptions about the capabilities, characteristics and interests of particular groups or individuals, which are allowed to influence the treatment of employees or job applicants or clients. This includes unconscious bias.

4.5. **Harassment or bullying** has the effect of causing undue stress on individuals and of demotivating them. Harassment or bullying of any kind will not be tolerated and serves to undermine the safe, supportive and welcoming environment which Cpl wishes to encourage.

5. Management and Delivery of this policy

5.1. Fairness, Respect, Equality, Diversity, Inclusion and Engagement are the responsibility of everyone within Cpl.

5.2. The Leadership team of Cpl is committed to embedding Diversity & inclusion within the business, ensuring that everything we do and the manner in which it is done, makes reference to and considers the impact upon our equality objectives.

5.3. Cpl uses the procurement process to ensure that its partners and external stakeholders operate their businesses with similar equality objectives and delivers its services with the same ethos.

5.4. It is the responsibility of Cpl CEO & Chief People Officer to implement, monitor and evaluate the diversity & inclusion policy in terms of employment practices (selection, recruitment and retention) and service delivery.

5.5. The Policy Statement (at paragraph 1.1) will be communicated to all employees, visitors, clients and other stakeholders using a variety of methods such as the employee's communication and engagement tool Workvivo, the website, displayed in offices and where appropriate included in publications.

5.6. Annual work plans are in place, which specifically address the diversity & inclusion aspects of all areas of work for employees; these support the delivery of the objectives contained within this policy.

5.7. Our employees will receive appropriate training to ensure they understand their responsibility not to discriminate and to treat everyone with respect and dignity. Employees are expected to be aware of personal prejudices, unconscious bias and stereotypes and always avoid labels.

Cpl UK Diversity and Inclusion Policy

5.8. All employees will be made aware of and follow the requirements in the Dignity at Work and Harassment and Sexual Harassment Policy.

5.9. Existing processes will be used to review and investigate any complaints in relation to discrimination, harassment or bullying as follows:

- Employees – Dignity at Work or Harassment, Sexual Harassment Policy, or Disciplinary
- Clients (those using our services) - Complaints procedure

5.10. It is expected that when employees represent Cpl at any time, including through attendance at committees, meetings with external stakeholders and contact with clients, they will ensure that the diversity & inclusion principles and practices outlined in this policy are adhered to.

5.11. When representing Cpl on the committees of other agencies, each employee will endeavour to ensure that diversity & inclusion principles and practices are adopted by those agencies.

6. Selection, Recruitment and Retention

6.1. Cpl aims to promote diversity & inclusion as an employer. It also aims to ensure that no job applicant or employee receives less favourable treatment or is disadvantaged by conditions or requirements that cannot be shown to be justifiable within the context of the policy.

6.2. Selection, recruitment, training, promotion, and employment practices generally will be subject to regular review to ensure they comply with this policy. In particular, selection and recruitment procedures will be reviewed annually to constantly improve diversity & inclusion practices and respond to changes in legislation. Cpl will monitor data on all applicants as well as those that are successful to identify any practices that unintentionally discriminate against specific groups.

6.3. We will take whatever positive action is required where it can be shown that underrepresentation of any particular group has occurred. Where appropriate and legally permissible employees from under-represented groups will be given training and encouragement to promote diversity & inclusion within Cpl.

6.4. Employees involved in the selection and recruitment process, and in the management of employees, will receive appropriate training to ensure they recognise when they are making stereotypical assumptions or judgements about people, and avoid any discriminatory practices in the way in which they shortlist, recruit or manage employees. This will include unconscious bias training.

6.5. We regard discrimination, harassment, abuse, victimisation or bullying of employees, clients or of others in the course of work as disciplinary offences that could be regarded as gross misconduct. Condoning such behaviour could also be treated as a disciplinary offence. As well as disciplining the perpetrator(s), we will give appropriate support to people who complain of harassment of themselves or others.

6.6. Cpl has considered the working practices it has in place to address inequality, and discrimination and how it promotes fairness for all. Examples of these against each of the protected characteristics are given below but is not a definitive list of all that Cpl does:

6.6.1. We recognise that employees have different needs at different stages during their career, both men and women, for example to balance work and caring responsibilities. We will attempt to accommodate employees' requests to work

Cpl UK Diversity and Inclusion Policy

flexibly, whether part-time or some other working arrangement, for whatever reason, so long as agreement is consistent with the needs of the organisation. We will also encourage initiatives designed to help employees who wish to return to work after a career break.

6.6.2. Our terms and conditions of employment allow for paternity and new parent leave in addition to standard maternity leave, in accordance with current legislation.

6.6.3. We recognise that organisations are obliged, under the Equality Act 2010 to make reasonable accommodations to support disabled people and enable them to do their job without unnecessary difficulty. We will make accommodations which are reasonable, whether or not we are obliged to do so by law, and whether or not a disabled applicant or employee is covered by the definition of 'disabled' under the Equality Act 2010.

6.6.4. We are committed to ensuring employees do not experience discrimination (or less favourable opportunities/treatment) on the basis of their race, religion or belief by:

- Allowing time and, if possible, a place for prayers during the working day and at the workplace as appropriate.
- Considering employees' dietary requirements in catering for employees, and when providing facilities for employees to eat and store food.
- Allowing employees of particular faiths to take their holidays for religious festivals and other religious observance.
- Trying to arrange job interviews or other important work meetings at times when they do not clash with important religious festivals.
- Not imposing a dress code with which people of a particular religion cannot comply.

6.6.5. We will not discriminate on grounds of age in recruitment, promotion, training, or the availability of benefits - such as pension contributions or health insurance.

6.6.6. We will not discriminate on the grounds of gender, where an individual is in the process of gender reassignment or where an individual has completed this reassignment.

6.6.7. Cpl will not discriminate on the grounds of marriage or civil partnership and will support individual need as required.

6.6.8. We will not discriminate on the grounds of an individual's sex or on the grounds of the sexual orientation.

6.7. As part of its talent management strategy Cpl will operate an annual end of year discussion forum appraisal system. Training or further education development to enhance potential within the existing job, arising out of needs identified through performance or coaching discussions or from other circumstances, will, where appropriate or possible, be provided. We may, in certain circumstances, allow for paid or unpaid leave for training or educational purposes.

6.8. Cpl's retention, reward and progression processes are fair and take account of the social, domestic, cultural, and physical obstacles to people progressing. We seek to identify where these exist for individuals and take actions to limit these where necessary.

6.9. We undertake a review of pay and continually work towards eliminating any unfair pay gaps where these are identified.

Cpl UK Diversity and Inclusion Policy

6.10. All training opportunities will be published widely through Line Managers to all appropriate employees, and not in such a way as to exclude or disproportionately reduce the numbers of applicants from a particular group. In all training opportunities we will pay due regard to the need to eliminate discrimination on the grounds set out in this policy.

7. Service Delivery with our clients

7.1. We will use a variety of methods to regularly consult with our clients. We will gather their views on existing and planned services, including changes to provision.

7.2. We will make public our commitment to combating discriminatory attitudes where these are encountered by publishing this policy widely amongst employees, partners, recognised trade unions and external stakeholders and in a variety of formats.

8. Procurement

8.1. Cpl is committed to working with a wide range of suppliers and contractors, from local businesses through to large multi-nationals across a wide range of different types of contracts and purchases.

8.2. Diversity & inclusion will be considered during the procurement process and on the award of contracts there will be an expectation that contractors comply with the relevant legislation and principles of this policy.

8.3. Each contractor that engages in the Cpl procurement process will be required to hold the appropriate certification and qualifications for the works and services they are submitting a bid to carry out. The application process will require the contractor to provide evidence of a formal diversity & inclusion policy further supported by evidence of training delivered to employees, the provision of information and a commitment to on-going support and training.

8.4. The extent will be dependent on the nature of the work and size of the contractor, but examples of compliance requirements may include contractors being required to;

- Provide diversity & inclusion training for all of their employees, or for their employees to attend Cpl's diversity & inclusion training
- Carry out diversity & inclusion monitoring of their employees and to take action to deal with any under-representation of particular groups
- Undertake 'reasonable accommodations' when delivering services for clients.

9. Monitoring and Evaluation

Cpl will systematically evaluate its services and the effectiveness of its diversity & inclusion policy by a variety of means.

9.1. Information gathered through the complaints, grievances, disciplinary or other appropriate processes will be analysed by the 9 protected characteristics where this information is available to identify any particular trends. Where any negative trends are identified, these will be investigated fully and recommendations made to the appointed representative.

9.2. We will report annually to the Board on the outcomes of monitoring and evaluation activities, including any trends in relation to the 9 protected characteristics.

10. Review Cycle

10.1. Responsibility for review of this policy sits with People Experience.

10.2. A formal review will be completed 2-yearly.

Cpl UK Diversity and Inclusion Policy

10.3. Additionally, an interim review would be conducted in the following circumstances:

- A change is made to relevant legislation, including but not limited to the Equality Act 2010
- The investigation into a negative trend indicates a review of this policy is appropriate

Changes to this Policy

Cpl reserves the right to amend this policy and will give 1 months' notice of any changes.

For any questions on the Diversity & Inclusion Policy, please contact People Experience.

People Experience:

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