



Equality, Diversity & Inclusion Policy

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Aims and Objectives

The RTC Group believes equality, diversity and inclusion (EDI) involves creating an environment supported by practices which benefit the Company and everyone in it. We believe that people, whilst similar in many ways, differ from one another in various ways. Understanding, valuing and effectively managing these differences can result in greater participation. This can lead to benefits and success at an individual, team, company, group and wider societal level.

We aim to provide a supportive, inclusive workplace free from discrimination, where everyone is treated equally regardless of their differences. We do this by valuing difference and developing a business culture that reflects our beliefs. We embrace equality, diversity, and inclusion and seek to promote their benefits in our business activities. Our recruitment companies also strive to help their clients meet their own diversity targets.

We promote diversity for all employees, workers and applicants. We regularly review all aspects of our recruitment to avoid unlawful discrimination and make decisions based on merit. We also seek to expand the media in which we recruit to ensure that we have a diverse employee and candidate base and avoid stipulating unnecessary requirements which may exclude a higher proportion of a particular group of people. We will not prescribe discriminatory requirements for our roles.

Our recruitment companies will not discriminate unlawfully when deciding which candidate/worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for workers. We will ensure that each candidate is assessed in accordance with their merits, qualifications and ability to perform the relevant duties for the role.

Furthermore, we will monitor the composition of our workforce to ensure that this policy is effective.

Status of this Policy

This policy does not give contractual rights to individuals. We reserve the right to alter any of its terms at any time and an updated version will be uploaded onto Cezanne, the Group HR System.

Responsibility for this Policy

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives for equality, diversity and inclusion.

The HR Team are responsible for reviewing and updating this policy. Employees are invited to comment on this policy and suggest ways in which it might be improved. Should you have any feedback, please contact hr@rtcgroupplc.co.uk.

What is Equality and What is Diversity?

'Equality' requires us, and you, to treat everyone equally and fairly, with equal opportunities and rights.

'Diversity' recognises that this world is full of differences. We should value and positively embrace these differences. It is important for differences to be recognised. But it is equally important that, whilst recognising them, each and every person does so positively, with the importance of equality at the forefront of their minds.

Our Commitment to Equality, Diversity and Inclusion

We want everyone associated with our business to have a fair and equal opportunity to achieve their very best in a safe working environment. We want everyone who works for us to understand the importance of this, and to act consistently with it at all times.

We will not tolerate discrimination or harassment in our business, and we will not victimise anyone who makes a legitimate complaint to us about harassment or discrimination, or anyone who supports a colleague in their complaint.

This Policy is underpinned by the following further commitments:

- to create a working environment free from all forms of unlawful discrimination, including victimisation and harassment
- to have a workplace capable of allowing everyone to achieve their potential, and where individuals are willing to give their best
- to make sure that all staff understand their rights and responsibilities under this Policy – if you are not sure what we consider acceptable and unacceptable, you should check with your line manager

- to amend this Policy if we think it has become outdated, or circumstances suggest that it needs to be updated
- to protect staff, wherever possible, from being victimised or treated less fairly if they make or support a complaint in good faith under this Policy

Why Might a Person be Treated Unfairly or Less Favourably?

Although it is important to create a workplace which promotes fairness for all, the law focuses its protection on nine characteristics. The current protected characteristics are:

- age
- disability (which means someone with a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry-out normal day-to-day activities)
- gender reassignment (which covers any person who is proposing to undergo, is undergoing or has undergone a process for the purpose of reassigning their sex by changing physiological or other attributes of sex)
- marriage and civil partnership
- pregnancy and maternity
- race (incorporating colour, ethnic origin, national origin and nationality)
- religion or belief
- sex
- sexual orientation

You do not have to have a protected characteristic in order to claim discrimination. The law protects individuals from being treated less favourably because of a protected characteristic they are thought to have (**discrimination by perception**) or because of the characteristic of someone they are associated with (**discrimination by association**).

What are the Different Types of Discrimination?

Generally, discrimination involves unfair treatment based on an actual or perceived protected characteristic. It can take several forms which are legally protected. We do not tolerate any form of discrimination. Sometimes, actions can be intentional and sometimes unintentional. We include examples of both types in this list:

Direct Discrimination

Direct discrimination is when someone is treated less favourably because of a protected characteristic. Treating someone less favourably means treating them worse in comparison to others who do not have that protected characteristic.

For example, it would be direct discrimination if a manager excludes an employee from a training course because she is gay.

Direct discrimination can also take place if someone is treated less favourably because it is assumed that they have a protected characteristic (**discrimination by perception**) or are associated with someone who has a protected characteristic (**discrimination by association**).

For example, it would be direct discrimination if an employee ostracised a colleague because the colleague has a gay flatmate (discrimination by association) or because they believe the colleague is gay (discrimination by perception).

Our recruitment companies will not discriminate against a person on the grounds of a protected characteristic:

- in the terms on which they offer to provide any services;
- by refusing or deliberately omitting to provide any services;
- in the way they provide any services.

Direct discrimination would also occur if one of our recruitment businesses accepted and acted upon instructions from an employer/end client stating that certain persons are unacceptable due to a protected characteristic, unless there is an objective justification (i.e. a proportionate means of achieving a legitimate aim). Recruitment staff should refer to the HR Team for advice **before** actioning such an instruction.

Indirect Discrimination

Indirect discrimination occurs when an apparently neutral practice or requirement (provision, criterion or practice (PCP)) is applied but results in people who have a protected characteristic being placed at a disadvantage in comparison to those who do not have the protected characteristic.

For example, insisting all staff work on Saturdays without a good business reason (which may indirectly discriminate against Jewish employees, who may not be able to work on the Jewish Sabbath).

If the provision, criterion or practice (PCP) can be objectively justified (i.e. a proportionate means of achieving a legitimate aim), it will not amount to discrimination. Recruitment staff

should refer to the HR Team for advice on objective justification received from an employer/end client **before** taking any action.

Indirect discrimination would also occur if we accepted and acted upon an indirectly discriminatory instruction from an employer/end client.

Our recruitment companies will use best endeavours to ensure our clients comply with the Equality Act and will not accept instructions that will result in unlawful discrimination.

Harassment

Harassment is when a hostile, humiliating, degrading, intimidating or similarly offensive environment is created in relation to a protected characteristic. We also consider it harassment for a worker to be subjected to unwanted conduct related to a protected characteristic which – as an intended or unintended consequence – violates their dignity.

For example, name calling, lewd comments, excluding colleagues, making insensitive jokes and displaying offensive or inappropriate material (including online). We deal in detail with harassment in our separate Bullying and Harassment Policy.

Victimisation

In a legal context, 'victimisation' has a much more restricted meaning than in real life. It happens when a worker has complained about harassment or discrimination, or has supported a colleague in their complaint, and is then treated less favourably as a result.

For example, an employee who is ostracised or dismissed at work because they spoke up on behalf of one of their colleagues in a harassment investigation.

Other Unlawful Actions

There are other actions which can be unlawful under equality legislation which apply specifically to disability:

Failure to Make Reasonable Adjustments

Failing to make reasonable adjustments to minimise certain disadvantages experienced by a disabled employee (or job applicant) can be unlawful.

For example, a person has a physical disability which makes it difficult to walk upstairs. They ask to be given an office on the ground floor. If this is a reasonable request and will remove or reduce the difficulty the person experiences, then it will be a reasonable adjustment to make, and an employer will be discriminating if they do not make it.

If an employee experiences difficulties at work because of their disability, they should contact the HR Team to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The HR Team may wish to consult with them, Occupational Health and their

medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate their needs where this is reasonable. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

In recruitment and selection there may be a requirement to make reasonable adjustments.

For example, it might be necessary to have different application procedures for partially sighted or blind applicants that enable them to use Braille.

With testing and assessment methods and procedures, tests can only be justified if they are directly related to the skills and competencies required for the job. Even then, it might be appropriate to have different levels of acceptable test results, depending on the disability.

For example, an applicant with a learning disability might need more time to complete a test, or not be expected to reach the same standard as other non-disabled applicants.

Treating Someone Less Favourably Because of Something Arising from Their Disability

Treating someone less favourably because of something arising from their disability (rather than the disability itself) without objective justification may also be unlawful.

For example, a person has a disability which means that they are absent frequently. If we tell them they should not attend a work social event because of their poor attendance levels, this will be discrimination arising from a disability unless we can show objective justification.

Medical Examination and Questionnaires

Certain roles may require individuals to undertake medical examinations for health and safety reasons and duty of care, where this is a requirement, it is for all employees and workers whether or not they are disabled.

Employees Who Become Disabled During Employment

If an individual becomes disabled whilst employed by us, we encourage them to inform us so that we can support them where appropriate.

Responsibilities and Duties

Everyone in our organisation is essential to the success of this Policy. We all have a legal responsibility to comply with it, and any of us – however senior or junior we are – may be 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 within the teams they manage.

The ethos and standards set out in this Policy can only be achieved and maintained if you cooperate fully and embrace its approach. It is also important that you understand you have a legal responsibility to comply with this Policy. If you breach it both you and the company may have to pay compensation to anyone who brings a successful claim against us. We expect you to take personal responsibility for following this Policy's aims and commitments and for bringing any actual or potential breaches to our attention.

Commitment to Equal Opportunities in Recruitment, Training and Development

We will conduct recruitment, promotion, and other selection exercises, such as redundancy selection, on the basis of merit, using fair and objective criteria and processes that avoid discrimination. Managers involved in these processes will have received appropriate training on equality and diversity.

How we Enforce this Policy and Handle Breaches

We will investigate any complaint or allegation raised regarding a potential breach of this Policy. If you believe you have been harassed or discriminated against, you should contact your line manager as soon as possible. If you wish to take formal action, please refer to our *Bullying and Harassment Policy* and follow the *Grievance Procedure*. Agency Workers/ Contractors working for a client, should follow our *Complaints Policy*.

You will face disciplinary action if we find you have harassed or discriminated against anyone else, in breach of this Policy. Sometimes, this type of behaviour may amount to gross misconduct, in which case we may dismiss you without notice.

Occasionally, complaints may be made in bad faith, where an individual knows them to be untrue, for example to avoid or deflect disciplinary action or performance management. We view complaints made in bad faith as misconduct which will normally result in disciplinary action. In some cases, this may lead to summary dismissal for gross misconduct. This does not apply to complaints made in good faith, even if they are not upheld. Employees who make complaints in good faith will not be victimised or treated less favourably as a result.

Training

To promote an environment free from discrimination, bullying, harassment and victimisation, we will ensure that our employees and managers receive relevant equality training which is refreshed annually.

How We Monitor Whether this Policy is Working

On a periodic basis, usually annually, we ask employees and workers for information relating to their protected characteristics. Providing this information is voluntary. We do this to:

- establish whether our Equality, Diversity and Inclusion Policy is effective in practice;
- ensure that our employment and recruitment practices are fair;
- analyse the effect of other Company policies and practices on different groups;
- highlight possible inequalities and where appropriate investigate their underlying causes; and
- take action where we consider it is necessary to address problems or reduce disparities.

This information is collected separately from applications and will not be used as part of the recruitment or selection process. The information is only used for monitoring purposes, to review the composition of our workforce and to promote workplace equality. All data will be stored and processed in line with our Data Protection Policy and Privacy Notice.

The HR Team will monitor the outcomes of any complaints raised under this Policy to identify any patterns of behaviour and assess the quality of investigations. We will use the information gathered to inform training, development and awareness activities as appropriate.

Related Policies

The following internal policies are referred to in this policy and provide additional information:

- Bullying and Harassment Policy
- Grievance Policy
- Complaints Policy
- Disciplinary Procedure
- Data Protection Policy
- Privacy Notice

Document Control

This policy will be reviewed annually and a record kept by the HR Team, only if changes are required will a new version be created and the policy be reissued.

VERSION	DATE	AMENDMENTS	APPROVED BY	SIGNATURE
6	Sept 2021	Updated layout, revised document control	Lisa Bacon	
7	Aug 2022	Policy reviewed and minor changes to wording made for clarity.	Lisa Bacon	
8	Oct 2024	Full policy review as a result of changes in legislation, leading to the majority of the policy being re-written to simplify and make easier to read.	Lisa Bacon	
9	Mar 2026	Minor updates made to improve clarity, consistency and readability, including terminology alignment and small wording amendments. No material changes to policy intent or application.	Paul Crompton	