

Equal Opportunity, Diversity & Inclusion Policy

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Our Commitment

TPP is proud to be a multi-cultural organisation. We are committed to promoting equality and diversity within an inclusive and supportive environment.

In particular, we will:

- ensure that all individuals are treated fairly, and with dignity and respect;
- ensure that opportunities we provide are open to all;
- promote diversity and inclusion by recognising the particular contributions that can be made by those with different backgrounds and experiences;
- create and maintain a safe, supportive and welcoming work environment for our employees, candidates and visitors that is free from harassment and bullying;
- strive to support our clients to meet their own diversity targets.

TPP wholeheartedly supports the principle of diversity, inclusion and equal opportunities in employment and opposes all forms of unlawful and unfair discrimination towards employees, candidates, customers and suppliers.

The Equality Act 2010 brought together what it calls "protected characteristics" under the one Act, and these are: race, sex, gender reassignment, marriage and civil partnership, pregnancy/maternity, religion or belief, sexual orientation, age, and disability. It is unlawful to discriminate against employees or candidates on these grounds.

We believe that it is in our own best interests, and those of our employees and candidates, to ensure that the people, talents and skills available throughout the community are considered when employment opportunities arise. We are committed to calling upon the widest range of knowledge, skills, and experience, complying with the relevant legislation and codes of practice, and achieving and maintaining a workforce that is representative of the local community in which we operate.

We take every possible step to ensure that individuals are treated equally and fairly and that decisions on recruitment, selection, training, promotion, and career management are based only on objective and job-related criteria. Decisions relating to clients and suppliers will be based on business-related criteria only and any irrelevant information will not form part of the process.

The policy aims to ensure that no job applicant, employee, or candidate should receive less favourable treatment on any grounds and wherever possible, they are given the help they need to attain their potential to the benefit of TPP and themselves and will extend to all aspects of our dealings with clients, suppliers and the general public.

TPP shall not discriminate unlawfully in relation to which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. TPP will ensure that each candidate is assessed only in accordance with the candidate's merits, qualifications, and abilities to perform the relevant duties required by the particular vacancy.

This policy is intended to assist TPP to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

The policy will be reviewed on an ongoing basis to judge its effectiveness and reflect changes in the law, demographics, and internal business requirements.

TPP Recruitment Diversity & Inclusion Statement

- TPP believes that ALL people have the potential to secure and retain fulfilling work
- TPP fully embraces Diversity and Inclusion and will continually work to break down barriers that are often facilitators of discrimination
- TPP wants all people to feel valued, empowered and feel they have the opportunity to change their lives by finding the job that is right for them
- TPP wants to represent real, authentic people who will thrive and flourish in their chosen careers

<u>Implementation</u>

It is the responsibility of TPP to promote equality of opportunity and diversity in employment and to monitor the implementation of this policy.

The COO/CEO are TPP's senior-level diversity and equal opportunities champions and as such are, on behalf of TPP, the individuals responsible for the effective operation of the policy.

TPP will ensure that the policy is effectively communicated and that proper training and guidance is given to ensure that everyone fully understands their responsibilities as set out both in the policy, codes of practice, and the legislation. A copy of this policy is available in our Handbook and on our website.

All employees have a responsibility to observe this policy and to ensure that diversity management and equality of opportunity are continuously provided for in TPP's activities.

In addition, Managers have a particular responsibility for ensuring the policy is fairly and consistently applied in all areas under their control.

Employees are encouraged to assist in the removal of any discriminatory practices that may exist in TPP by drawing them to the attention of management.

Types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another in comparable circumstances on a prohibited ground. An example of direct sex discrimination would be refusing to employ a woman because they were pregnant.

Indirect discrimination is where a provision, criterion, or practice is applied which is such that it would be to the detriment of a considerably larger proportion of the relevant group to which the individual belongs than to others, which is not objectively justifiable and which is to the individual's detriment. An example of indirect sex discrimination could be requiring everyone to work full time unless there is a good reason, unrelated to sex, as to why the particular job has to be done on a full-time basis since requiring everyone to work full time will normally adversely affect a higher proportion of women than men.

Harassment is where there is unwanted conduct related to one of the protected characteristics which had the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person, or is reasonably considered by that person to have the effect of violating his or her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him or her, even if this effect was not intended by the person responsible for the conduct.

Third party harassment is where employees are protected from harassment by people who are not employed in their organisation and whom they come into contact with during the course of their work. All protected characteristics are covered by this except pregnancy/maternity and marriage/civil partnerships. TPP will ensure that concerns about third party harassment are addressed swiftly and appropriately.

Discrimination by association is where direct discrimination takes place against someone because they associate with another person who possesses a protected characteristic. All protected characteristics are covered by this except pregnancy/maternity and marriage/civil partnerships.

Failure to make reasonable adjustments is where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

Discrimination arising from a disability is where someone is treated less favourably because of something connected to their disability, such as having an assistance dog.

Victimisation is where someone is treated less favourably than others because they have alleged unlawful discrimination or supported someone to make a complaint or given evidence in relation to a complaint.

Areas covered by the policy:

<u>Equal opportunities in employment – Code of Recruitment Practice</u>

- TPP will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.
- TPP is responsible for ensuring that no employee or job applicant receives less favourable treatment and that no employee or job applicant is placed at a disadvantage by requirements that are either directly or indirectly discriminatory.
- TPP has an open recruitment policy and can use a wide spectrum of different attraction methods e.g. job boards, press advertising, Internet and social media, local bespoke campaigns, job fairs, etc.
- TPP will never discriminate at the request of its clients, whether it is a direct or less clear request. The exception is where an Occupational Requirement has been established, eg to appoint a woman in a women's refuge. Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability.
- Job applicants will be asked to complete the appropriate online registration form and a separate, anonymous, optional, equal opportunities and diversity online monitoring form/survey. If completed, the latter is stored separately from the registration form and plays no part in the recruitment process. TPP Consultants are unable to access the equal opportunities and diversity information which is only used to monitor the effectiveness of its equal opportunities policy and those of its clients where applicable.
- Occasionally clients may request that we monitor equal opportunities and
 diversity information as part of a particular recruitment campaign for their own
 monitoring purposes and it may be a requirement for this information to be
 identifiable in order to track and report at different stages of the process. If this
 is the case, TPP will request this information through a separate survey
 specifically designed for that particular campaign and the information will be
 stored separately from the job application. TPP will request permission to share
 this data with the client in an anonymous format and providing any data will
 always remain totally optional.

- All information relating to equal opportunities monitoring is retained in line with UK GDPR where relevant, further details of which can be found in our Privacy Notice.
- All TPP employees required to select staff/progress candidate applications undergo appropriate training as part of the induction programme.
 Application forms and interview records will be kept in accordance with our Privacy Notice, after the completion of a recruitment campaign to ensure a detailed response can be given to those regretted candidates who challenge the fairness and objectivity of the recruitment process.
- TPP cannot lawfully discriminate in the selection of employees for recruitment or promotion, but TPP may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group which TPP identifies as being underrepresented in particular types of jobs.
- TPP recognises the need for working arrangements to be flexible enough to accommodate the shifting priorities of its staff and offer individuals a better fit between working lives and domestic arrangements.
- TPP will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if TPP considers it has good reasons, unrelated to any prohibited ground of discrimination, for doing so. TPP will comply with its obligations in relation to statutory requests for contract variations. TPP will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.
- TPP supports work-life balance through, for example, adoption, maternity and paternity leave, shared parental leave, flexible working hours, part-time working, and unpaid parental leave, all of which are outlined in other policies.
- Working hours may also be adapted to meet cultural or religious needs, such as prayer times and holy days. Flexible arrangements facilitate our retention of skilled and experienced workers and can contribute to an improved team working and enhanced individual output.

Religious or other beliefs

TPP recognises individuals' freedom of belief and the right to protection from intolerance.

Neither TPP nor its employees will discriminate against any religious or other beliefs, provided they do not run counter to this policy by advocating discrimination or

intolerance of other employees. TPP will endeavour to accommodate as far as practicable essential practices related to such beliefs provided that they neither breach Company policy nor interfere with the efficient running of the business or its legal obligations e.g. health and safety.

Disability

When assessing candidates to be put forward for a vacancy or assignment, TPP will not unlawfully discriminate against those with a disability.

The abilities of people with disabilities are recognised and valued at all levels of the organisation through:

- focusing on what people can do rather than on what they cannot
- challenging stereotypes about people with disabilities
- making appropriate and reasonable adjustments in the workplace to help people with disabilities achieve their full career potential.

HIV

Discrimination against an employee or potential employee on grounds that they have, or is thought to have, HIV or AIDS is not acceptable, and confidentiality will be respected in line with the wishes of an individual with HIV or AIDS.

<u>Gender</u>

All people regardless of their gender or gender identity are fully and properly represented and rewarded for their contribution at all levels of the organisation through:

- challenging gender stereotypes
- supporting employees in balancing their life at work and home
- supporting employees who become pregnant and taking active steps to facilitate their return to work after maternity leave.

<u>Transgender</u>

People who plan to undergo, are undergoing, or have undergone gender reassignment are protected against all forms of discrimination and harassment. TPP will take positive steps to support a transgender person and ensure they are treated with dignity and respect.

<u>Race</u>

The racial and cultural diversity of our communities is represented at all levels of the organisation through:

- challenging racial stereotypes
- understanding, respecting, and valuing different racial and cultural backgrounds and perspectives.

Sexual orientation

People are treated fairly at TPP irrespective of their sexual orientation through:

- respecting difference
- challenging negative stereotypical views.

Age

In assessing the ability of an individual to carry out a specific job, the assessment will be based on the requirements for that job. Age will neither be used to justify the appointment nor to debar an applicant from an appointment.

Age diversity within the workforce is promoted and valued through:

- challenging age stereotyping
- recognising the benefits of a mixed-age workforce.

Dignity at work

TPP will not tolerate harassment or intimidation of an individual. TPP has a separate Dignity at Work policy concerning issues of bullying and harassment on any ground, and how complaints of this type should be dealt with.

Clients, suppliers, and other people not employed by TPP

TPP will not discriminate unlawfully against clients using or seeking to use facilities or services provided by TPP.

Employees should report any bullying or harassment by clients, suppliers, visitors, or others to their managers who will take appropriate action (see "third party harassment" above).

<u>Liability</u>

Employers can be held liable in law for acts of discrimination committed by employees.

Individual employees can be held personally liable for acts of discrimination that they commit, authorise, contribute to, or condone.

Behaviour or actions by employees, which go against the spirit or letter of this policy, would constitute serious misconduct liable to disciplinary action, which may include summary dismissal.

The following are examples of such action; however, the list should not be seen as exhaustive:

- discrimination in the course of their employment against employees or job applicants in any aspect of employment or pre-employment on grounds established within the Equal Opportunities Policy Statement
- inducing or attempting to induce, employees or managers, to practice unlawful discrimination
- indulging in verbal or physical sexual or racist harassment of a nature which known, or should be known, to be offensive to the victim
- victimising individuals who have made allegations or complaints of sexual or racial discrimination or harassment or provided information about such discrimination or harassment.

Training and communication

TPP provides training and information for employees to ensure that they understand their position in law, TPP's equal opportunity, diversity and inclusion policy, and their responsibilities under this policy.

Where relevant external agencies and contractors offering services to TPP will be briefed on and expected to act in accordance with the policy.

Monitoring and review

This policy will be monitored periodically by TPP to judge its effectiveness and will be updated in accordance with changes in the law. Corrective action will be taken where appropriate.

In particular, TPP will monitor the composition of the existing workforce (to include employees and independent contractors) and of candidates for internal vacancies. If changes are required, TPP will implement them.

The provision of training and development opportunities through the management is monitored annually to ensure that there are no inequalities in either the content of the training or the opportunities for employees.

Reasons given for leaving TPP's employment are monitored to establish any retention problems related to inequality.

Grievance and Disciplinary Procedure

For complaints relating to this policy, TPP's grievance procedure should be referenced and followed. For complaints relating to bullying or harassment, the grievance procedure is modified as set out in the Dignity at Work policy.

TPP will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld unless your complaint is both untrue and made in bad faith.

Our commitment to the future

Alongside all the ongoing monitoring we carry out, we understand that although a Diversity and Equal Opportunities policy is a fundamental part of our operating strategy, it will only be brought to life if it is reinforced by focused and structured processes and measurements:

To this end, TPP:

- has identified a senior-level champion for leading the equal opportunities, inclusion, and diversity strategy and has secured top-level ownership and sponsorship for the diversity programme
- will join appropriate organisations to network, exchange best practice and raise TPP's profile
- will maintain and develop relationships with external bodies to assess progress
 (for example TPP has links with the following bodies Social Mobility Commission,
 Disability Confident, Evenbreak, ENEI, Diversity In Recruitment,) TPP is an active
 corporate member of Inclusive Employers
- will audit all processes to establish TPP's position with regard to best practice
- will integrate diversity further into mainstream training and development programmes
- will remain committed to the mental health and wellbeing of employees through
 access to mental health first aid, employee assistance programme, regular 1-21's, flexible working and other initiatives to support a healthy work life balance.
 Additionally TPP provide support and resources to candidates and employers,
 through newsletters and open communication.