



# Equality, Diversity and Inclusion Policy

For All Employees and Contractors at Ubico

## DOCUMENT HISTORY

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## Contents

1.	Introduction.....	3
2.	Scope .....	3
3.	Purpose.....	3
4.	What is equality, diversity and inclusion?.....	3
5.	Equality, diversity and inclusion at Ubico .....	4
6.	Responsibilities.....	5
7.	Ubico's commitment .....	5
8.	When does this policy apply? .....	6
	8.1 Recruitment .....	6
	8.2 Training .....	6
	8.3 Promotion .....	6
	8.4 During employment .....	6
9.	Equality, diversity and inclusion declaration.....	7
10.	Glossary of terms stated in the Equality Act (2010).....	8

## 1. Introduction

Ubico and its board are committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination by demonstrating its day-to-day behaviours and interactions with colleagues, stakeholders, suppliers and customers.

The aim is for our workforce to be truly representative of all sections of society, to have an inclusive culture contributing to a happy, productive working environment and for each employee to feel respected and able to give their best.

Ubico is also committed against unlawful discrimination of customers or the public.

## 2. Scope

The rights and obligations set out in this policy apply equally to all employees, whether part time or full time, on a substantive or fixed-term contract, and also to associated persons such as secondees, agency staff, contractors and others employed under a contract of service.

You have personal responsibility for the application of this policy. As part of your employee induction, you are expected to read and familiarise yourself with this policy, ensure that this policy is properly observed and fully complied with and to complete the declaration below (page 7).

## 3. Purpose

The policy's purpose is to:

- provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time;
- not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation;
- oppose and avoid all forms of unlawful discrimination; this includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

## 4. What is equality, diversity and inclusion?

Equality is about making sure people are treated fairly and given fair opportunities. Equality is not about treating everyone in the same way, but it recognises that individual's needs are sometimes best met in different ways.

Equality focuses on those areas covered by the law, namely the key areas of race, gender, disability, age, religion or belief and sexual orientation. People must not be unfairly discriminated against because of any of these factors and we must all contribute to creating a positive working environment where discriminatory practices and discrimination can no longer happen.

Inclusion is where people's differences are valued and used to enable everyone to thrive at work. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters, and they are able to perform to their full potential, no matter their background, identity or circumstances.

Diversity is the range of people in your workforce. For example, this might mean people with different ages, religions, ethnicities, people with disabilities, and includes men, women and transgender people. It also means valuing those differences.

## **5. Equality, diversity and inclusion at Ubico**

At Ubico, we consider that equality and inclusion mean breaking down barriers, eliminating discrimination and ensuring equal opportunities and access for all groups both in employment, and to goods and services.

We consider diversity to mean celebrating difference and valuing everyone. Each person is an individual with visible and non-visible differences, by respecting this everyone can feel valued for their contributions, which is beneficial not only for the individual but for the company as a whole.

Ubico is committed to promoting equality, diversity and inclusion in the following ways:

- Encouraging equality, diversity and inclusion in the workplace. This is best practice and makes sound business sense.
- Creating a working environment free of bullying, harassment, victimisation and unlawful discrimination. Promoting dignity and respect for all.
- Training our managers and all other employees about their rights and responsibilities under the Equality, Diversity and Inclusion Policy.
- Taking seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of Ubico's work activities. Such acts will be dealt with as misconduct under Ubico's grievance and/or disciplinary procedures, with appropriate action taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.
- Ensuring opportunities for training, development and progression are available to all staff, who will be helped and encouraged to develop their full potential. Taking decisions concerning staff based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Reviewing employment practices and procedures when necessary to ensure fairness and updating them and the policy to take account of changes in the law.
- Reviewing recruitment practices and procedures regularly to ensure that processes are in place to reduce the risk of unconscious bias.

- If an employee is disabled or becomes disabled, Ubico will consider what reasonable adjustments or support may be appropriate.

## 6. Responsibilities

All employees at Ubico are responsible for demonstrating the right behaviours to help the organisation provide equal opportunities in employment, and to prevent bullying, harassment, victimisation and unlawful discrimination.

All employees should understand that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment. This is regardless of whether this is against fellow employees, customers, suppliers and/or the public.

## 7. Ubico's commitment

Every employee is entitled to a working environment that promotes dignity, equality and respect for all. Ubico will not tolerate any acts of unlawful or unfair discrimination (including harassment) committed against an employee, contractor, job applicant or visitor because of a protected characteristic such as:

- sex
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including ethnic origin, colour, nationality and national origin)
- disability
- sexual orientation
- religion and or belief
- age

Discrimination on the basis of work pattern (part-time working, fixed term contract, flexible working) which is unjustifiable will also not be tolerated.

All employees will be encouraged to develop their skills and fulfil their potential and to take advantage of training, development and progression opportunities in Ubico. Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability.

No form of intimidation, bullying or harassment will be tolerated. If you believe that you may have suffered discrimination because of any of the above protected characteristics, you should discuss this with your line manager or another colleague in a relevant position of seniority.

Allegations regarding potential breaches of the Equality, Diversity and Inclusion Policy will be treated in confidence and investigated in accordance with the appropriate policy or procedure. This may be the Grievance Policy as it allows for informal resolution which may be the most efficient and effective process.

In all cases, Ubico will ensure that individuals who make such allegations in good faith will not be victimised or treated less favourably by Ubico as a result. However, false allegations of a

breach of this policy which are found to have been vexatious will be dealt with under Ubico's Disciplinary Policy.

A person found to have breached this policy may be subject to disciplinary action under Ubico's Disciplinary Policy.

Employees may also be personally liable for any acts of discrimination prohibited by this policy that they commit, meaning that they can be subject to legal proceedings.

## **8. When does this policy apply?**

This policy applies to all conduct in the workplace and also to conduct outside of the workplace that is related to your work (e.g. at meetings, social events and social interactions with colleagues) or which may impact on Ubico's reputation. (e.g. the expression of views on social media, contrary to the commitments expressed in this policy that could be linked to Ubico).

We set out below some specific areas of application:

### **8.1 Recruitment**

Selection for employment at Ubico will be on the basis of aptitude and ability. Where possible, Ubico will capture applicants' diversity demographics as part of its recruitment processes to promote the elimination of unlawful discrimination and ensure that any stereotypes, unconscious bias or prejudice does not play a part in recruitment decisions.

### **8.2 Training**

You may also be required to participate in training and development activities from time to time, to encourage the promotion of the principles of this policy.

### **8.3 Promotion**

All promotion decisions will be made on the basis of merit and will not be influenced by any of the protected characteristics listed above. Promotion opportunities will be monitored to ensure equality of opportunity at all levels. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to promotion.

### **8.4 During employment**

The benefits, terms and conditions of employment and facilities available to Ubico employees will be reviewed on a regular basis to ensure that access is not restricted by unlawful means and to provide appropriate conditions to meet the special needs of disadvantaged or under-represented groups.

## 9. Equality, diversity and inclusion declaration

I have read and understood Ubico's Equality, Diversity and Inclusion Policy and agree to work to the expected standards. Regardless of my background and circumstances, I agree to treat all colleagues and visitors with respect and dignity while carrying out the duties and responsibilities of my role at Ubico.

Signature .....

Date.....

Print name.....

**Please return this to your line manager**

## 10. Glossary of terms stated in the Equality Act (2010)

### **Age**

The Act protects people of all ages. However, different treatment because of age is not unlawful direct or indirect discrimination if the employee can justify it, i.e., if the person can demonstrate that it is a proportionate means of meeting a legitimate aim.

### **Disability**

Under the Act, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

### **Gender reassignment**

The Act provides protection for transsexual people. A transsexual person is someone who proposes to, starts or has completed a process to change his or her gender.

### **Marriage and civil partnership**

The Act protects employees who are married or in a civil partnership against discrimination. Single people are not protected.

### **Pregnancy and maternity**

A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and any statutory maternity leave to which she is entitled.

### **Race**

For the purposes of the Act 'race' includes colour, nationality and ethnic or national origins.

### **Religion or belief**

In the Equality Act, religion includes any religion. It also includes a lack of religion, in other words those who do not follow a certain religion or have no religion at all. Additionally, a religion must have a clear structure and belief system. Belief means any religious or philosophical belief or a lack of such belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour.

### **Sex**

Both men and women are protected under the Act.

### **Sexual orientation**

The Act protects bisexual, gay, heterosexual and lesbian people.

### **Direct discrimination**

Direct discrimination occurs when someone is treated less favourably than another because of a protected characteristic they have or are thought to have (see perception discrimination below), or because they associate with someone who has a protected characteristic (see discrimination by association below).

### **Discrimination by association**

This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

### **Perception discrimination**

This is 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 but are perceived as doing so.



**Indirect discrimination**

Indirect discrimination can occur when you have a condition, rule, policy or even a practice that applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if the employee can show that you acted reasonably in managing your business, i.e., that it is 'a proportionate means of achieving a legitimate aim'.

**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'. Employees are also protected from harassment because of perception and association

**Third party harassment**

The Equality Act makes you potentially liable for harassment of your employees by people (third parties) who are not employees of your company, such as customers or clients. You will only be liable when harassment has occurred on at least two previous occasions, you are aware that it has taken place, and have not taken reasonable steps to prevent it from happening