



WILSON JAMES POLICY STATEMENT

Policy Title	Equality, Diversity and Inclusion	Policy No.	HR09
Owner	Chief of Staff	Date Issued	Aug-11
Author	HR Operations Director	Date Reviewed	Mar-25
Scope	This Policy applies to all sectors and functions of Wilson James business		
Responsibility	The Policy owner is responsible for ensuring that this policy remains current and up to date and shall formally review the policy on an annual basis		

POLICY

1. Policy Statement

At Wilson James we are committed to building a culture of equality, diversity and inclusion where the unique experiences, skills and insights of our people are valued and included, making our business stronger, more innovative and insightful and fully embracing our values so that everyone who works for, or with, Wilson James is consistently valued and respected. Wilson James is committed to valuing and promoting equal opportunities in all areas of recruitment, employment, training, and promotion.

Wilson James' core values incorporate honesty, dignity, respect, and responsibility for our actions in an environment where we expect supportive and inclusive teamwork within our organisation and in partnership with others. We require all our people to treat each other, the public, and our customers with respect, and we want to maintain a working atmosphere in which everyone delivers a high-quality service.

We will aim to provide equality of opportunity in employment to all persons and we will not discriminate unlawfully against our job applicants or employees on any of the protected equality characteristics under the Equality Act 2010 which are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

When making recruitment and selection decisions we will aim to select the best person for the job and all decisions will be made objectively and lawfully. Likewise we will follow the same principles when making other employment related policies and decisions, such as those relating to pay and benefits, opportunities for promotion and training, flexible working arrangements, absence and performance management and, if necessary, redundancy.

We will provide fair and open access to development opportunities in order to fully utilize the talent of all employees.

We will promote a good and harmonious working environment in which our employees will be treated with dignity and respect. We will not tolerate harassment on the protected equality grounds or bullying.

When appropriate, we will take lawful positive action under the Equality Act 2010 to encourage participation from groups that are under-represented in our workforce.

2. Purpose

This policy reinforces the behaviours that Wilson James expects to see in every employee.



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Wilson James recognises the contribution of a diverse labour force. Equality legislation sets minimum standards, and the company wants to go beyond ticking boxes. In promoting equality, the company wants everyone to have access to jobs, training, and development opportunities and for all people to be treated fairly.

Embracing diversity means that the company acknowledges the full breadth of people who work for Wilson James and that variety is reflected within our staffing complement.

Inclusion means that everyone that works for Wilson James has a contribution to make, and the company will work to create the kind of environment that will be receptive, welcoming, and inclusive of all its employees.

By making sure Wilson James promotes equality, diversity, and inclusion it will be helping everyone to perform at their best and realise their potential.

3. Policy Principles

The company will ensure that this policy is put into practice by developing an overarching equality, diversity, and inclusion strategy, linked to our business objectives and corporate strategies. The following principles underpin the policy:

- **Promote awareness:** Provide regular communication about equality, diversity, and inclusion.
- **Measuring impact:** Establish monitoring systems that enable the business to understand where it is making progress and where it needs to improve.
- **Learning:** Provide ongoing training and development on the positive impact of equality, diversity, and inclusion.
- **Protection:** Create an environment where people can challenge any potentially discriminatory behaviors and not be treated less favourably for doing so.
- **Leadership:** Managers and key decision makers will be trained about equality legislation and its key implication on the business.
- **Equality:** Opportunities for employment, promotion, transfer, and training will be advertised widely. All applicants will be welcomed, irrespective of any characteristic protected by law.
- **Zero tolerance:** Complaints about discrimination, harassment or bullying will be regarded seriously and investigated, which may result in disciplinary sanctions, and even dismissal.

4. Scope

This policy applies to all workers, including employees, agency workers, contractors, apprentices, those on fixed terms or permanent contracts, job applicants and Board and Committee members. This policy applies during any work-related activity including during work related social events, business events or business trips. This policy should be read in conjunction with our Anti Harassment and Bullying Policy and Procedure and our Grievance Policy and Procedure.

5. Responsibilities

Managers shall:

- Lead by example and promote an organisational culture that is supportive of the benefits of equality, diversity, and inclusion.



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- Ensure that this policy is implemented and communicated to all existing employees and new employees when they begin working for the company.
- Promote a professional and positive work environment by being inclusive and open, and challenging behaviour or decisions that breach this policy.
- Actively promote equal opportunities within the departments for which they are responsible.
- Identify the various behaviours and barriers that discrimination can take and understand the negative effect these can have on the company and its employees and customers.
- Dispel the myth that only certain types of people are suitable for certain types of jobs or training.
- Monitor the application of the equality, diversity and inclusion policy, and work towards eliminating any discriminatory practices which may be limiting the company's ability to achieve its objectives, thereby maintaining our reputation as a fair and responsible employer in the eyes of the company's employees, shareholders, customers, and the public.
- Take accountability for the timely and appropriate action to address and resolve bullying and harassment, and discrimination in their work area, in line with the Discipline and Grievance policies and procedures.

Employees shall:

- Comply with the letter and spirit of this policy.
- Treat all colleagues, the public and our customers with fairness, respect, dignity, and honesty
- Understand the values and benefits of equality, diversity and inclusion and be aware of the various behaviours and barriers that discrimination can take, understanding the negative impact these can have on the Company, customers, and colleagues.
- To be sensitive to the potential impact of their own behaviour on colleagues, customers, and job applicants.
- Tell their line manager about any instances of discrimination, or any perceived problems in relation to employment, or potential discrimination in the way that we provide our services.
- To co-operate with management in the elimination of any discriminatory practices that may be identified.

PROCEDURE

6. Managing Workplace Diversity

'Managing Workplace Diversity' is a more effective way of dealing with equal opportunities issues. It emphasises the business and personal benefits that accrue from valuing the differences between people, rather than just complying with the law. Organisations that grasp the additional business opportunities generated by managing diversity effectively are far more likely to enjoy sustained competitive advantage than those who do not.

Why is it important?

- It is against the law, in particular the Equality Act 2010, to discriminate directly or indirectly in recruitment or employment because of a protected characteristic.
- It is essential that we attract and retain the most talented people to continue to compete successfully. Skills and ability are not, for example, the preserve of one ethnic group or one gender; by recognising this we can widen our recruitment pool and maximise the potential of our existing employees.
- We are committed to providing service excellence to all our customers and we believe that this can be better achieved by a workforce that values and reflects the diversity of our society.



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- We operate in an increasingly diverse society. In order to enhance business opportunities, we should reflect and value that diversity in our advertising, marketing and sales strategies.
- It has been established that employees' motivation and commitment increase if people feel valued and perceive that they are being treated fairly. Evidence from a range of sources also indicates that diversity results in more creativity and higher productivity.

7. Recruitment, advertising, and selection

The recruitment process will result in the selection of the most suitable person for the job in terms of relevant experience, abilities, and qualifications. The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, to attract applications from all sections of the community, the company will, as far as reasonably practicable:

- Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.
- Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.
- Where possible every effort will be made to recruit from areas which are under-represented within Wilson James.
- Ensure that a criminal conviction is not necessarily seen as a bar to obtaining a position and that each case will be assessed on an individual basis.

Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing, and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, and with existing employees who are disabled or regarded as disabled in line with the Equality Act 2010, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria, and practices or to physical features of work premises or to provide aids or services to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

8. Promotion and Career Development

When making decisions on promotions and career development, managers should focus on the employee as an individual, with particular talents and experiences, rather than make assumptions based



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on their age, race, gender, marital status, disability or any of the other equality grounds. Promotion and career progression will be informed by our Management Capability Framework, a framework which outlines the knowledge, skills and behaviours needed to be a manager at Wilson James. Please refer to our Learning & Development policy for further information.

The role of learning and development is to improve performance in the job, to develop skills, and to prepare individuals for other roles and responsibilities. Managers should focus on the development needs of individuals. For example, priority should not be given to training a man in preference to a woman, and it should not be assumed that family commitments of either men or women will limit their career ambitions.

All training materials should be checked to ensure that the language and images used in them reflect the diversity of our employees and customers. Every effort will be made to accommodate the specific needs of disabled employees. A range of training options and media will be offered to ensure that all employees have equal access to training irrespective of location or hours of work.

9. Flexible Working

Flexible working, such as job-sharing, can also assist the Company to retain the skills of valued employee's who wish to continue their careers but who may have, for example, caring responsibilities outside of work.

10. Discrimination

Direct discrimination occurs when, because of one of the protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation), a job applicant or an employee is treated less favourably than other job applicants or employees are treated or would be treated.

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated and not on the job applicant's or employee's own protected characteristic. In addition, it can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not.

The Company will take all reasonable steps to eliminate direct discrimination in all aspects of employment.

11. Indirect discrimination

Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees, but which is discriminatory in its effect on, for example, one gender identity or racial group.

Indirect discrimination occurs when a provision, criterion, or practice (PCP), is applied to the job applicant or employee which is discriminatory in relation to a protected characteristic. A PCP is discriminatory if:

- It puts, or would put, the job applicant or employee at that disadvantage,
- It cannot be shown by the company to be a proportionate means of achieving a legitimate aim.

The Company will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.



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12. Genuine Occupational Requirement

In some instances, there may be a genuine occupational requirement or qualification which may be applied for a specific position e.g., female search officers.

When applying a genuine occupational requirement in a job advert Wilson James must be careful to ensure there is clear justification for its inclusion, otherwise they could be liable for a discrimination claim.

The Company must decide whether a genuine Occupational requirement may apply before advertising the job. In very limited circumstances if the company can show that someone with a protected characteristic (on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) is central to a particular job then it can insist that only someone with that protected characteristic is suitable for the job. For example, if a security officer is required to complete searches on a female, then there would be a genuine occupational requirement for female security officers.

13. Bullying and Harassment

Our Anti-Harassment and Bullying Policy and Procedure sets out Wilson James' aim to prevent bullying and harassment from taking place. Should bullying and harassment happen, the policy aims to help us identify it, report it, resolve it and learn from it.

Wilson James is committed to zero tolerance of any form of harassment, including sexual harassment, and provides a number of ways in which to report such behaviour and to encourage staff to raise issues. Speaking up and challenging unacceptable behaviours means that we can take swift and early action to resolve concerns around bullying and harassment. We want to create a high-performance culture where everyone feels that they can contribute without fear of bullying or harassment.

Our Code of Conduct and Capability Framework set out the clear behavioural standards and expectations that we commit to as part of this team. Everyone's behaviour must contribute to the positive working environment that we aspire to. It is the responsibility of all staff to act to create a culture free from bullying and harassment. Everyone can take action should inappropriate behaviour occur. Our Leaders have an additional responsibility to reinforce the standards of behaviour we aspire to be role modelling professional and inclusive behavioural standards and taking prompt action to tackle bullying should it occur.

14. Grievance and Discipline

If any employee believes that they have been unfairly discriminated against they should make a complaint using the company's grievance procedure. Likewise, if any employee is found to have breached this policy, they may be subject to disciplinary action under the disciplinary procedure, which in serious cases may result in dismissal.

15. Monitoring

Records will be maintained in the Recruitment Applicant Tracking System of the age, race, gender, sexual orientation, marital status, and disability of successful job applicants and existing employees. However, it is the responsibility of managers to apply this policy at local level. Any patterns of under representation (for example, where one gender or race appears to have a consistently reduced chance of promotion)



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should be fully investigated in conjunction with Human Resources, and any discriminatory practices identified and eliminated.

The company will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

16. Compliance

Compliance with this policy is the responsibility of every Wilson James employee.

17. Further Guidance

For further guidance please contact the Human Resources department.

Documents Related to this Policy

HR07 - Aggression and Violence
HR08 - Learning & Development
HR18 - Flexible Working
HR32 - Disciplinary
HR33 – Grievance
HR40 – Anti Harassment and Bullying
HR41 – Carers
HR42 - Menopause

A handwritten signature in black ink, appearing to read 'Nick Channer'.

Nick Channer OBE
Chief of Staff
Wilson James Ltd