



PASSION. DETERMINATION. LEADERSHIP

Integrated Management System		Date	25/03/24
Title	Equal Opportunities, Diversity, Inclusion & Belonging Policy	Issue	22
Ref	IMSM.005	Approved	N. Catton

Equal Opportunity, Diversity & Inclusion Policy Statement

Purpose

The organisation is committed to providing equal opportunities in employment and to avoiding unlawful discrimination in employment and against customers and all stakeholders. As part of this commitment, the organisation aligns all policies, procedures, and practices to the BS ISO 30415:2021 Human Resources Management – Diversity and Inclusion standards and are audited to demonstrate compliance to this standard.

This policy is intended to assist the organisation to put this commitment into practice. Compliance to the relevant Equality Acts and this policy should also ensure that employees do not commit unlawful acts of discrimination.

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. The organisation has a separate dignity at work policy, which deals with these issues.


It is essential that organisational services and opportunities are accessible and can be used by everyone and that procedures in place to accommodate specific needs of individuals to enable people with differing abilities to gain access to work and contribute to the organisation.

The law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, gender identity or expression, pregnancy, maternity, background, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief or lack of religion, parental status, because someone is married or in a civil partnership and membership of the travelling community. These are known as "protected characteristics".

Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.

It is unlawful for an employer to fail to make reasonable adjustments to its requirements, working practices or the physical features of the workplace where these put a disabled job applicant or employee at a substantial disadvantage. It is also unlawful discrimination where a disabled employee is at a substantial disadvantage due to the employer's unreasonable failure to provide an auxiliary aid or service to the disabled employee.

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Staff should not discriminate against or harass a member of the public in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation, or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

CIS Values

CIS culture of diversity, inclusion & belonging values each employee on their contribution to the business and offers an environment where all employees can progress and achieve a satisfying career based on merit and ability alone. CIS acknowledges that everyone has a different background, culture, and values and that the diversity this generates stimulates creativity, innovation and a breadth of knowledge within our organisation.

Through CIS Citizenship, effective good management practices, we understand the importance and benefits of creating a diverse and multi-cultural workforce both visually and non-visually and how this keeps the pool of our skills, knowledge, and experience fresh, fostering greater effectiveness in our business and in the services, we provide our customers. We recognise that our colleagues are our most valuable assets and the importance of recognising their individual strengths and weaknesses in terms of skills and personal traits.

By creating a positive multi-cultural environment, we can reflect today's multi-cultural society and the changing social and economic patterns in the workforce, which will assist in our aim of being an Employer of Choice.

Everyone should have a decent workplace environment to be able to perform at their best, in conditions of freedom, equity, security and human dignity.


Manager's Responsibility

Every manager is accountable for the implementation and continuous delivery of our Equal Opportunities, Diversity, Inclusion & Belonging Policy, procedures, and management practices. Leaders must be committed to our ED&I principles and everyone's behaviours must be consistent with the shared values and beliefs of the organisation. Any instance of doubt about the purpose, application of the policy, or other questions, should and will be addressed to the HR Director, as should any requests for special coaching or training relating to the deliverance of these practices.

Employee's Responsibility

Every employee is responsible to support the Company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence. Acts of discrimination, harassment, bullying or victimisation against employees or clients are disciplinary

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offences and will be dealt with under the Company’s disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute as gross misconduct and could lead to dismissal without notice.

Working Environment

CIS encourages a working environment where you are encouraged to achieve your potential. We understand and respond to the full range of diversity and quality issues. All employment related decisions in terms of recruitment advertising, selection, training, and conditions of work, pay, and career development and selection for redundancy to every other aspect of employment are based on objective, non-discriminatory job-related criteria and are consistently applied. We also apply our policies to the treatment of our customers and stakeholders.

We continuously monitor and regularly review our resourcing, training development and people relations practices to ensure equality is a key factor and to ensure the diversity of our workforce. We feel that diversity is important in enacting our social responsibility as a company. By participating in external initiatives in local areas such as recruitment and training programmes we can provide a service to the local community by improving skill gaps and unemployment statistics.

The organisation will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy.


ERG

CIS encourage its colleagues to join an Employee Resource Group, such as the CIS Citizenship forum, Armed Force Covenant committee or Wellbeing group. They consist of a diverse group of CIS colleagues who join in a network to share experiences and ideas to promote diversity, inclusion and belonging in the workplace. These groups are supported by a Company Board of Directors, each ERG are elected a Chair, Co-Chair and member of the executive Board as their team sponsor. Inclusivity and a sense of Belonging is essential for the ERG to function. Everyone is accepted, welcomed and their thoughts, ideas and contributions are valued. Activities are shared amongst the groups for maximum diverse creating thinking, everyone can influence change and company direction.

Recruitment and Promotional Practices:

Effective recruitment and selection of capable employees is fundamental to the success of the organisation. The Company is committed to a policy of long-term employment. Before recruiting additional employees, every effort will be made to ensure that existing employees will have the opportunity to apply for these positions. This is achieved by advertising internal vacancies on our Internal Vacancy Bulletin and emailing job roles to individual personal email addresses.

Recruitment procedures are in place to ensure that selection is based on the applicant’s skills, experience, competence, and aptitude for the vacancy, irrespective of their gender (including pregnancy), religion or belief, marital status, age, race, ethnic origin, colour, disability, sexual

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orientation, civil status, gender reassignment, as well as characteristics related to socio-economical context.

The selection process is of crucial importance and will be carried out per objective job-related criteria. This will apply to job description, person specifications, advertising, recruitment sources, and interview techniques. Ability assessments are used during the interview process to assess basic written, reading, spelling, punctuation, and numeracy skills. All tests are non-discriminatory and reasonable adjustments will be made to individuals with learning disabilities such as dyslexia.

Training and Development Practices:


The organisation will provide training to all existing and new employees and others engaged to work at the organisation to help them understand their rights and responsibilities under this policy and what they can do to help create a working environment free of bullying and harassment.

All new employees will be expected to undergo the Company Induction Programme as part of the selection criteria. Edapp, our Learning Management System provides company mandatory training on EDI, Sexual Harassment, Bullying & Harassment. These courses form part of the probationary process and must be completed thereafter on an annual basis. Line management are responsible for monitoring the completion of these courses. Selection for enhanced training opportunities will be based on job related criteria. All training courses are certificated, all classroom activities, assessment and examination processes are based on non-discriminatory criteria, reasonable adjustments will be made for individuals with learning disabilities.

Managers undertake enhanced Equality and Diversity Awareness Training as part of their management training, additional one-to-one follow up sessions are conducted by their dedicated ER Advisor and/or the Colleague Development team. Managers are encouraged to coach their teams on Equality & Diversity within the workplace. The organisation will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

The organisation will provide specific training on equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

The organisations Appraisal System is based on Meaningful Performance Conversations (MPC) which focuses on Themed Competencies (TC) aligned to the organisations core values. Performance is measured on behaviours and skills; technological knowledge combined with soft skills to meet performance goals. The Appraisal system is accessible via The Hub which allows for full transparency, consistency and inclusive; it is designed to encourage a high-performance culture. Through having MPC, the Company will be able to identify individual achievements whilst recognising any skill shortages that require further development. The system is fair and transparent and non-discriminatory. All appraisers are fully trained on conducting objective performance appraisals.

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Disciplinary and Grievance Handling:

The Company ensures a fair, systematic and non-discriminatory approach to the enforcement of standards of conduct affecting all members of staff employed by the company. All disciplinary and grievance matters will be handled in a professional and non-bias manner, and all information obtained will be treated in the strictest of confidence and handled in accordance with the legislative requirements of either the ACAS Codes of Practice (UK), or Section 42 of the Industrial Relations Act (Code of Practice on Grievance and Disciplinary Procedures) (Ire).

If you consider that you have been unlawfully discriminated against, you may use the Company's grievance procedure to make a complaint. The Company will take any complaint seriously and will seek to resolve any grievance which 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.

Disabled Workers:

Any worker that has a health condition or impairment, either physically or mentally during their employment with CIS will not be treated less favourably than a non-disabled employee. Under the Disability Discrimination Act 1995(UK), and the Employment Equality Act 1998 (Ire), CIS will take reasonable steps to accommodate with adjustments. Wherever possible, the Company will adjust their existing employment or offer redeployment opportunities. Appropriate training will also be available to enable them to remain in employment with the Company.

Failure to make reasonable adjustments:


If where a physical feature or a provision, criterion or practice puts a person with health conditions or impairment at a substantial disadvantage compared with someone who does not have that disability and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Dignity at work

The organisation has a separate dignity at work policy concerning issues of bullying and harassment on any ground, and how complaints of this type will be dealt with, please refer to the Dignity At Work policy for full details and guidance.

Customers, suppliers, and other people not employed by the organisation.

The organisation will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the organisation. Employees should report any bullying or harassment by customers, suppliers, visitors, or others to their manager who will take appropriate action. Any concerns and or complaints will be managed in accordance with CIS Equal Opportunities, Diversity & Inclusion policy IMSM.005.

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Harassment and Bullying:

The Company deplores all forms of harassment whether it is non-verbal, verbal, or physical and seeks to ensure that the working environment is sympathetic to all its employees.

Sexual and racial harassment at work is unlawful, and both the Company and the harasser may be held liable for such unlawful actions. Harassment creates a threatening environment and will be dealt accordingly. All staff has the right to work in an atmosphere free from sexual or racial harassment.

Bullying is not dissimilar to harassment. However, it usually involves the misuse of power or intimidation, leaving the individual feeling hurt, vulnerable, threatened, disengaged, angry or helpless. All forms of bullying will be treated seriously and dealt with in accordance with Company procedures.

Examples of Sexual Harassment include:


- a) Insensitive jokes and pranks
- b) Lewd comments about appearance
- c) Unnecessary body contact
- d) Displays or sexually offensive material, e.g. pin-ups
- e) Requests for sexual favours
- f) Speculation about a person's private life and sexual activities
- g) Threatened or actual sexual violence
- h) Threat of dismissal, loss of promotion, etc for refusal of sexual favours.

2. *Examples of Racial Harassment include:*

- a) Insensitive jokes related to race
- b) Pranks
- c) Deliberate, exclusion from conversations
- d) Abusive, threatening, or insulting words and behaviour
- e) Displaying abusive writing and pictures

All the examples above are not exhaustive. The Company treat harassment very seriously and will use the disciplinary procedure as appropriate, which could result in dismissal. Items 1(g), 1(h) and 2(d) are examples of gross misconduct, punishable by summary dismissal, but other items may constitute gross misconduct depending on the circumstances of the case in question.

The Company recognises the sensitive nature of complaints of sexual harassment. Female employees that wish to discuss such complaints, in confidence, should contact their dedicated ER Advisor at Head Office or another female member of the HR Department. Male employees should contact a Male member of the HR team and/or Operations Manager.

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Religious or Belief Employment Practices

At CIS, we recognise individual's religious beliefs and their association with that belief. We ensure that no individual will suffer less favourable treatment based on their religion or belief during their application or employment within the Company.

We will support their commitment to their belief by trying to accommodate their preferred working arrangements. If a person is a member of the Seventh-Day Adventist Church and needs to leave early on a Friday to worship, we will try to accommodate this request. The Company keeps abreast of all key dates of religionist festivities to ensure that the members of staff whose beliefs require them to be away from the working environment on these specific days are accommodated.

Flexible Working Arrangements

CIS will genuinely consider flexible working arrangements in accordance with the Flexible Working Regulations 2014 (UK) and the EU Work-Life Balance Directive (Ire).

We recognise the spirit and practical implications of having a flexible working environment. By offering flexible working arrangements we can widen the pool of talented applicants and not suffer from self-selection or be in breach of indirect discrimination. We also understand the benefits of promoting flexible working practices through increased productivity levels, motivation, staff retention and reduced absence levels.

Pay


The Company is committed to ensure that both men and women that are doing equal work and work related of equal value are entitled to equal pay in accordance with the Equality Acts. CIS pay structure is site and job-related pay and any person(s) regardless of their gender will receive the correct pay for the work which is carried out for that site and or/position.

Grievances

If you consider that you may have been unlawfully discriminated against, you may use the organisation's grievance procedure [bullying or harassment procedure] to make a complaint. If your complaint involves bullying or harassment, the grievance procedure is modified as set out in the dignity at work policy & or CIS Equal Opportunities, Diversity & Inclusion policy IMSM.005

The organisation 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.

Use of the organisation's grievance procedure does not affect your right to make a complaint to an employment tribunal (UK), or the Workplace Relations Commission (Ire). Complaints to an employment tribunal must normally be made within three months beginning with the act of discrimination complained of. This time limit is increased to six months for complaints to the WRC in Ireland.

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Monitoring:

This policy will be monitored periodically by the organisation to judge its effectiveness and will be updated in accordance with changes in the law. In particular, the organisation will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, the organisation will implement them. Including Risk assessment and disparities – preventative measures.

The organisation treats personal data collected for reviewing equality of opportunity in recruitment and selection in accordance with its (Data Protection) Policy. Information about how data is used and the basis for processing is provided in the organisation's DPA Privacy Notice.

Types of Unlawful Discrimination:

Direct discrimination is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.


Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) which are covered by direct discrimination provisions in the Equality Acts) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether this effect was intended by the person responsible for the conduct.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Acts, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare their treatment with someone who has not made or supported a complaint under the Equality Acts. For example, if a blind employee raises a grievance that

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the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation.

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

BS ISO 26000 Social Responsibility:

Human rights are the basic rights to which all human beings are entitled. There are two broad categories of human rights. The first category concerns civil and political rights and includes such rights as the right to life and liberty, equality before the law and freedom of expression. The second category concerns economic, social, and cultural rights and includes such rights as the right to work, the right to food, the right to the highest attainable standard of health, the right to education and the right to social security. Various moral, legal, and intellectual norms are based on the premise that human rights transcend laws or cultural traditions. The primacy of human rights has been emphasized by the international community in the International Bill of Human Rights and core human rights instruments. More broadly, organizations will benefit from a social and international order in which the rights and freedoms can be fully realized.

While most human rights law relates to relationships between the state and individuals, it is widely acknowledged that non-state organizations can affect individuals' human rights, and hence have a responsibility to respect them.

This policy will be monitored periodically by the organisation to judge its effectiveness and will be updated in accordance with changes in the law and industry standards. Employees that fail to adhere to this policy may be subject to the organisation's formal disciplinary procedures.

Approved



Date

27.03.17

Managing Director
Reviewed Date: 25/03/24