

Equality, Diversity & Inclusion Policy

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The following policy is non-contractual

1. Introduction

Keys Group is committed to encouraging equality, diversity and inclusion among our colleagues and job applicants, and eliminating unlawful discrimination.

This policy identifies what are considered protected characteristics, the Company's approach to equality and inclusion in the workplace and the action that will be taken if discrimination is evidenced in the workplace.

The aim is for our workforce to be truly representative of all sections of society and for each colleague to feel respected and able to give their best.

2. Purpose

This policy's purpose is to:

- a. Provide equality, fairness and respect for all colleagues, whether temporary, part-time or full-time
- b. 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
 - sexual orientation
- c. Oppose and avoid all forms of unlawful discrimination. This includes in:
 - pay and benefits
 - terms and conditions of employment
 - dealing with grievances and discipline
 - dismissal
 - redundancy
 - leave for parents
 - requests for flexible working
 - selection for employment, promotion, training or other developmental opportunities

Keys Group will ensure that no colleague or job applicant is treated less favourably on the basis of any protected characteristic, perceived protected characteristic or association with another who has a protected characteristic.

3. Commitments

Keys Group commits to:

1. Encouraging equality, diversity and inclusion in the workplace
2. Creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all colleagues are recognised and valued.

This commitment includes training managers and colleagues about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include colleagues conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All colleagues should understand they, as well as Keys Group, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow colleagues, customers, contractors and the public.

3. Taking seriously complaints of bullying, harassment, victimisation and unlawful discrimination by colleagues

Such acts will be dealt with as misconduct under Keys Group's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, 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.

4. Making opportunities for training, development and progress available to all colleagues, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
5. Making decisions concerning colleagues based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
6. Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
7. Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in this policy.

Monitoring will also include assessing how this policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

4. Colleague Responsibility

Every colleague of Keys Group has an obligation to promote an equal opportunity environment. As a colleague, you have a duty to observe and apply this policy at all times. In particular you must not:

- Discriminate against or harass colleagues, service users, customers, contractors, visitors or job applicants;
- Discriminate against or harass members of the public in the course of your duties, irrespective of whether such conduct occurs on company premises;
- Induce, or attempt to induce, others to practise unlawful discrimination;
- Victimise individuals who have made allegations or complaints of discrimination or harassment, or who have provided information about discrimination or harassment.
- Violation of this policy is a serious offence and could result in disciplinary action and/or summary dismissal.

5. Supporting Colleagues

We recognise there are other areas of diversity not yet considered protected characteristics which we aim to support and include in the Inclusion Strategy e.g. neurodiversity and menopause.

6. Grievance Procedure

Where a complaint is raised relating to unfair treatment, selection, availability of training or general treatment at work that is connected to a protected characteristic the grievance procedure will be invoked. As with any grievance matter the complaint will be addressed without unreasonable delay and will be handled sensitively by an appropriate manager.

If during the investigation the matter is proved and harassment or discrimination is evidenced then disciplinary action is likely to ensue for the perpetrator of this behaviour. Depending upon the severity of the case this may be considered gross misconduct and therefore sanctions could be issued up to, and including, dismissal.

Where the colleagues concerned work closely together, the disciplinary chairperson will carefully consider how the working relationship can be repaired. This may include suggestions of mediation or the transferring of one of the parties to another department or service.

As with all other grievances there will be a right to appeal which will be carefully outlined to the colleague concerned. If matters have not been satisfactorily addressed you are encouraged to use this route.

For further detail on the grievance process please see the Grievance Policy and Procedure.

7. Inclusion Forum

Monitoring of Keys progress relating to inclusion will also be conducted through Keys' Inclusion Forum. The forum consists of thirteen colleagues representing all parts of the organisation who meet bi-monthly to support Keys in meeting its objectives as detailed in the Workforce Diversity and Inclusion Strategy. This broadly includes raising awareness,

reviewing performance and sharing the experience of colleagues and stakeholders across Keys on inclusion. An annual Keys Inclusion Report will be completed as a record of progress made each year.

8. Mandatory Training

During induction, all colleagues are required to attend mandatory training on '*Equality and Diversity*' with periodical refresher training scheduled by the HR and Learning and Development departments.

9. Data Protection and Records

In order to understand fully how Keys Group processes any information provided to us, colleagues are referred to our privacy notice on the Keys Group website. The company will strictly adhere to, and be guided by, the new GDPR regulations in order to collect, process and store personal information to ensure compliance.

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of personal information. We will store all personal data in accordance with the privacy policy.

We will not hold personal information in an identifiable format for any longer than is necessary.

10. Equality Impact Statement

All relevant persons are required to comply with this policy and must demonstrate sensitivity and competence in relation to diversity with regard to all aspects of the protected characteristics.

If you, or any other groups, believe you are disadvantaged by this policy please contact the Regional Manager for the service. The company will then actively respond to the enquiry.

11. Supporting Documents

- Grievance Policy
- Disciplinary Policy
- Recruitment Policy
- Menopause Policy