



Inclusion and Respect at Work Policy

Purpose:	<p>The purpose of this document is to provide a comprehensive understanding of the Company's policy regarding inclusion and respect at work.</p> <p>The Company is committed to providing equity of opportunity for all colleagues. Furthermore, we aim to ensure our workplaces are free from discrimination, victimisation and harassment and all stakeholders are treated fairly and with dignity and respect. We will ensure that equity of opportunity maintains a high profile in our organisation in our aim to become an employer of choice. We will continue to promote equal opportunity issues internally and will demonstrate these aims when dealing with customers and third parties.</p>
Scope:	<p>This policy applies to all colleagues of Headlam Group Plc in the UK and Ireland unless there is a locally agreed process in place in which case, provided the local agreement meets the minimum standards of good practice, the local agreement will take precedence.</p> <p>This policy applies irrespective of role or hours worked.</p>
Group or UK Only:	UK only
Issuing Department:	HR Department
Issue/Last Date:	September 2023
Date of Next Review (if applicable):	August 2024

Contents Page

	Page Number
Policy Statement	3
Overview of the Law	3
Responsibilities	4
Inclusion and Equal Opportunities	5
Equal Opportunities in Employment	5
Respect at Work	7
Procedure	8
Improper Conduct	10
Confidentiality	11
Legal Remedies	11
Counselling	11
Malicious Complaint	11

Policy Statement

The underlying principle of this policy is to ensure we create an environment in which all colleagues can fulfil their potential without barriers and in which the team is made stronger by the diverse backgrounds, experiences and perspectives of individuals.

Inclusion embodies all the differences that make us unique individuals. Not limited to physical aspects of race, ethnicity, gender, age, disability and sexual orientation, it includes culture, religion, education, experience, opinion, beliefs, language, nationality and more. The Company respects and values the unique perspectives and opportunities that a diverse workforce provides and aims to provide a work environment where inclusion is embraced, where people are promoted on their merits and where people treat each other with respect and dignity.

It is also critical to maintain a competitive advantage in today's marketplace. We must continue to diversify our workforce and equip our people with the necessary skills to work effectively in this increasingly diverse environment.

Headlam operates a zero-tolerance approach to discrimination, harassment and bullying. In addition to our colleagues, the same principles of zero tolerance will apply to workers and contractors engaged by us.

This policy is aligned to the International Labour Organisations' (ILO) indicator and sets out our commitment to prohibit workplace discrimination and ensure equal opportunities for all.

Overview of the Law

The Equality Act is a law which protects us from discrimination. It means that discrimination or unfair treatment on the basis of certain personal characteristics, such as age, is now against the law in almost all cases.

All colleagues are required to behave at all times in a manner which complies with this policy and fulfils the requirements of equality legislation. Ignorance of the law is no defence. This policy sets out the essential requirements of the equality legislation in the UK and Ireland. Colleagues will have no excuse if they act in a way which is contrary to this policy.

In line with the above legislation, it is unlawful to discriminate on the following grounds ("protected characteristics"):

Age, disability, gender reassignment, marital or civil partner status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

Discrimination can occur not just where a colleague is covered by one of the above protected characteristics but also when they are incorrectly perceived to have a characteristic (e.g. where a colleague is harassed as a result of a perception that they are homosexual when they are in fact heterosexual) or where they are associated with

someone who is covered by a protected characteristic, for example where someone is discriminated against on the grounds that they care for a disabled person.

Harassment is a criminal offence and Headlam have a zero- tolerance to bullying and harassment.

This policy does not set out the law on equality in detail. However, if you would like to learn more, see here – <https://www.gov.uk/guidance/equality-act-2010-guidance>

Responsibilities

Colleagues

Colleagues need to be aware of their own conduct and behaviour and ensure this is appropriate when dealing with any work colleagues, agency/sub-contractor colleagues, customers and third parties.

Colleagues should:

- Report any incidents of harassment, unacceptable or non-inclusive behaviour in the workplace. The way someone is conducting themselves may be harassment whether or not the person behaving in that way intends to offend. Everyone has a right to decide what behaviour is acceptable to them and should have their feelings respected by others.
- Raise any concern about malpractice or issues affecting the interests of the Company by referring to the Company's Speak Up Policy, which can be found on My Hub.

The following are examples of behaviour and conducts which violate Headlam's principles of dignity at work and/or may amount to bullying, harassment, discrimination, or victimisation:

- making insulting comments
- shouting at people;
- making threats or physical intimidation;
- unconsented touching or sexual advances;
- 'outing' or threatening to out an employee that is lesbian, gay, bi or trans ("LGBT"), or is believed to identify as LGBT;
- saying hurtful things to a person because of their gender identity;
- making derogatory remarks or jokes aimed at a particular person, offensive comments relating to a person's age, gender, gender reassignment, race, disability, religion or belief, pregnancy/maternity, marital status, or sexuality;
- sending an offensive email or text or series of the same;
- trolling;
- humiliating, ignoring, or gossiping about an employee in any capacity;
- making innuendos;
- intrusively questioning an individual regarding their personal circumstances;
- "banter" which makes a person feel unwanted and/or unwelcome;

- displaying or circulating of material which could be offensive whether in the form of literature, photographs, or online content
- deciding not to promote any employee because they rejected your sexual advances;
- spreading malicious rumours;
- overbearing supervision or an abuse or other misuse of power or position;
- deliberately undermining an employee by overloading and/or constantly criticising them;
- repeated unfair criticism that focuses on blame rather than future improvement
- preventing individuals' career progression by blocking promotion or training opportunities;
- deliberately imposing grossly excessive workloads/unachievable deadlines to make life difficult for an employer refusing to give an employee time off to support an employee who has made a complaint;
- any form of transphobia including deliberate and continuous use of the wrong pronoun or name to address an individual, for example, based on gender expression or gender identity.

Line Manager

Line Managers have a responsibility to manage their direct reports with empathy, compassion, fairness and transparency. Any allegations of non-inclusive behaviour should be investigated and ensure colleagues are made to feel psychologically safe to share experiences and prioritise their wellbeing.

Line Managers should:

- Promote the policy and procedures and ensure it is adhered to.
- Set appropriate standards of behaviour, lead by example & ensure that those they manage adhere to this policy.
- Ensure colleagues are aware of what is acceptable and unacceptable behaviour.
- Take appropriate action to deal with unacceptable behaviour in a professional, timely fashion and in accordance with the procedure.
- Ensure that colleagues involved in a complaint are fully supported before, during and after the investigation.
- Keep all details of complaints confidential within the parameters of the procedure.
- Attend any appropriate training offered by the Company.

All colleagues are expected to be mindful of their own behaviour to help Headlam in fostering a truly inclusive environment in which everybody can thrive and be themselves

Inclusion and Equal Opportunities

The Company values the unique perspectives and opportunities that a diverse workforce brings. We believe a diverse workforce is critical to maintaining a competitive advantage in today's marketplace. We all have individual differences from which we can share and learn. Offering a workplace where inclusion is valued helps us build best workforce we can which is so crucial to our success.

The Company will strive to ensure that equality of opportunity is maintained in the following areas:

- Recruitment and Selection
- Promotion, Training and Development
- Terms of Employment, Benefits, Facilities and Services
- Grievances and Disciplinary Procedures
- Redundancies

Recruitment and Selection

The following principles will apply at all stages of the recruitment and selection process:

- Individuals will be assessed according to their capability to carry out the role, taking into account any requirement for the Company to make reasonable adjustments.
- Any age specific criteria will be applied strictly in accordance with age discrimination legislation.
- All selection and recruitment will be carried out in a non-discriminatory way.
- Recruitment and selection will be undertaken in a fair and transparent manner.
- All applications will be processed in a fair and objective manner.
- Records of interviews and reasons for appointment and non-appointment will be retained.
- Reasonable adjustments will be made (where required) to ensure candidates do not suffer any disadvantage in the recruitment and selection process.

Promotion, Training and Development

The following principles will apply to promotion, training and development:

- Assessment criteria, performance review and performance development processes will be applied and operated in a non-discriminatory way.
- Reasonable adjustments will be made (where required) to ensure all colleagues receive appropriate training.

Terms of Employment, Benefits, Facilities and Services

The following principles shall apply to terms of employment, benefits, facilities and services:

- Terms of employment, benefits, facilities and services available to colleagues will be free from discrimination and will comply with any prevailing discrimination legislation.
- Part-time and fixed term colleagues will be treated strictly in accordance with any prevailing equality legislation.

Grievances and Disciplinary Procedures

The Company will operate and conduct its disciplinary and grievance procedures in a non-discriminatory and fair manner and in accordance with the principles of natural justice. The Company will make all reasonable adjustments, where necessary, to ensure that a fair procedure is followed in every case. This policy can be found on My Hub.

Redundancies

The Company will conduct any redundancy procedure in a non-discriminatory way and in accordance with the Company's Redundancy Policy (which can be found on My Hub) or procedure in force at the relevant time.

Respect at work

Harassment

Broadly speaking harassment is unwanted conduct which affects the dignity of people in the workplace. It may be related to a person's age, sex, disability, religion, nationality or any protected characteristic, and may be a persistent or isolated incident. The conduct may violate the person's dignity or create an intimidating, hostile, degrading, humiliating or offensive environment. The perpetrator does not need to have intent for behaviour to constitute harassment.

The Company will take any allegation of harassment, bullying or improper conduct seriously and will deal with matters in an appropriate way and according to the circumstances of each case.

The following are examples of conduct which contravene this Policy. This is not an exhaustive list:

- Physical Conduct - Unwanted physical conduct including deliberate touching, patting, pinching, stroking and coercion for sexual favours.
- Verbal Conduct - Unwelcome advances, propositions or pressure for sexual activity, flirtations, innuendo, lewd comments or abusive language which insults or ridicules a person, insults which are discriminatory in nature (e.g. racist or sexist comments or comments made to an older worker alluding to their age), mimicking accents, speech or mannerisms, offensive comments about dress or religious dress or customs e.g. a Sikh turban, appearance or physique or speculation about a person's private life and/ or sexual activities.

- Non-Verbal Conduct - The display of pornographic or sexually suggestive pictures, including pin-ups, offensive or sexual objects or written materials; the making of abusive or offensive gestures, including leering and whistling; the display or creation or transmission of offensive written or verbal material (e.g. of a sexual or racial nature) or non-verbal conduct which denigrates a person for any other reason.

Bullying

Broadly speaking bullying is the persistent demeaning and humiliation of others through words, actions or physical conduct which erodes their self-confidence and/or undermines their self-esteem. Bullying might include:

- Banter which creates an offensive or humiliating work environment is never acceptable.
- Unwarranted criticism of a person's job performance.
- Unjustified reassignment of a person to a different set of responsibilities.
- Failing to extend opportunities that have been made available to others.
- Refusing to work with a person.
- Excluding a person from normal work and social activities.
- Encouraging others to exclude, ignore, ridicule or otherwise demean or humiliate a person.

Bullying does not include:

- Job performance assessment and counselling (unless without due reason).
- Reasonable work-related instructions and advice.
- Discipline for cause.
- Responding in good faith to a complaint made under this policy.

Victimisation

Victimisation is penalising a person for:

- Bringing proceedings under equality legislation.
- Alleging that someone has contravened such legislation.
- Giving evidence or information in connection with any such proceedings; provided the person complaining acts in good faith in bringing their complaint.

Procedure

The Company provides an informal as well as a formal complaint procedure for colleagues, which can be found within the problem solving policy on My hub. In certain circumstances colleagues may bring their own legal proceedings against the perpetrator. Colleagues are however encouraged to exhaust the Company's own procedures in the first instance, which will not affect their right to pursue other action

later. See below for information on the legal liabilities associated with discrimination, bullying and harassment.

Any individual who believes that they have been subjected to any form of discrimination, bullying or harassment is encouraged to bring the matter to the attention of their Line Manager or the HR department. The complaint should be made as soon as the matter arises so that the Company may take appropriate action; this may include an investigation which can only commence once a complaint is made. These procedures are explained below.

Complaints Procedure

Any complaint of bullying, harassment, discrimination or other improper conduct will be dealt with without unreasonable delay and will be handled by the Company in a discreet and appropriate manner and in accordance with the Company's Grievance Procedure, where appropriate.

If any complaint is made in bad faith e.g. to disrupt the business, injure the reputation of the Company, colleague or third party, or for any other reason, the Company may take disciplinary or other action.

If an individual believes they are being or have been subjected to improper conduct they are encouraged to take the following steps:

Informal Procedure

If an individual believes they are being subjected to improper conduct, they should inform that person (verbally or in writing) that they do not welcome the conduct and ask them to stop immediately.

If the individual is unable for any reason to speak to the person, or having spoken to the person the conduct continues, the individual should discuss their concerns with their Line Manager or an HR department.

Depending on the nature of the complaint, the Company reserves the right to investigate the matter and, if appropriate, invoke disciplinary action. The Line Manager or HR department dealing with the matter will keep both parties informed of how the matter is progressing and will keep a record of the complaint and any action or outcome.

This procedure will be completed within a reasonable timeframe and ideally within 14 days of the individuals' first contact with their Line Manager or HR department, unless a longer period is warranted in the circumstances, in which case the Line Manager or HR department will apprise the individual of the proposed time frame.

Formal Procedure

At any time an individual may make a complaint in writing to their Line Manager or HR department. Any formal complaint from a colleague will be dealt with in accordance with the Company's Problem Solving Policy.

Sanctions

Sanctions for incidents of discrimination, bullying or harassment or other improper conduct may include one or more of the following (this list is not exhaustive):

- Disciplinary action in accordance with the Company's Disciplinary Procedure.
- Termination of the offending worker's or contractor's contract.
- Appropriate training, e.g. management training.
- Removal or re-assignment of work or location of the perpetrator in appropriate circumstances.

The Company will monitor the situation following any complaint of improper conduct to ensure there is no repeat of the conduct and may provide education and training, where appropriate, where a particular problem or pattern of conduct is identified.

Improper Conduct

By clients, customers, contractors, visitors or other third parties:

If any colleague is subjected to improper conduct by a client, customer, contractor, supplier, visitor or other third party, they should raise this immediately with their Line Manager or HR department.

The Company will investigate any complaint through the appropriate channels and, where possible, take appropriate steps to prevent a recurrence of the improper conduct. Where possible, and especially if requested by the individual, the Company will try to minimise the possibility of them coming into further contact with the third party.

The Company will take appropriate action against any of its colleagues found responsible for improper conduct outside normal working hours where in the reasonable opinion of the Company:

- The Company is likely to be or has been brought into disrepute; and/or such conduct creates a hostile or intimidating environment during working hours; and/or such conduct has an adverse effect on an individual's or third party's ability to perform their job or function properly.

Reporting improper conduct on behalf of others:

The Company believes that all colleagues should take responsibility for ensuring that fellow colleagues and third parties are not subjected to improper conduct. If you witness improper conduct, or reasonably believe that a fellow colleague, worker, contractor or third party is the subject of improper conduct by another colleague, worker, contractor or third party you should provide support and encourage them to report the behaviour.

Confidentiality

It is essential that an individual who has complained, and all who are involved in the investigation of a complaint and any resulting procedure, maintain confidentiality in respect of that investigation or procedure, except where disclosure is necessary and appropriate in the circumstances. Any unauthorised breach of confidentiality will be treated seriously. If a colleague wants to remain anonymous, they can do this via our speak up process by calling 0800 046 5406

Legal Remedies

The Company may be liable for the acts of its colleagues in certain cases; this is called “vicarious liability”. In addition to raising a complaint or grievance, any individual who complains of harassment during their employment may bring their own legal proceedings. There are civil and criminal penalties available under the Protection from Harassment Act 1997 (UK) and the Non-Fatal Offences Against the Person Act 1997 (ROI). All colleagues should be aware that they may be held personally liable under the law for their acts of discrimination, harassment or bullying.

Discrimination legislation generally provides that a serious one-off incident may be sufficient to establish a claim of harassment under the relevant discrimination legislation.

Counselling

Any individual who feels they would benefit from counselling in relation to an allegation of inappropriate conduct should contact their Line Manager or HR department, who will arrange for them to speak to an independent counsellor. Alternatively, any colleague can contact our Employee Assistance Provider, Telus Health on 0800 169 1920.

Malicious Complaints

It is fully expected that colleagues will act responsibly regarding this issue. False accusations can have serious effect on innocent individuals and will not be tolerated by the Company. Therefore, should an investigation show that a false accusation has been made in bad faith, appropriate disciplinary action, which could include dismissal, will follow.

End of Policy