

## DIVERSITY, INCLUSION AND BELONGING POLICY

---

### Introduction

Our organisation is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills, or motivations. And we value our people for the differences they bring to the table. These differences - this diversity - is powerful.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences, and skills. We believe that this creates a happier, more productive working environment for us all.

To support this inclusive culture, this policy:

- outlines our commitment throughout the employment lifecycle to diversity, inclusion and belonging and sets out how we put this commitment into practice
- explains the behaviours we expect of our people in support of this commitment; and
- sets out the key steps we take to make our culture as inclusive as possible, including our diversity and inclusion framework and how we ensure equality of opportunity throughout the employment lifecycle.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

### Scope

This policy applies to anyone working for us or alongside us. This includes employees and consultants. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

The policy accompanies our anti-harassment and bullying policy, transgender and non-binary equality policy, neurodiversity policy, psychological safety policy, equal opportunities policy, family friendly policies, menopause and menstruation policies, and disability and chronic illness policy. All of which can be found on our People hub.

### Our commitment to you

We believe that a culture of diversity, inclusion and belonging not only benefits our organisation but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

We are committed to promoting a working environment based on dignity, trust, and respect, and one that is free from discrimination, harassment, bullying or victimisation.

We ensure that our recruitment, promotion, and retention procedures do not treat people less favourably because of their:

- disability;
- gender, gender identity or gender reassignment status;
- marital status;
- race, racial group, ethnic or national origin, or nationality;
- religion or belief;
- sexual orientation;
- age;
- civil partnership status;
- pregnancy or maternity;
- paternity;
- educational background;
- socio-economic background;
- caring responsibilities;
- part-time status; or

- fixed-term status.

## **What we expect from you**

We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting, and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others. And the more areas of difference a person brings, the more this effect can be compounded. In this way, the experiences of a black woman with a disability may be very different to the experiences of a black woman without a disability and also very different from the experiences of a white woman. This way of looking at diversity and inclusion is known as "intersectionality".

We expect you to treat your colleagues and third parties (including clients, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues, or third parties must be free from any form of discrimination, harassment, victimisation or bullying.

If any of our people are found to have committed, authorised, or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our anti-harassment and anti-bullying policy and/or disciplinary policy.

You should be aware that you can be personally liable for discrimination and harassment.

## **Discrimination**

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;
- religion or belief;
- sexual orientation;
- age; and
- pregnancy or maternity.

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception.

There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments".

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals;
- recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients; and
- using different standards for different groups of employees to judge performance.

## Different types of discrimination under the Equality Act 2010

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
  - dismissing or failing to pay a bonus to someone because of their disability-related absence; or
  - disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.
- **Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:
  - allocating some of the disabled person's duties to a colleague;
  - changing their working hours or place of work;
  - adjusting procedures for assessing job candidates; and
  - modifying disciplinary and grievance procedures.

## Harassment and sexual harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

You should refer to our anti-harassment and anti-bullying policy for further information on our procedure for reporting harassment.

## Victimisation

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

## Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

You should refer to our anti-harassment and anti-bullying policy for further information on our procedure for reporting bullying.

## **Progressing Diversity Inclusion and Belonging at Bidwells**

Diversity, Inclusion and Belonging forms part of our broader ESG strategy. Further details of this can be found [here](#).

Bidwells are committed to making continued and sustained progress towards being an even more diverse and inclusive business.

We have made five key commitments in this area:

- Progressing gender equality
- Standing against race and religious discrimination
- Respecting all sexual orientations and identities
- Providing opportunities for disabled people
- Embracing our multi-generational population.

Full details of our 5 commitments can be found [here](#).

We are delivering on our five commitments through a substantive action plan which covers the following areas:

- Engagement and awareness
- Policies, processes and governance
- Development and retention
- Future talent and industry

Whilst we intend to make progress on each commitment every year, we will have an annual 'commitment focus' which we will pay specific attention to accelerating in that year.

We launched our Belong at Bidwells programme in March 2021. Our Belong at Bidwells mission is to create a truly inclusive culture of belonging, where everyone can thrive and succeed as their true and authentic selves at every level.

Through Belong at Bidwells we run Diversity, Inclusion and Belonging webinars, training, focus groups and more. The programme co-ordinates all our actions to become a diverse and inclusive employer.

We also have a Belong at Bidwells intranet hub which hosts all of our Belong at Bidwells information.

## **Monitoring and review**

We collect and analyse employee's diversity and inclusion data in compliance with our data protection obligations on an ongoing basis to assess the impact of this policy and our diversity, inclusion and belonging strategy. We may also use diversity and inclusion data when completing client pitch forms, as requested. Data will always be anonymised and will not be used if an employee could be identified from the data.