Equality, Diversity and Inclusion Policy

Applies to	All employees, workers, apprentices, contractors, interns, volunteers and job applicants
Policy owner	HR Manager
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We use the language of equity alongside equality throughout this policy. While equality means giving everyone the same, equity recognises that fair treatment sometimes means giving people what they individually need to reach the same starting point. Our legal obligations sit under the Equality Act 2010, and all references to equality in this policy should be understood in that spirit.

We are committed to equality, diversity and inclusion across everything we do. This policy sets out what that means in practice - for the business, for managers, and for everyone who works with us.

This policy covers all aspects of how people are treated by us, including recruitment, pay and conditions, training and development, promotion, appraisals, grievances, disciplinary matters, ending employment, and how we treat visitors, clients, suppliers and other business contacts.

Equality, diversity and inclusion are not just legal obligations - they reflect the kind of workplace we want to be. We ask everyone to read this policy, understand it, and act in accordance with it.

This policy does not form part of your contract of employment. We reserve the right to amend it. Please read it alongside our Harassment and Bullying Policy, our Sexual Harassment Policy and our Grievance Policy.

1. What do we mean by equality, diversity and inclusion?

These three ideas are connected but distinct, and it is worth understanding each one.

Equality

Equality means treating everyone fairly and giving everyone equal opportunities and rights. It does not mean treating everyone identically - it means making sure that differences in background or identity do not lead to unfair treatment or disadvantage.

Diversity

Diversity recognises that the world is full of differences - in background, identity, experience and perspective. We value those differences and see them as a strength. Recognising diversity means being aware of those differences and responding to them positively, not ignoring them.

Inclusion

Inclusion means creating a workplace where everyone feels valued, respected and able to contribute fully - regardless of their background or identity. Diversity without inclusion is not enough. We want every person who works with us to feel genuinely included.

2. The nine protected characteristics

The law - primarily the Equality Act 2010 - focuses its protection on nine characteristics. Discrimination in connection with any of these is unlawful. They are:

- **Age**
- **Disability** - a physical or mental impairment that has a long-term and substantial adverse effect on a person's ability to carry out normal day-to-day activities
- **Gender reassignment** - this covers any person who is proposing to undergo, is undergoing, or has undergone a process for the purpose of reassigning their sex by changing physiological or other attributes of sex
- **Marriage and civil partnership**
- **Pregnancy and maternity**
- **Race** - incorporating colour, ethnic origin, national origin and nationality
- **Religion or belief**
- **Sex**
- **Sexual orientation**

You do not have to personally have a protected characteristic to be protected by the law. The law also protects you from being treated less favourably because of a protected characteristic you are thought to have (known as discrimination by perception), or because of the characteristic of someone you are associated with (discrimination by association).

The protected characteristics of sex and gender reassignment are distinct. Following the 2025 Supreme Court ruling, 'sex' in the Equality Act 2010 means biological sex, and a Gender Recognition Certificate does not change a person's sex for the purposes of the Act. This interpretation does not remove protection from trans people: they remain fully protected from discrimination, harassment and victimisation on the ground of gender reassignment, and can rely on the Act's other protections too. We are committed to treating all colleagues with dignity and respect, and to applying this area of law thoughtfully as the EHRC's updated Code of Practice is finalised.

3. Types of discrimination

Discrimination can take several forms. Sometimes it is intentional; sometimes it is entirely unintentional. Both can be unlawful. We do not tolerate any form of discrimination.

Direct discrimination

This is when someone is treated less favourably because of a protected characteristic than someone else has been, or would have been, in the same circumstances. For example, rejecting a job applicant because of their race, or failing to promote someone because they are pregnant.

Indirect discrimination

This is when a provision, criterion or practice applies to everyone but puts people with a particular protected characteristic at a disadvantage, and there is no good business reason to justify it. For example, requiring all employees to work Saturdays without good reason could indirectly discriminate against Jewish employees who observe the Sabbath.

Harassment

Harassment occurs when someone is subjected to unwanted behaviour related to a protected characteristic, or of a sexual nature, that violates their dignity or creates an environment that is hostile, humiliating, degrading or intimidating. Sexual harassment also occurs where a person is treated less favourably because they have rejected or submitted to unwanted conduct of a sexual nature.

Examples include name-calling, offensive jokes, excluding colleagues, and displaying inappropriate material. We cover this in more detail in our Harassment and Bullying Policy and Sexual Harassment Policy.

Victimisation

In a legal context, victimisation has a specific meaning. It occurs when someone who has made a complaint about harassment or discrimination - or who has supported a colleague in their complaint - is then treated less favourably as a result. For example, an employee who is ostracised or dismissed because they supported a colleague in a harassment investigation.

There are also specific protections relating to disability that go beyond these categories:

- Failure to make reasonable adjustments - where an adjustment would remove or reduce a disadvantage experienced by a disabled person, we are required to make it if it is reasonable to do so

- Discrimination arising from disability - treating someone less favourably because of something connected to their disability, rather than the disability itself, without justification

4. Part-time and fixed-term workers

We treat part-time and fixed-term employees in the same way as comparable full-time or permanent employees. Any difference in treatment must be objectively justified.

5. Our responsibilities and yours

Everyone in our business has a legal responsibility to comply with this policy - regardless of seniority. Any of us may be personally liable for unlawful discrimination if we breach its terms, and the business itself may also be liable.

Managers

Everyone in a management role is expected to lead by example, act in full accordance with this policy, and maintain appropriate standards of behaviour within their teams. If you manage people, equality, diversity and inclusion are part of your responsibilities - not an optional extra.

All employees

We ask everyone to take personal responsibility for following this policy, treating colleagues and others with respect, and drawing any actual or potential breaches to our attention. If you are unsure what is or is not acceptable, speak to your line manager.

We also encourage everyone to actively help promote equality, diversity and inclusion across the business. If you have ideas about how we could do better in this area, please share them with your manager.

6. Recruitment, training and development

We carry out all recruitment, promotion and other selection processes - including redundancy selection - on the basis of merit, using criteria and processes that avoid discrimination.

Job adverts must not include wording that could discourage applications from any group, or that stereotypes in any way. Vacancies should be advertised as widely as possible.

We will not ask job applicants about their health, attendance record or disability before making a job offer, except in the limited circumstances permitted by law - for example, to check whether reasonable adjustments are needed for the interview, or to confirm the applicant is capable of carrying out an essential function of the role.

Training and development opportunities will be made available to all, without being influenced by any protected characteristic. Promotion decisions will be made on the basis of merit.

7. If something goes wrong

We take all complaints and concerns seriously and will investigate any allegation of discrimination or harassment promptly and fairly.

If you believe you have been discriminated against or harassed, speak to your line manager as soon as possible. If the matter involves your line manager, or you prefer not to approach them, speak to the HR Manager or a Senior Director. If you wish to take formal action, follow our Grievance Policy.

We will not tolerate victimisation or retaliation against anyone who raises a concern or supports a colleague in doing so. If you are concerned you have been victimised for speaking up, raise this with the HR Manager or a Senior Director or follow the Grievance Policy.

If we find that someone has harassed or discriminated against another person in breach of this policy, they will face disciplinary action. In serious cases this may amount to gross misconduct and result in dismissal without notice.

We also take a firm approach to complaints made in bad faith - that is, complaints that the person knows to be untrue, made to deflect or avoid other action. We treat these as misconduct, and in serious cases they may result in dismissal.

8. Monitoring

We may collect and analyse anonymised equal opportunities data to help us understand whether this policy is working effectively, review the composition of our workforce, and identify any areas for improvement. Any data collected will be handled in line with our Data Protection Policy and Privacy Notice.

The HR Manager will monitor the outcomes of complaints raised under this policy to identify any patterns and to inform training and awareness needs.

9. Questions and administration

The HR Manager is responsible for the administration of this policy. If you have any questions or feedback, please contact suebailey@ansteyhorne.co.uk.

Related policies: Harassment and Bullying Policy – Sexual Harassment Policy - Grievance Policy - Recruitment Policy - Data Protection Policy

This policy does not form part of any contract of employment.