

Equal Opportunities Policy

Statement of policy and purpose of policy

Kindred CSR Ltd. (the **Employer**) is committed to equal opportunities for all stakeholders involved in its business.

It is our policy that all employment, client or supplier decisions are based on merit and the legitimate business needs of the organisation. We do not discriminate on the basis of race, colour or nationality, ethnic or national origins, sex, gender reassignment, sexual orientation, marital or civil partner status, pregnancy or maternity, disability, religion or belief, age or any other ground on which it is or becomes unlawful to discriminate under the laws of England, Wales and Scotland (referred to as **Protected Characteristics**).

Our intention is to enable all of our stakeholders to work in an environment which allows them to fulfill their potential without fear of discrimination, harassment or victimisation. Our commitment to equal opportunities extends to all aspects of the working relationship including:

- recruitment and selection procedures;
- terms of employment, including pay and conditions;
- training, appraisals, career development and promotion;
- work practices, conduct issues, allocation of tasks, discipline and grievances;
- work-related social events; and
- termination of employment and matters after termination, including references.

This policy is intended to help us achieve our diversity and anti-discrimination aims by clarifying the responsibilities and duties of everyone in respect of equal opportunities and discrimination. We will promote effective communication and consultation between us and our stakeholders concerning equal opportunities by means it considers appropriate.

The principles of non-discrimination and equal opportunities also apply to the way in which employees treat visitors, clients, customers, suppliers and former staff members.

Who is responsible for equal opportunities?

Achieving an equal opportunities workplace is a collective task shared between all stakeholders, irrespective of seniority, tenure and working hours.

The board of directors of Kindred CSR have overall responsibility for this policy and for equal opportunities and discrimination law compliance in the workplace, as well as the day-to-day operational responsibility for these matters.

All stakeholders have personal responsibility to treat colleagues with dignity at all times and not to discriminate against or harass others.

In addition, stakeholders who take part in management, recruitment, selection, promotion, training and other aspects of career development (referred to as **Managers**) have special responsibility for leading by example and ensuring compliance.

Managers must take all necessary steps to:

- promote the objective of equal opportunities and the values set out in this policy;
- ensure that their own behaviour and that of others they manage complies in full with this policy;
- ensure that any complaints of discrimination, victimisation or harassment (including against themselves) are dealt with appropriately and are not suppressed or disregarded.

What is discrimination?

Discrimination occurs in different ways, some more obvious than others. Discrimination on the grounds of any of the Protected Characteristics is prohibited by law, even if unintentional, unless a particular exception applies.

Direct discrimination

Direct Discrimination is less favourable treatment because of one of the Protected Characteristics. Examples would include refusing a woman a job as a chauffeur because you believe that women are not good drivers or restricting recruitment to persons under 40 because you want to have a young and dynamic workforce.

Direct discrimination can arise in some cases even though the person complaining does not actually possess the Protected Characteristic but is perceived to have it or associates with other people who do. For example, when a person is less favourably treated because they are (wrongly) believed to be homosexual or because they have a spouse who is Muslim.

Indirect discrimination

Indirect discrimination arises when an employer applies an apparently neutral provision, criterion or practice which in fact puts individuals with a particular Protected Characteristic at a disadvantage, statistically and this is unjustified. To show discrimination the individual complaining also has to be personally disadvantaged. An example would be a requirement for job candidates to have ten years' experience in a particular role, since this will be harder for young people to satisfy. This kind of discrimination is unlawful unless it is a proportionate means of achieving a legitimate aim.

Victimisation

Victimisation means treating a person less favourably because they have made a complaint of discrimination or have provided information in connection with a complaint or because they might do one of these things.

Harassment

Harassment is defined as unwanted conduct related to a relevant Protected Characteristic (within the Equality Act 2010) which has the effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Please refer to our Anti-Harassment and Bullying Policy for further information.

Disability discrimination

This could be direct or indirect discrimination, and is any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Disabled persons

Any stakeholder who considers that they may have a disability is strongly encouraged to speak with the Director, particularly if they experience difficulties at work because of their disability so that any reasonable adjustments to help overcome or minimise difficulties can be discussed.

For these purposes, disability includes any physical or mental impairment which substantially affects your ability to perform day to day activities and has lasted (or is likely to last) more than 12 months.

Disclosure of this information will be treated in confidence, if you wish it to be, so far as is reasonably practicable and we will do our best to handle matters sensitively and to ensure that you are treated with dignity and with respect for your privacy.

We will consult with you about whether adjustments are needed to avoid you being disadvantaged and we will seek to accommodate your needs within reason. If we consider a particular adjustment unreasonable we will explain why and try to find an alternative solution.

Making employment decisions fairly

As noted above, we will recruit employees and make other employment decisions concerning promotion, training, dismissal and related issues on the basis of objective criteria.

We will only stipulate criteria or conditions for employment decisions (including job selection, promotion and redundancy) which are based on a legitimate business need and which do not go further than is needed to satisfy that need. If you are in any doubt about whether particular criteria or conditions are indirectly discriminatory or justifiable, then please speak to one of our Directors.

Recruitment

When recruiting employees, we will:

- specify only recruitment criteria that are relevant to the job, reflect genuine business needs and are proportionate. More than one person should be involved in shortlisting of applicants wherever practicable;
- ensure that vacancies are advertised to a diverse audience and try to avoid informal recruitment methods that exclude fair competition. In very rare cases, it may be legitimate and necessary to restrict recruitment to a particular role to certain groups, but it is essential that this is discussed with the Director so that appropriate steps can be taken to ensure legality;
- review job advertisements carefully to ensure that stereotyping is avoided and that particular groups are not unjustifiably discouraged from applying;
- not ask applicants about health or disability before a job offer is made (other than in exceptional circumstances and after having been approved by the Director). If necessary a job offer can be expressed to be conditional upon satisfactorily passing a medical check.
- not ask candidates about any Protected Characteristic if the question may demonstrate an intention to discriminate. For example, candidates should not be asked about current or future pregnancy, childcare or related matters; and
- not make assumptions about immigration status based on appearance, accent or apparent nationality;
- so far as reasonably practicable, keep a written record of their reasons for relevant decisions.

Kindred CSR is legally required to verify that all employees have the right to work in the UK. Prior to starting employment, all employees must produce original documents to our satisfaction, irrespective of nationality. Information about the documents required is available from our Director(s).

Staff training, career development and promotion

Training needs may be identified during the normal appraisal process. Appropriate training to facilitate progression will be accessible to all staff.

All promotion decisions will be made on the basis of merit and according to proportionate criteria determined by legitimate business need.

Conditions of service

Access to benefits and facilities and terms of employment will be kept under review to ensure that they are appropriately structured and that no unlawful barriers to qualification or access exist.

Discipline and termination of employment

Any redundancy selection criteria and procedures that are used, or other decisions taken to terminate employment, will be fair and not directly or indirectly discriminatory.

Disciplinary procedures and penalties will be applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Discipline and termination of employment

Part-time and fixed-term staff will be treated the same as full-time or permanent staff of the same position and enjoy no less favourable terms and conditions (pro-rata, where appropriate), unless different treatment is justified.

What to do if you encounter discrimination

If you believe that you have been the victim of discrimination, you should follow Kindred CSR's Grievance Procedure.

Every stakeholder has a responsibility to combat discrimination if they encounter it. Those who observe or are aware of acts that they believe amount to discrimination directed at others are encouraged to report these to the Directors.

Any grievance or report raised about discrimination will be kept confidential so far as this is practicable. We may ask you if you wish your complaint(s) to be put to the alleged discriminator if disciplinary action appears to be appropriate. It sometimes may be necessary to disclose the complaint or take action even if this is not in line with your wishes, but we will seek to protect you from victimisation and, if you wish, we will seek to protect your identity. You should be aware that disciplinary action may be impossible without your co-operation or if you refuse to allow relevant information to be disclosed.

Staff who raise a complaint about or report discrimination in good faith will be protected from retaliation or victimisation. As long as you act in good faith, the fact that you have raised a complaint or report will not affect your position within the Employer, even if the complaint is not upheld. Making a false allegation deliberately and in bad faith is a misconduct offence and will be dealt with in accordance with our disciplinary policy. Any member of Staff who attempts acts of retaliation or

victimisation may be subject to disciplinary action up to and including summary dismissal for gross misconduct.

If you make a complaint, it may be necessary to ask you to stay at home on paid leave while investigations are being conducted and the matter is being dealt with through the appropriate procedure. This may particularly be necessary in cases of alleged harassment.

Non-compliance with equal opportunities rules

Any breach of equal opportunities rules or failure to comply with this policy will be taken very seriously and is likely to result in disciplinary action against the offender, up to and including immediate dismissal or termination of contracts.

Staff should also note that:

- in some cases, they may be personally liable for their acts of discrimination and that legal action may be taken against them directly by the victim of any discrimination; and
- it may be a criminal offence intentionally to harass another employee.

Review of this policy

The board of directors of the Employer will keep this policy under review.

The Employer encourages stakeholders to comment on this policy and suggest ways in which it might be improved or ask any questions if they are unsure about any part of this policy or how it is applied by contacting alison@kindredcsr.com

Signed: *A Phillips*

Date: 21/06/2023

Name: Alison Phillips

Position: Director