

Equality, Diversity and Inclusion Policy

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1. Aims and Objectives

The RTC Group believes equality, diversity and inclusion involves creating an environment supported by practices which benefit not only the company but everyone who works in it and with it. We believe that people, whilst similar in many ways, differ from one another in various ways. Understanding, valuing and effectively managing these differences can result in greater participation that can lead to benefits and success at an individual, team, company, group and wider societal level.

We aim to provide a supportive, inclusive workplace free from discrimination, where everyone is treated equally regardless of their differences. We do this by valuing difference and developing a business culture that reflects our beliefs. We embrace diversity, equality and inclusion and seek to promote their benefits in our business activities. Our recruitment companies also strive to help their clients meet their own diversity targets.

We promote diversity for all employees, workers and applicants. We will continuously review all aspects of our recruitment to avoid unlawful discrimination and make decisions based on merit. We will also expand the media in which we recruit to ensure that we have a diverse employee and candidate base and avoid stipulating unnecessary requirements which will exclude a higher proportion of a particular group of people. We will not prescribe discriminatory requirements for our roles.

Our recruitment companies will not discriminate unlawfully when deciding which candidate/worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for workers. We will ensure that each candidate is assessed in accordance with the candidate's merits, qualifications and ability to perform the relevant duties for the role.

Furthermore, we will monitor the composition of our internal workforce to ensure that this policy is effective.

2. Status of this Policy

This policy does not give contractual rights to individuals. We reserve the right to alter any of its terms at any time and an updated version will be uploaded onto the Group Intranet.

3. Responsibility for this Policy

This policy has been agreed with senior management and has the full support of our board of directors. The Group HR Department are responsible for reviewing and updating this policy.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives for equality, diversity and inclusion.

Employees are invited to comment on this policy and suggest ways in which it might be improved by contacting the Group HR Department.

4. Discrimination

Discrimination is unlawful when it takes place on one of the following grounds (the 'protected characteristics' as specified in the Equality Act 2010 (the Act)):

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

The following forms of discrimination are prohibited under this policy and are unlawful:

4.1. Direct Discrimination

Direct discrimination is when someone is treated less favourably because of a protected characteristic. Treating someone less favourably means treating them worse in comparison to others that do not have that protected characteristic. *For*

example, it would be direct discrimination if a manager excludes an employee from a training course just because she is gay.

Direct discrimination can also take place if someone is treated less favourably because it is assumed that they have a protected characteristic (discrimination by perception) or is associated with someone that has a protected characteristic (discrimination by association). *For example, it would be direct discrimination if an employee ostracised a colleague.*

because the colleague has a gay flatmate (discrimination by association) or because he thinks the colleague is gay (discrimination by perception).

Our recruitment companies will not discriminate against a person on the grounds of a protected characteristic:

- in the terms on which they offer to provide any services;
- by refusing or deliberately omitting to provide any services;
- in the way they provide any services.

Direct discrimination would also occur if one of our recruitment companies businesses accepted and acted upon instructions from an employer/end client which states that certain persons are unacceptable due to a protected characteristic, unless there is an objective justification. Recruitment staff should refer to Group HR for advice on objective justifications **before** actioning such an instruction.

4.2. Indirect Discrimination

Indirect discrimination occurs when an apparently neutral practice or requirement (provision, criterion or practice (PCP)) is applied but this results in people who have a protected characteristic being placed at a disadvantage in comparison to those who do not have the protected characteristic. *For example, imposing a requirement that job applicants must speak fluent English disproportionately disadvantages non-English groups and would be unlawful unless it could be objectively justified on genuine business grounds.*

If the PCP can be objectively justified it will not amount to discrimination. Recruitment staff should refer to Group HR for advice on objective justification received from an employer/end client **before** taking any action.

Indirect discrimination would also occur if we accepted and acted upon an indirectly discriminatory instruction from an employer/end client.

Our recruitment companies will use best endeavours to comply with the Act and will not accept instructions from clients that will result in unlawful discrimination.

4.3. Harassment

Harassment is when someone receives unwanted behaviour relating to their protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the individual, including sexual harassment.

4.4. Victimization

We are committed to providing a work environment free from unlawful harassment and we aim to ensure that our employees do not harass any individual.

Victimization occurs when an individual is treated less favourably because he/she has complained about discrimination, brought a claim for discrimination, raised a grievance about discrimination or given evidence in respect of a complaint about discrimination.

5. Disabled Persons

5.1. Discrimination Arising from Disability

Discrimination occurs when a person is treated less favourably as a result of something connected with their disability.

Indirect discrimination occurs where a provision, criterion or practice (PCP) is applied by, or on behalf of an employer, or where any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled.

In recruitment and selection there may be a requirement to make reasonable adjustments. For example, it might be necessary to have different application procedures for partially sighted or blind applicants that enable them to use Braille. With testing and assessment methods and procedures, tests can only be justified if they are directly related to the skills and competencies required for the job. Even then, it might be appropriate to have different levels of acceptable test results, depending on the disability. For example, an applicant with a learning disability might need more time to complete a test, or not be expected to reach the same standard as other non-disabled applicants.

We will make our career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of our staff, candidates and clients when on our premises.

5.2. Medical Examination and Questionnaires

Certain roles working in safety critical environments require candidates to undertake medical examinations for health and safety reasons and duty of care, where this is a requirement it is for all employees and workers whether or not they are disabled.

5.3. Employees Who Become Disabled During Employment

If an individual becomes disabled whilst employed by us we encourage them to tell us about their condition so that we can support them as appropriate.

If an employee experiences difficulties at work because of their disability, they should contact The Group HR Department to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The Group HR Department may wish to consult with them and their medical adviser(s) about possible adjustments. We will

consider the matter carefully and try to accommodate their needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

6. Age Discrimination

It is unlawful to directly or indirectly discriminate against or to harass or victimise a person because of their age. Age discrimination does not just provide protection for people who are older or younger. People of all ages are protected.

We will not discriminate directly or indirectly, harass or victimise any person on the grounds of their age. Our Recruitment businesses will encourage clients not to include any age criteria in job specifications and every attempt will be made to encourage clients to recruit on the basis of competence and skills and not age.

We are committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age. No age requirements will be stated in any job advertisements on behalf of the RTC Group.

If we request age as part of our recruitment process such information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the company holds on all employees and workers and for equal opportunities monitoring process. In addition, if under 22 years old, to adhere to the Conduct of Employment Agencies and Employment Business Regulations 2003 and other relevant legislation applicable to children or young candidates.

7. Part-Time Work

This policy also covers the treatment of those employees who work on a part-time basis, we recognise that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity and parental leave and access to our pension scheme. We also recognise that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

8. Gender Reassignment

We recognise that any employee or worker may wish to change their gender during the course of their employment or assignment with us.

We will endeavour to support any employee or worker through the reassignment and we will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

Where an employee is engaged in work where the gender change imposes genuine problems we will make every effort to reassign the employee to an alternative role in the Company, if so desired by the employee.

Any employee or worker suffering discrimination on the grounds of gender reassignment should have recourse to the Company's grievance procedure or complaints procedure.

9. Training on Equality, Diversity and Inclusion

In order to promote an environment free from discrimination, bullying, harassment and victimisation we will ensure that our employees and managers receive relevant training as required.

10. Monitoring

We will ask candidates, employees and workers for information relating to their protected characteristics. We do this to:

- establish whether our Equality, Diversity and Inclusion Policy is effective in practice;
- ensure that our employment and recruitment practices are fair;
- analyse the effect of other RTC Group policies and practices on different groups;
- highlight possible inequalities and where appropriate investigate their underlying causes; and
- take action where we think it is needed to address problems or reduce disparities.

Information is collected separately from applications and will not be used as part of the recruitment or selection process. The information is only used for monitoring purposes. We will protect the confidentiality of the information given to us.

11. Rights and Responsibilities

We are all responsible for treating everyone with dignity and respect whilst at work and when representing the Company.

In return we all have the right not to experience unlawful discrimination in the workplace. Employees and workers have a responsibility to understand this policy and help us to implement it through promoting equality, diversity and inclusion in their work.

All employees and workers have a duty not to discriminate against each other and not to help anyone else do so.

12. What to do if Discrimination Has Occurred

If an employee or worker has been discriminated against, please tell us.

Employees can speak informally with their line manager or a member of the Group HR Department and if they want to make a more formal complaint, they are encouraged to raise the matter through the **RTC Group Grievance Procedure**. If they believe there has been any bullying or harassment, then they should raise the matter through the **RTC Group Anti-Bullying and Harassment Procedure**. Candidates and

workers should use the ***RTC Group Complaints Procedure***. Allegations of potential breaches of this policy will be treated seriously.

Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. However, false allegations of a breach of this policy, which are found to have been made in bad faith will be dealt with under the ***RTC Group Disciplinary Procedure***.

13. What Will Happen if an Employee or Worker Acts in a Discriminatory Way?

We apply a zero-tolerance approach to discrimination. If, after investigation, we decide that an employee's behaviour breaches this policy they may be subject to disciplinary action up to and including dismissal. This applies to the most senior levels of management as well as to all other employees.

14. Policy Review and Promotion

We will promote and publicise our Equality, Diversity and Inclusion Policy as widely as possible using our intranet, website, application packs, induction packs, notice boards, handbooks, and annual reports.

We will review our Equality, Diversity and Inclusion Policy on a regular basis.

15. Data Protection

The data provided will constitute special categories of personal data under data protection legislation and will therefore only be processed in accordance with data protection principles.

16. Related Policies

Employee Policies

- ***RTC Group Bullying and Harassment Procedure***
- ***RTC Group Grievance Procedure***
- ***RTC Group Disciplinary Procedure***
- ***RTC Group Performance Improvement Procedure***
- ***RTC Group Absence Policy***
- ***RTC Group Data Protection Policy***

Worker Policies

- ***RTC Group Complaints Procedure***