

Equality & Diversity Policy

1. Policy Statement

- 1.1 The Norse Group is wholly committed to promoting fairness and equality of treatment, encouraging diversity and eliminating discrimination amongst its workforce. We aim for our employees to be truly representative of all sections of society.
- 1.2 The Norse Group opposes all forms of discrimination, harassment or victimisation whether because of age, disability, sex, gender-reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership ('Protected Characteristics') or otherwise.
- 1.3 The Norse Group will not tolerate discrimination or unfair treatment in any aspect of employment. Selection for employment, promotion, training or any other benefit will be on the basis of merit.
- 1.4 The Norse Group is committed to making reasonable adjustments in order to ensure that all employees are supported and encouraged to develop their full potential and talents.
- 1.5 The Norse Group will ensure that its practices and policies follow and comply with statutory requirements. All employees, contractors, suppliers, clients and members of the public will be treated fairly and with respect.

2. Types of Unlawful Discrimination

- 2.1 **Direct discrimination** is where a person is treated less favourably than another because of a Protected Characteristic. Save for exceptional circumstances, direct discrimination can never be justified. An example of direct discrimination would be refusing to employ a woman because she is pregnant.
- 2.2 **Indirect discrimination** is where a provision, criterion or practice applied by or on behalf of the employer is discriminatory in relation to individuals who have a Protected Characteristic by placing them at a particular statistical disadvantage. Indirect discrimination cannot be justified unless it is a proportionate means of achieving a legitimate aim. An example of indirect discrimination would be excluding part-time workers (who statistically are mainly female) from access to certain benefits.
- 2.3 **Harassment** is where there is unwanted conduct, related to a Protected Characteristic, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment can never be justified. An example of harassment would be telling racist jokes which have the purpose or effect of causing offence.
- 2.4 **Associative discrimination** is where an individual is directly discriminated against because of their association with someone else who has a Protected Characteristic. An example of associative discrimination would be teasing a colleague because their son is undergoing gender-reassignment.
- 2.5 **Victimisation** occurs where an employee is subjected to a detriment because they have done a 'protected act' such as asserting their rights under the Equality Act 2010 or supporting someone else to do so. An example of victimization would be refusing to

approve annual leave because someone had alleged disability discrimination.

2.6 **Failure to make adjustments** works in a different way, but is still a type of discrimination. It will arise where there is a provision, criterion or practice or a physical feature of premises which places a disabled person at a substantial disadvantage compared with non-disabled people and their employer fails in its duty to make reasonable adjustments to remove that disadvantage.

3. What is Diversity ?

3.1 Diversity is a positive and proactive way of enhancing the business environment and improving the quality of service which The Norse Group can deliver to its clients. Diversity is about recognising and valuing people's different backgrounds, knowledge, skills and experiences, and encouraging and using those differences to create a productive and effective workforce.

3.2 To provide real equality of opportunity, people often need to be treated differently in ways that are fair and tailored to their needs. Diversity is not about treating everyone the same, but rather treating everyone as individuals in a fair manner.

3.3 It is important to The Norse Group to create an environment in which its employees can work together harmoniously by combating prejudice, stereotyping, harassment and undignified and disrespectful behaviour.

4. Recruitment and Selection

4.1 Advice and training will be provided to managers on good recruitment and selection practices with due consideration to equality and diversity.

4.2 Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability.

4.3 Job adverts will be drafted and advertising decisions made to maximise the exposure and opportunity to all sections of society.

4.4 The shortlisting, interview and selection process will be based upon aptitude and ability.

4.5 The recruitment and selection process will be monitored to ensure that The Norse Group complies with equal opportunities legislation and to ensure equality of opportunity. Information being collated will be kept confidential and separate from the application form.

5. Working Practices

5.1 The Norse Group will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the organisation considers it has sound business reasons for doing so.

5.2 The Norse Group will comply with its obligations in relation to statutory requests for contract variations. [insert] will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

6. Learning, Development and Progression

6.1 All new employees will receive structured induction training in order to give them a good understanding of The Norse Group and its policies and procedures.

6.2 The Norse Group will ensure that there is equal treatment and equal access to training for all staff, save where there are sound business reasons for not doing so.

6.3 Managers will individually identify and address the development needs of all employees with regard to their skills, talents and experiences, both to improve performance within their current role and to develop their skills for potential future opportunities. Managers will receive the appropriate training to carry out appraisals and performance management.

6.4 Selection criteria for promotion will be implemented in accordance with the policy governing recruitment and selection and will be based solely on merit and ability.

7. Monitoring

7.1 All HR policies, procedures and any collective agreements will be regularly reviewed to ensure they embed the principles of equality and diversity.

7.2 The Norse Group Human Resources will monitor the composition of the existing workforce and of applicants for jobs (including promotion) in respect of diversity and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

7.3 Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.

8. Support for individuals who experience or witness discrimination, harassment, or victimisation.

8.1 Any employee who considers that they have been treated contrary to this policy, or who believes a colleague to be subject to such a breach, should raise the matter immediately with the Group HR Director.

8.2 The Norse Group views acts of discrimination, harassment or victimisation extremely seriously and all complaints of this nature will be dealt with promptly, fairly and confidentially. The Norse Group will fully support employees who make such a complaint throughout the process provided that the complaint is made in good faith.

8.3 Any complainant who is not an employee of The Norse Group should direct their complaint to the Group HR Director.

8.4 No employee or member of the public will suffer victimisation as a result of raising a complaint, or providing information, relating to a breach of this policy.

9. Breaches of this Policy

- 9.1 Every employee is required to assist The Norse Group in meeting its commitment to equality and diversity.
- 9.2 Any act of discrimination, harassment, bullying or victimisation against employees, contractors, clients, or any other member of the public, is likely to be deemed an act of gross misconduct leading to summary dismissal. This may apply even if the act is committed whilst the employee is not at work.
- 9.3 Employees must also be aware that they can be held personally liable as well as, or instead of, the organisation for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.