



Norse Group DEI&B Policy

Prepared by: HR



United in Purpose

Norse Group Limited – Nor-hur-pol-42 – Diversity, Equity, Inclusion and Belonging Policy

Owner: HR

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1. Scope and Status

- 1.1 The rights and obligations set out in this policy applies to all employees of Norse Group ('Norse'), and its subsidiaries, regardless of seniority or grade.
- 1.2 This policy also applies to casual workers and agency workers.

2. Policy Statements

- 2.1 This policy sets out Norse's approach to diversity, equity, inclusion and belonging ("DEI&B"). Norse is committed to promoting equity and diversity and promoting an inclusive culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work.
- 2.2 Norse are passionate about a workplace culture where employees have a sense of belonging which enables and empowers them to achieve their full potential.
- 2.3 This policy's purpose is to recognise the barriers and biases with regard to DEI&B and to take a positive action to overcome specific inequalities, discrimination, disadvantages and marginalisation experienced by certain groups and individuals including those protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender), sexual orientation and trade union membership. under the Equality Act 2010.
- 2.4 Within our values we empower voices to be heard and for employees to make and find solutions. Norse creates a supportive and inclusive environment for our organisation to work in partnership with others. We require all our employees to treat each other, the public, our stakeholders and partners with respect; and we want to maintain a working atmosphere in which everyone delivers a high-quality service.
- 2.5 Norse, and our customers will benefit from a diverse employee base, that reflects the variety of people that we serve; one that has high safety standards and is inclusive, flexible and responsive.
- 2.6 Embracing diversity means that we acknowledge the full breadth of people who work for us and reflect that variety within our teams. We welcome different and fresh ways of thinking, encourage innovation and a culture of speaking up where things can be done better. Such a workplace is best established when people feel that can express their views freely within the context of our values.

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3. Definitions

- 3.1 Equity – Equity aims to ensure that all individuals have equal opportunities and access to what they need to succeed. Equity prevents individuals from being discriminated against or treated differently due to certain personality traits or physical characteristics.
- 3.2 Diversity – Diversity is a term which encourages us to recognise that everyone is different in a variety of ways and that those differences are to be celebrated, respected, valued and promoted. This includes, but is not limited to, diversity of gender, sex, race, ethnicity, age, sexual orientation, language, and other attributes. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions which is beneficial not only for the individual but for Norse.
- 3.3. Inclusion – Inclusion is the way in which we ensure that all individuals within our workplace feel included and that we embrace people in all their diversity, creating a workplace environment that is fair for all and enables all individuals to be their authentic selves- enabling them to achieve their full potential and to know that their contribution matters.
- 3.4 Belonging – Belonging is defined as the feeling of security and support when there is a sense of acceptance, inclusion, and identity for a member of a certain group or place. When people feel a sense of belonging, they can share ideas, confidently speak up, and fully contribute.
- 3.5 Allyship – Allyship is the process, by a member of an ingroup, of emphasising and supporting inclusion and human rights to advance the interests of a diverse and/or marginalised group.

DEI&B Legislation

Norse has a legal obligation to ensure that it does not discriminate unlawfully in line with the below statutory legislation:

- Equality Act 2010
- Equal Pay Act 1970
- Rehabilitation of Offenders Act 1974 (and Exceptions Order 1975)
- Employment Rights Act 1996

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Protected Characteristics (based on the Equality Act 2010)

Type	Description
Age	How old someone is
Disability	A person has a disability if they have a physical and / or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. This includes neurodiversity
Gender affirmation	This is the process of transitioning from one gender to another. Gender affirmation is when someone chooses to transition to live their life as the gender they identify with. This could be done in several ways, including presenting as this gender, having gender affirmation surgery, or beginning hormone treatment – it is entirely based on personal choice. Gender affirmation is known as “gender reassignment” in the Equality Act 2010, but we acknowledge it differently because we believe that someone who transitions is affirming their gender identity.
Gender expression	Gender expression encompasses all gender identities, including female, male, trans-male, trans-female, non-binary and more. It is the way in which a person expresses their gender identity, typically through their appearance, dress, and behaviour. The Equality Act 2010 defines this as ‘sex’, which is what you are assigned at birth (male or female); this does not always correspond with the gender you identify with; therefore we have chosen to define it differently. Marriage and civil partnership Marriage is a union between a man and a woman or between a same-sex couple. Couples can have their relationships legally recognised as 'civil partnerships'.
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity is protected for the 26 weeks and refers to the period after the birth. This also includes people who are going through In Vitro Fertilisation (IVF).
Race	Race encompasses people who are defined by their race, skin colour, nationality, citizenship, ethnic or natural origin.
Religion or belief	Religion is the commitment to any religion, or lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief must affect your life choices or the way you live to be considered a belief.
Sexual orientation	Who you are sexually attracted to.

What is discrimination?

Breaches of Norse’s commitment to equity and diversity can take many forms. Norse will endeavour to ensure that no clients, employees, workers, contractors, volunteers, applicants, service users or any other stakeholder is discriminated against, either directly or indirectly. Below are some examples of what could be deemed as discrimination:

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Type	Description
Direct Discrimination	Treating a person less favourably on the grounds of their ethnicity, gender, pregnancy and maternity, marriage and civil partnership, age, disability, gender reassignment, sexual orientation), religion or belief.
Indirect Discrimination	Indirect Discrimination intended to discriminate has the unwitting effect of doing just that and cannot be objectively justified as a proportionate mean of achieving a legitimate aim.
Victimisation	Where an individual is treated less favourably because they have made a complaint against the Norse Group under the Equality Act.
Harassment	Harassment may involve physical acts or verbal and non-verbal communication and gestures. For further information on bullying and harassment, please refer to Norse Group's Dignity at Work policy.

4. Policy

- 4.1 Norse is proud to be an employer that embraces individuality and is passionate about building inclusive teams. Norse focuses on creating a collaborative culture where employees can be themselves, where their voices are heard, and where they can truly belong.
- 4.2 Norse is aware that to create and maintain a happy healthy organisation, we have to work hard to ensure inclusion isn't just what we do but who we are.
- 4.3 Norse's objective is to be an open, diverse and inclusive organisation. To realise this Norse is committed to providing a great working environment which recognises that people from different backgrounds, experiences and abilities can bring fresh ideas and innovation to improve our business and practices.
- 4.4 Norse acknowledges that our Trade Unions play a vital role in working jointly to develop a more diverse and inclusive culture in the organisation. Norse commits to working within the existing agreements or to develop these by negotiation in order to help deliver this diversity, equity, inclusion and belonging policy.
- 4.5 Norse wants to ensure that diversity, equity, inclusion and belonging is embedded in our culture, and reflected in our people and behaviours, all of which will help us to better serve our customers. Norse will endeavour to:
- provide fair and open access to development opportunities in order to fully utilise the talents of all Norse employees

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- improve the recruitment and retention of people from diverse backgrounds
- ensure that employment decisions are objective, and reflect the collective agreements that have been established where appropriate
- enhance decision-making and innovation, by encouraging positive interactions and involvement throughout the business
- increase our ability to relate to existing and potential customers wherever they exist
- build effective and productive relationships in the wider community through partnerships with community -based groups and stakeholders
- be committed to exceeding the minimum legal requirements
- ensure that people are treated fairly and protected from discrimination, bullying or harassment and to take appropriate steps when complaints arise
- be committed to reviewing all existing policies within Norse to ensure they demonstrate our equity, diversity and inclusion values

4.6 The purpose of this policy is to set out the roles and responsibilities of everyone at Norse, to uphold our commitment to equity, diversity, inclusion and belonging. We are committed to a workplace free from processes, attitudes and behaviours that amount to harassment or discrimination. We have a zero-tolerance policy on bullying, harassment and discrimination, which includes any person at, or acting on behalf of Norse.

5. Responsibilities

- 5.1 The Board of Trustees have ultimate responsibility for the policy and are responsible for championing DEI&B.
- 5.2 The Senior Management Team are responsible for ensuring compliance with this policy.
- 5.3 The Chief Executive Officer is responsible for ensuring that this policy allows achievement of external and internal standards.
- 5.4 The HR Department is responsible for the development, monitoring, and review of this policy.
- 5.5 Our people are all responsible for adhering to this policy.

6. Norse's Commitment

- 6.1 Norse employees have a right to work without being subjected to any form of bullying, harassment, victimisation and unlawful discrimination. Norse takes complaints of this nature very seriously and appropriate action will be taken in line with Norse's Dignity at Work and Grievance Policy alongside Norse's Disciplinary procedure when applicable. Particularly serious complaints could amount to gross misconduct.

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- 6.2 Furthermore, Norse will not accept service users disregarding the rights of Norse employees. If situations of this nature occur Norse will act robustly in these circumstances to ensure Norse employees are not subjected to any form of bullying, harassment, victimisation, and unlawful discrimination.
- 6.3 Harassments under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic or those covered under the Equality Act 2010 – is a criminal offence.
- 6.4 Norse will support employees who are protected by the Equality Act 2010 and will consider reasonable adjustments in the workplace. Norse will encourage open and honest conversations regarding any conditions that may be covered under the Equality Act 2010 by promoting an open and safe environment for them to share information with us. Individuals are encouraged to speak directly with their manager to discuss any potential reasonable adjustments which may support them at work.
- 6.5 Throughout the year, Norse will acknowledge a range of events that celebrate cultural diversity. These will be in line with our Wellbeing Strategy across Norse.
- 6.6 We are pledging to introduce a number of ongoing commitments within 12 months by signing the Anti-Racism charter. This sets out that our leaders will recognise the need and benefit in championing a racially diverse workforce as well as challenging racism internally and externally, amongst other charter requirements.

7. Employee Commitment

- 7.1 Employees must ensure that the dignity and rights of members of the local community, customers and other employees are recognised and always protected. They must be treated with fairness, equity, and courtesy in accordance with both organisational policies and the law. Employees must not allow prejudice or bias to influence them in carrying out their work.
- 7.2 All employees should understand that they can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination in the course of their employment, against fellow employees, customers, suppliers and the public.

8. Equal Opportunities and diversity in practice.

Religious Observance

- 8.1 The Employment Equality Regulations (Religion and Belief) 2003 gives employees the right to request annual leave for special festival or spiritual observance days. It does not provide a statutory obligation on the part of the Norse to grant such leave.
- 8.2 Requests for time off should be made in accordance with normal departmental procedures and the needs of the service. Some religious festivals can occur at short notice and managers should take this into account when considering the request.

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- 8.3 While requests for leave for religious observances will be considered sympathetically, employees should also recognise that they have a responsibility to be reasonable and to consider the needs of the service when making the request.

9. Recruitment, Selection and Career Progression

- 9.1 Norse will, as part of our Equity, Diversity, Inclusion and Belonging Policy ensure that the diversity of the workforce is reviewed and monitored to support and champion underrepresented groups.
- 9.2 All employees will be encouraged to develop their skills and fulfil their potential and to take advantage of training, development, and progression opportunities in Norse.
- 9.3 Selection for employment, promotion, training, or any other benefit will be based on aptitude and ability, apart from any necessary exceptions in accordance with the Equality Act 2010.

10. Dealing with complaints

- 10.1 Norse will treat seriously all complaints of discrimination or harassment related to any of the grounds set out in the Equality Act 2010, irrespective of whether the complaint is made by an employee, manager, service user, or any other relevant third party.
- 10.2 Employees who believe that they have not been treated equitably in accordance with this policy, or have a complaint of discrimination, harassment or victimisation may make their complaint using the Norse Group's Grievance Policy, the Dignity at Work Policy or Whistleblowing Policy. Alternatively, employees may wish to opt for the complaint to be handled on an informal basis, through discussion with their manager or HR Advisor in the first instance. In this circumstance, employees may approach their manager or (if preferred) a member of the HR department through the HR Knowledge Hub for advice and guidance.
- 10.3 Any service user or relevant third party who believe they have not been treated equitably in accordance with this policy or have a complaint of discrimination, harassment or victimisation may make their complaint by emailing ASKHR@norsegroup.co.uk.
- 10.4 Any breach of this policy is likely to be deemed a disciplinary offence and may be dealt with through the Norse Group's Disciplinary procedure. Any employee found to have unfairly discriminated, harassed, or victimised a service user, third party, another member of staff, a worker, a volunteer or a contractor may be dismissed. Where action short of dismissal is appropriate, this may include a requirement for the individual to attend suitable training.
- 10.5 Any breach of this policy by a third party will result in the third party's employer, if applicable, being contacted and a formal complaint being made using the employer's procedures. Any breach of this policy by a service user, will result in a review of the

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provision of service. If appropriate, Norse will seek to follow legal proceedings.

11. Freedom to 'Speak up'

11.1 Everyone has a right and a duty to report a relevant whistleblowing concern. Please refer to Norse Group's Whistleblowing Policy.

11.2 Concerns may be raised orally or in writing, and may be raised with:

- the employee's manager or, if this is not appropriate because they are involved in the matter of concern, their manager
- with any director of any Norse company involved in the matter (full details of Norse company directors can be found online at <https://find-and-update.company-information.service.gov.uk>)
- alternatively, employees may choose to utilise the option of 'Speak Up', where they can raise a concern that will go directly to the HR department and then passed to the Group HR Director, or the SHEQ Director. To raise a concern via 'Speak Up', employees can either raise this via this HR Knowledge Hub, or email 'AskHR@norsegroup.co.uk, putting the subject header as 'Speak Up'.

12. Reasonable Adjustments

12.1 Under the Equality Act 2010 employers and organisations have a responsibility to make sure that people with disabilities can access employment and services as easily as non-disabled people. This is known as the 'duty to make reasonable adjustments.' People with disabilities can experience discrimination if an employer or organisation doesn't make a reasonable adjustment. This is known as a 'failure to make reasonable adjustments.' Norse is committed to supporting all employees and wherever possible will ensure reasonable adjustments are put into place for those that need them.

13. Monitoring

13.1 We will collect and monitor diversity-related data to better understand the experiences of our people and identify and remove barriers, ensure our policy and strategies are working effectively and set EDIB targets.

14. Training and support

14.1 To ensure compliance with the policy, our employees will complete mandatory training.

Employee Assistance

All Norse employees and their relatives can access support provided by Health Assured. Health Assured provides a 24 hour confidential helpline, providing advice, guidance and counselling on a wide range of topics including mental health, financial wellbeing, legal advice and substance misuse.

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Mental Health First Aid

Norse recognises that there may be occasions throughout an employee's employment in which they require additional support due to their mental health. Whilst Norse encourages employees to inform their line manager, Mental Health First Aiders are available across the business to provide specialist support and assist employees to ensure they access appropriate support both internally and externally.

All employees are welcome to express their interest in becoming a Mental Health First Aider. For more information, please refer to the Intranet or Line Manager.

External

- Samaritans - You can contact them 24 hours a day, 365 days a year. You can call 116 123 (free from any phone), email jo@samaritans.org or visit some branches in person. You can also call the Samaritans Welsh Language Line on 0808 164 0123 (7pm–11pm every day).
- Black Minds Matter UK – A charity supporting Black people to access mental health services. The Black, African and Asian Therapy Network – A network offering resources and information relating to mental health and wellbeing. They work to connect Black, African and Asian people with therapists of the same background.
- Mind – A national mental health charity providing information, advice and support. National Bullying Helpline – A national charity with a helpline that is available 9am–5pm, Monday to Friday: 0300 323 0169.
- Scope – Scope's helpline provides free, independent and impartial advice and support on issues that matter to disabled people and their families. They can be contacted by phone 0808 800 3333 or textphone dial 18001 then 0808 800 3333 (Monday to Friday 9am – 6pm, weekends 10am–6pm), or by email helpline@scope.org.uk

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