

Policy Summary

This document sets out our commitment to managing equality and diversity within EFT Group Ltd and for dealing with any form of discrimination and harassment of any individual or group because of their age, disability, ethnic or national origin, race or colour, gender, HIV status, marital status, religious or political beliefs, sexual orientation, trade union activities and unrelated spent criminal convictions.

EFT is committed to creating an organisational culture in which diversity and equality of opportunity are promoted actively and in which unlawful discrimination is not tolerated.

EFT recognises the real business benefits of having a diverse community of staff and to this end, is working towards building and maintaining an environment which values diversity.

In developing our procedures we have incorporated the principal objectives of:

- **Human Rights Act 1998**
- **Equality Act 2010**

1.0 Policy Statement

1.1 EFT is committed to ensuring that our policies, procedures and practices provide fair and equal treatment to all in the provision of services and the employment of staff and contractors.

1.2 In strict accordance with the Equality Act 2010, It is against EFT's policy for any employee to act in a discriminatory manner, either directly or indirectly, or to harass or intimidate any other employee or potential employee because of their age, disability, ethnic or national origin, race or colour, gender, HIV status, marital status, religious or political beliefs, sexual orientation, trade union activities or unrelated spent criminal convictions.

Any individual found guilty of doing so will face disciplinary action. Any instance of discrimination at EFT will be dealt with quickly and confidentially, and will be put in writing from the first stage of the procedure. Senior management will be heavily involved in disciplinary procedures, ensuring that everybody has an opportunity have their say before a conclusion is reached.

EFT fully investigate such incidences and will dismiss anyone found guilty of gross misconduct. Any sanction is open for appeal.

1.3 We recognise that the following groups may traditionally experience disadvantage, intolerance and discrimination.

- Older people
- Young people
- Women
- People with a disability
- People from Black and Minority Ethnic (BME) communities
- Gypsies and Irish Travellers
- People with HIV or Aids
- Asylum seekers and refugees
- Lesbians, gay men, bi-sexual men and women
- Trans-gender/trans-sexual people
- People of a particular faith or with particular beliefs or non-beliefs
- Ex-offenders

1.4 We will require those who work with us and from whom we purchase goods and services to share our vision and they will be required to demonstrate their commitment.

1.5 The Equality and Human Rights Commission, as set out under the principles of the Equality Act 2010, is a legislative framework by which we align our company's model for working in an anti-discriminatory in terms of our employment policy

Within this model, we observe and practice the codes of conduct for dealing with:

- Recruitment and promotion within EFT
- Equal Pay
- Discrimination of any kind in every aspect of the company's operations

1.6 This policy sets out the principles we will adopt in managing equality and diversity within EFT, and for dealing with any form of discrimination and harassment of any individual or group.

1.7 In accordance with the Human Rights Act 1998 we strive, as a company, to eliminate any behaviour which isn't compliant with legislative demands. Our policy clearly sets out ways in which we will tackle, and prevent, any form of discrimination or breach of human rights.

2.0 Extent of the policy

2.1 This policy applies to every job applicant, employee and to those who provide EFT Group with goods and services. It applies to all of our activities, including:

- Recruitment, training and development of our employees and employment practices
- Appointment of contractors, consultants and suppliers

2.3 It is the responsibility of every employee and representative of EFT Group to adopt the policies and procedures that tackle discrimination, to comply with the terms of all relevant legislation and promote best practice in all aspects of equality and diversity.

2.4 Reports of discrimination, harassment or intimidation will be dealt with both seriously and sensitively and appropriate disciplinary action, including dismissal for serious offences, will be taken against any employee who is found to be in breach of the terms of this policy.

2.5 is the policy of EFT Group that any form of victimisation, discrimination or harassment that occurs within the company will be treated as a disciplinary offence.

2.6 Any sub-contractor who is found to have committed an act of unlawful discrimination will face disciplinary procedures. Discriminatory conduct and sexual or racial harassment shall be regarded as gross misconduct.

All sub-contractors will receive an induction which includes awareness training on this policy and both sub-contractors and EFT's employees will be required to follow the instructions of the policy

All employees are given a contract of employment which consists of Terms and Conditions of Service with an Employee Handbook which clearly details all employment conditions. This is regularly reviewed to ensure that direct or indirect discrimination is not occurring.

Sub-contractor selection will be regularly monitored in conjunction with ethnic records of job applicants and existing employees.

EFT is committed to a programme of action to make this policy fully effective

3.0 Legislative and Regulatory Requirements

3.1 We will comply with the requirements of relevant legislation, regulatory guidance and good practice with respect to our customers and employees and ensure that our policies and practices are reviewed in light of any changes to these.

4.0 Key Areas

We have identified five key areas in which we will implement and monitor our work:

4.1 Leadership and Partnerships

4.1.1 We will work towards ensuring that EFT Group' management and senior management team reflects the community in which we work. Our senior managers will champion and promote our commitment to equality and diversity in the course of their duties.

4.1.2 We will proactively develop partnerships with key organisations we work with and support the diverse range of residents within the borough and develop joint working initiatives with such partners.

4.2 Customer Service

4.2.1 We will promote equality and diversity by collecting and using the fullest possible information to establish the needs of our residents and use this information to tailor services, develop policies and procedures and ensure that services are accessible. We will provide facilities and methods of service delivery to ensure that our services are accessible to all.

4.2.2 We will communicate openly and honestly and produce information and materials in a wide range of accessible formats in line with our customer service policy and our communications policy. Examples may include large print, audio tape and alternative languages.

4.2.3 We will train and support staff to deliver the appropriate level of service, in line with our customer service policy.

4.3 Training, Recruitment and Employment

4.3.1 We will ensure that our employment practices meet with appropriate legislation and will monitor our staff profile to ensure progress towards a diverse workforce which reflects the community in which we work.

4.3.2 We will advertise vacancies simultaneously both internally and externally, via appropriate mediums and forums and include a short statement informing prospective applicants of our commitment to equality and diversity in all vacancy adverts. Where practicable, we will provide appropriate aids and adaptations for qualified people with disabilities to enable them to obtain and retain employment within the company

4.3.3 We will ensure that our commitment to equality and diversity is evident in our employment practices, including internal pay and promotion decisions, access to opportunities for learning and development, redundancy and the operation of disciplinary and grievance procedures, flexible working and leave arrangements, in line with our conditions of employment. We will monitor these areas to ensure compliance.

4.3.4 EFT commit to ensuring that every vacancy is to be notified to an agency at least three working days before recruitment from other sources, and candidates identified by these agencies are to have an equality of opportunity in the selection process.

We understand the importance of demonstrating commitment to offering a wide range of employment opportunities of to engage the community in which we work.

Recruitment approaches may be as follows:

- Job Centre Plus
- Specialist Recruitment Agencies

- Publications - local press & industry journals
- Schools/colleges
- Connexion Partnership services
- Staff Referrals

4.3.5 In respect of promotion, we offer fair promotion opportunities to all employees, this will generally mean offering internal promotions as opposed to recruiting from external sources.

This can often be linked to training initiatives with the organisation. This means offering business related or technical training schemes. Typically, these may be:

- National Skills Academies
- Internal training programmes

EFT further encourage staff to achieve promotion and development by carrying out internal assessments, work place recording, and by handing out developing training performance programmes to help monitor training.

4.3.6 A training and development strategy will be implemented for all new starters and TUPE transferees, including a comprehensive contract induction. EFT comply with the Equality Act 2010 when managing staff transfers. EFT will ensure there is no discrimination where TUPE applies, particularly around continuous employment rights and equal pay legislation.

4.3.7 We will provide training in and communicate equality and diversity issues for all staff and inform them of their rights to protection from harassment, discrimination or victimisation.

Our communication of equality includes:

- Employee handbooks
- Awareness training
- Asking staff to contribute to our policy

Managers and staff are encouraged to contribute to our on-going equality improvement process and are asked to provide input into our evolving policy. This helps promote good relationships between all employees and helps employees understand and value one another. Equality communication is provided regularly, both on a formal and informal basis. Any changes to our policy are briefed to our staff and management team. Managing Director, Steve Raynor, is responsible for reviewing, enforcing, and communicating this policy throughout the organisation.

4.3.8 EFT continually trains our managers and supervisors in matters relating to quality and diversity during their work activities. EFT have carried out training and refresher briefings in respect of managing equality and diversity which includes sexism, racism, harassment, bullying, religion, disability and other forms of discrimination.

Our training is designed to protect employees and our customers from discrimination on any grounds, promote the diversity of our workforce, and help provide an open environment in which our staff can work and feel valued in. Our training and refresher courses help keep our policy fresh and up-to-date, monitor the effectiveness of our policy, and identifies where we need to take action to further promote diversity and address any inequalities.

The training we provide asserts our commitment to providing equality throughout the organisation, and helps encourage and manage diversity. Through these training initiatives, we can help create an environment in which our staff can feel valued and are encouraged to express their diversity.

This is re-briefed annually to all staff and is evidenced in our training matrix and training needs analysis.

All of our training is designed to comply with the Equality Act 2010, which integrates the principles of the Equal Pay Act 2010, Sex Discrimination Act 1975, the Race Relations Act 1976 and the Disability Discrimination Act 1995, Employment Equality (Religion or Belief) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003 and the Employment Equality (Age) Regulations 2006

4.3.7 EFT Group Ltd is an equal opportunity employer. The aim of our policy is to ensure that no job applicant or employee receives less favourable treatment on the ground of race, colour, nationality, ethnic or national origins, sex, marital status, or religion, or is disadvantaged by conditions or requirements which cannot be shown to be justifiable. Selection criteria and procedure is reviewed to ensure that individuals are selected, promoted and treated on the basis of their relevant merits and abilities. All employees will be given equal opportunity and, where appropriate, special training to progress within the organisation.

5.0 Implementation, Monitoring and Review

5.1 Our Managing Director, Steve Raynor, has ultimate responsibility for implementing and updating our Equality Policy. Our review procedure demands that our Senior Management Team receive a full update on any developments within our Equality Policy on a quarterly basis.

Steve Raynor, as well as EFT's other directors, are responsible for ensuring that EFT meets its legal obligations in respect of legislation relating to equal opportunities and that appropriate action is taken against individuals who don't act in accordance with those obligations.

5.2 This policy document will be reviewed on an annual basis and monitored with respect to the latest legal position.

5.3 We will measure our performance against key performance indicators in key areas of service provision and the make-up of our workforce and take action to redress any areas of inequality.

5.4 We will train our employees in equality and diversity and ensure that they understand the moral, business and legal role and implications of equality and diversity in our company.

Signed

Adam Watts

Adam Watts - CEO

November 2019