

Equality & Diversity Policy

Policy Statement

Corndel is fully committed to provide equal opportunities for all employees, workers and job applicants, and stakeholders and to eliminate unlawful and unfair discrimination. The Company aims to create a culture that encourages and values diversity, and that appoints, rewards and promotes staff based on merit.

Corndel complies with all anti-discrimination laws, including the Equality Act 2010.

The Company will not unlawfully discriminate against any employee, worker or job applicant because of any 'protected characteristic':

- age
- disability
- gender reassignment
- marriage or civil partnership status
- pregnancy and maternity
- race (including colour, nationality and ethnic or national origin)
- religion or belief
- sex
- sexual orientation

Equally, the Company will not treat any employee, job applicant, or any person within Scope (below) less favourably because of the following reasons:

- they are (or are not) a trade union member
- they work part-time or on a fixed-term basis
- of their socio-economic background
- they have caring responsibilities

Scope

This policy applies to all employees, contractors, visitors, clients and stakeholders.

Introduction

The Policy Statement sets out the Company's commitment to ensure that all persons in Scope have equal opportunities. The remainder of this document sets out the Company's policy on equality and diversity, in particular:

- what the Company regards as acceptable behaviour at work, and what is not acceptable
- the rights and responsibilities of those to whom this policy applies
- the procedure for dealing with concerns or complaints
- how the Company will deal with any breach of this policy
- who is responsible for the policy
- how it will be implemented, monitored and reviewed.

This policy applies to all persons in Scope. All staff are responsible for ensuring that there is no discrimination in the workplace, as outlined in the policy statement, and for ensuring that this policy is applied on a day-to-day basis. They are also expected to apply the principles of equal opportunities and non-discrimination in their interactions with customers, suppliers, business partners and visitors. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant.

This policy has been drafted to ensure that it is workable, clear and easy to understand. This policy does not form part of your contract of employment and we may amend, update or supplement it from time to time. We will circulate any new or modified policy to staff when it is adopted.

This policy sets out the principles that should be applied to ensure equal opportunities in the areas of:

- recruitment and selection
- promotion, appraisal, transfer and training
- terms of employment, benefits, facilities and services
- grievance and disciplinary procedures, dismissals, resignations and redundancies.

This policy should be considered alongside other Company policies, such as those dealing with harassment and bullying and family leave (maternity, paternity, adoption and shared parental), copies of which are available from the People Team and Company intranet at <https://intranet.corndel.com/portfolio/policies-and-procedures>.

Responsibilities

Whilst all staff are responsible and must have due regard in implementing this policy, special responsibility for the practical application of the Company's E&D policy falls upon senior management, hiring managers, line managers and the People Team staff involved in the recruitment, selection, appraisal, promotion and training of employees and the way their terms of employment are fixed.

The People Team is responsible for this policy, its implementation, monitoring and review.

If you have any doubt or concern about this policy, or how it should be applied in any particular instance or situation, please contact the People Team as soon as possible.

Dealing with concerns or complaints

If you believe you have been unfairly treated in breach of this policy, you should follow the Company's Grievance Policy, which is available from the People Team (HR@Corndel.com) or Company intranet. Employees will not be victimised in any way for making such a complaint in good faith. Complaints of this nature will be dealt with seriously, in confidence and in a timely manner.

Complaints may also be made via the Company's whistleblowing operator. Please see the Corndel Whistleblowing Policy, which is available from the People Team (HR@corndel.com) or Company intranet for more information.

The Company will not tolerate behaviour that goes against this policy, and where an employee is alleged to have breached this policy, they will be subject to the Company's disciplinary procedure. Disciplinary action will be taken against any employee who is found to have breached this policy. Acts of unlawful discrimination and serious incidents of harassment and bullying will be treated as gross misconduct. Unwanted allegations that are not made in good faith will also be considered as a disciplinary matter. The Company will keep confidential records of ongoing matters dealt with in accordance with this policy and applicable laws.

Implementation

This policy is available from the People Team and the Company intranet.

The Company will ensure that all managers are provided with more detailed training on how to manage equality and diversity issues in the workplace. Other staff may also be required to attend equality and diversity training. Attendance at training will be compulsory if you are notified that you should attend a course.

Equality and Diversity Monitoring

The People Team requests and collects diversity data from employees and learners at various stages. The purpose of this is to measure how diverse Corndel's current workforce is and allow the Company to make equality improvements to ensure our processes are fair.

To monitor diversity in these areas, the Company will need to process personal data and special category data in accordance with the Corndel Data Protection and Privacy policies.

The Company will regularly monitor promotion and career development patterns to ensure that access to promotion, training and career development opportunities is not denied to particular groups or types of workers

Recruitment and Selection

Please see the Corndel Recruitment Guidance for more information as to how the Company implements best practice in its recruitment procedures.

Promotion, Transfer and Training

The Company will apply the following principles to appointments for promotion, transfer and training:

- examine assessment criteria and appraisal schemes carefully to ensure that they are not discriminatory, whether directly or indirectly
- monitor assessment criteria and appraisal schemes regularly and, where such criteria or schemes result in predominantly one group of workers (groups distinguished by individual protected characteristics, i.e. particular race, religion, gender) gaining access to promotion, transfer or training or being awarded a particular appraisal grade, check them to make sure this is not due to any hidden or indirect discrimination
- avoid traditional qualifications and requirements for promotion, transfer and training, such as length of service, years of experience or age unless they can be objectively justified by reference to the job requirements
- ensure that policies and practices regarding selection for training, day release and personal development do not result in an imbalance in training between groups of workers
- if any provision, criterion or practice relating to promotion, appraisal, transfer or training puts disabled workers at a substantial disadvantage for a reason connected with their disability, ensure that reasonable adjustments are made to eliminate or, if that is not reasonably practicable, reduce the disadvantage. For example, this could be making training available for a disabled worker in a different way, in a different location or at a different time
- where the role is a step up to an employee's current role, for example, the Senior Account Manager role is a 'step up' from the Account Manager role, it would be appropriate to promote the employee without an interview or advertising for this role i.e., when they have demonstrated that they are ready for the next step. Unless otherwise deemed appropriate, an employee should be interviewed first before being considered and promoted to a different role (which will at least be advertised internally) to the one they currently are in.

Terms of Employment, Benefits, Facilities and Services

The Company will apply the following principles to terms of employment, benefits, facilities and services:

- regularly review the terms of employment, benefits, facilities and services available to employees to ensure that they are provided in a way which is free from unlawful discrimination.
- ensure that part-time employees receive pay, benefits, facilities and services on a pro-rated basis to their full-time comparator unless otherwise objectively justified – managers who are responsible for part-time employees, should, in particular, take advice from the People Team when assessing pay (including any bonus) and benefits for part-time employees.
- if any provision, criterion or practice relating to terms of employment, benefits, facilities and services puts disabled employees at a substantial disadvantage due to a reason connected with their disability, ensure that reasonable adjustments are made to eliminate or, if that is not reasonably practicable, reduce the disadvantage. Managers responsible for disabled employees should, in particular, take advice from the People Team when assessing pay (including any bonus) and benefits for disabled employees.
- examine carefully and monitor regularly pay and bonus criteria, policies and practices and, if it appears that any group of employees are disadvantaged by them, check them to make sure that this is not due to any hidden or indirect discrimination.
- comply with its obligations in respect of gender pay gap reporting.

Grievances, Disciplinary Procedures, Dismissals and Redundancies

Employees who, in good faith, bring a grievance (or assist another to do so) either under this policy or otherwise in relation to an equality or equal opportunities matter, will not be disciplined, dismissed or otherwise suffer any adverse treatment for having done so.

No member of a particular group of employees with a certain protected characteristic will be disciplined or dismissed for performance or behaviour which would be overlooked or condoned in another group, unless there is genuine and lawful justification for different treatment.

Redundancy criteria and procedures will be carefully examined to ensure that they are not applied and do not operate in an unlawfully discriminatory manner.

The provision of any voluntary redundancy benefits will be equally available to all employees unless there is a genuine and lawful justification for doing otherwise.

Considerations Relating to Disability

Disabled people, including job applicants and employees, should be able to participate in all of the Company's activities fully, on an equal basis with people who are not disabled.

Due to the wide variety of potential disabilities, and the likelihood of a disability affecting different people in different ways, the Company does not prescribe rigid rules on how issues concerning disabled people should be dealt with. What is essential is that managers take all reasonably practical steps to ensure that disabled people are not less favourably treated or disadvantaged by comparison to people who are not disabled in relation to their work, working environment or by any provision, criterion or practice used by the Company. Managers need to be aware in particular that an employee on long-term sick leave or with intermittent sickness absence may be disabled.

The Company wants to ensure that disabled employees are not treated unequally in the following areas:

- recruitment and selection
- promotion, transfer and training
- terms of employment, benefits, facilities and services
- dismissals, resignations and redundancies.

For the purpose of this policy, a disability is a physical or mental impairment that has a substantial and long-term effect upon a person's ability to carry out normal day-to-day activities. Cancer, HIV infection and multiple sclerosis are disabilities from the point of diagnosis.

Some disabilities are immediately obvious, for example, use of a wheelchair, while other disabilities may not be apparent at all, for example, HIV infection. Certain conditions are not considered to be disabilities, for example, poor eyesight that is corrected simply by wearing prescription spectacles, or addiction to alcohol or other substances. If you would like further information about whether a particular condition is a disability you should contact the People Team (HR@corndel.com).

The general equality and equal opportunities principles set out earlier in this policy will apply in relation to disabled people whether they currently have a disability or have had a disability in the past.

The company will take all reasonable, practical steps to ensure that disabled people are able to participate in its business and activities on an equal basis, with people who are not disabled.

Annex 1

Equality Principles

As set out in the policy statement, there should be no discrimination in the workplace because of any of the protected characteristics, or other factors set out in the policy statement.

For the purposes of this policy, 'discrimination' includes direct and indirect discrimination and other 'prohibited conduct under the Equality Act 2010. Discrimination may take the form of:

- **Direct discrimination** – this is treating someone less favourably because of a protected characteristic. An example of this would be paying someone less because of their sex or because they belong to a particular racial group. 'Because of' is very wide and will cover behaviour that takes place, for example, because of sexual orientation, even if the person is not, in fact, gay, and even if the perpetrator knows that they are not gay. It also includes less favourable treatment because someone is associated with another person who has a protected characteristic, e.g. because a worker is the primary carer for a disabled child. Such treatment is unlawful unless, in relation to age only, it can be objectively justified, i.e. the employer can show that it is a proportionate means of achieving a legitimate aim.
- **Indirect discrimination** – this is treating a group of people in the same way, but in a way which adversely affects those with a protected characteristic. An example of this would be to implement a dress code where head-coverings are not allowed – although this rule is applied to everyone and not pinpointed towards one individual, it will adversely affect those employees who choose to wear head coverings for religious reasons, thus a form of indirect religious discrimination. Such treatment is unlawful unless it can be objectively justified.
- **Victimisation** – this is treating someone less favourably because they have made allegations of discrimination or asserted their right not to be discriminated against because of a protected characteristic. An example of this would be a disabled employee claiming that they had been discriminated against, who is then refused a reference by their manager because of that claim.
- **Harassment** – this is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature. It may also occur where someone harasses the victim, the victim either rejects or submits to the harassment and, because of that rejection or submission, that person then treats the victim less favourably. More information on what can constitute harassment is set out in the Company's Anti-harassment and Bullying policy.
- In the case of disability only, **discrimination arising from disability** – this is the unfavourable treatment of the disabled person because of something arising in consequence of their disability. Such treatment is unlawful unless it can be objectively justified.

- In the case of disability only, **the duty to make reasonable adjustments**
 - this duty comprises three requirements, each of which arises where a disabled person at a substantial disadvantage in relation to a ‘relevant matter’:
 - a) the first is a requirement, where a provision, criterion or practice puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take steps as it is reasonable to avoid the disadvantage.
 - b) the second is a requirement, where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take steps to avoid the disadvantage.
 - c) the third is a requirement, where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take steps to provide the auxiliary aid.

The Company will appoint, train, develop, reward and promote staff based on appropriate selection criteria.

The principles set out in this policy apply:

- in the workplace; and
- outside the workplace in a work-related context, such as on business trips, customer or supplier events or work-related social events.



Corndel Ltd
315 Highgate Studios
53-79 Highgate Road
London, NW5 1TL

Annex 2:

Equality and Diversity Principles

I have read and understood Corndel's Equality and Diversity Policy and agree to work to the expected standards. Regardless of my background and circumstances, I agree to treat all colleagues, clients and stakeholders with respect and dignity while carrying out the duties and responsibilities of my role.

Signature.....

Date.....

Print name.....

PLEASE RETURN TO THE PEOPLE TEAM



Document Approval

Role	Name	Version Approved	Date Approved
Document Owner	Annemarie Schofield	1.0	20/06/2019
Approved By	Mushall Khan	1.0	20/06/2019
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