

2025

KMP 005 Equality, Diversity & Inclusion Policy



Policies and Procedures

EMPLOYEE EQUALITY, DIVERSITY & INCLUSION POLICY

Introduction

This policy has been developed to demonstrate and implement Group Horizon's (hereafter called 'GHL') commitment to fostering an inclusive environment that embraces diversity and ensures equal opportunities for all. Diversity recognises that we are all different and involves building an environment where people are respected as individuals and where their diverse range of views, perceptions, qualities, experiences, and contributions are valued.

Diversity is about the culture and environment of work and whilst equality and diversity are different concepts, equality is an essential ingredient in achieving diversity.

The policy also sets out responsibilities of GHL, its employees, and its learners.

Fair, objective, and innovative practices

The principle of non-discrimination and equality of opportunity applies equally to the treatment of employees, learners, visitors, clients, customers, and suppliers.

GHL will access, recruit, and develop talent and potential and recruit both staff and learners from the widest possible market cross section that is available. Through this, insight can be gained into different markets and will generate greater activity to anticipate customer need.

Our intention is that both our staff and our learners reflect the diversity of our nation's population.

All staff and learners have the right to be free from harassment and bullying of any description or from any other form of unwanted behaviour whether based on gender, trans-gender status, race, disability, age, political or religious belief or sexuality.

All staff and learners have an equal chance to contribute and to achieve their potential.

Representation

Gender – both sexes are accurately represented and rewarded for their contribution and their achievement at all levels of the organisation, through:

- Challenging gender stereotypes and
- Supporting employees and learners in balancing their life at work and home

Gender Identity – Individuals are protected against all forms of discrimination and harassment related to their gender identity or expression, including those who are transgender or non-binary.

Marital status – Individuals are treated fairly and equally by GHL or its representatives in respect of their marital or family status.

Race¹ – and Ethnicity – The racial and cultural diversity of our communities is represented at all levels of the organisation and among our learners by:

- Challenging racial and ethnic stereotypes
- Understanding, respecting, and valuing diverse backgrounds and perspectives
- Implementing mandatory ethnicity pay gap reporting in line with current legislation.

Disability² – The abilities of individuals with disabilities are recognised and valued at all levels of the organisation by:

- Focusing on capabilities rather than limitations
- Challenging stereotypes about disabilities
- Making reasonable adjustments in the workplace and learning environments to help individuals achieve their full potential
- Complying with mandatory disability pay gap reporting as required by current legislation.

Age – diversity within the workplace and in the learning, environment is promoted, accepted, and valued through:

- Challenging age stereotyping and
- Recognising the benefits of a mixed age workforce

Religious belief and Political opinion – Individuals and groups are treated fairly in the workplace and learning environment regardless of political or religious opinion by recognising individual's freedom of belief and their right to protection from persecution and intolerance.

HIV/AIDS – Discrimination against an employee, a potential employee, or a learner on the grounds that he/she is thought to have AIDS/HIV is not acceptable and confidentiality will be respected at all times.

Sexuality – Individuals are treated fairly in the workplace or the learning environment through:

- Respecting choice of lifestyle and
- Challenging negative stereotypical values

Types of discrimination

Direct – Putting a person at a disadvantage for a reason related to one or more of the following grounds: gender, marital status, gender reassignment, ethnic or

¹ As of 2025, ethnicity pay gap reporting is mandatory for employers with 250 or more employees

² Disability pay gap reporting has become mandatory for employers with 250 or more employees.

national origin, religion, belief, trade union membership, political affiliation, part-time or fixed term status, age, or disability.

Harassment³ – Unwanted physical, verbal, non-verbal, or digital conduct that has the purpose or effect of affecting an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Employers are required to take reasonable steps to prevent sexual harassment and other forms of harassment in the workplace."

Indirect – less obvious discriminatory treatment i.e. where an individual is subjected to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of their gender, marital status, gender reassignment, ethnic or national origin, nationality, race, colour, sexual orientation, religious belief, trade union membership, part time or fixed time status, age, or disability.

Victimisation – treating a person less favourably than another on the grounds that he/she has taken legal rights against discrimination or to assist a colleague in some way.

Raising a complaint

In order for complaints about actions or conduct which breach this policy to be dealt with fairly and promptly, the employee /Learner should follow GH's grievance procedure as set out in the Employee/Learner Handbook and raise the complaint in writing with a Director explaining the full the nature of the grievance.

In respect of a learner, the individual has the right to complain about any Group Horizon representative and would raise the complaint in writing with a Director explaining the full nature of the grievance.

The complaint must:–

- Identify the alleged person
- Give specific examples of the actions or conduct that the employee believes constitutes discrimination or harassment: and
- Include times, dates, and names of any witnesses.

A meeting would then be arranged where the complainant could have a working colleague present to help to explain the situation more clearly. Alternatively, an official employed by a trade union or an official of a trade union who is certified as a worker's companion could accompany you at disciplinary or grievance hearings.

³ As of October 2024, employers have a legal duty to take reasonable steps to prevent sexual harassment.

A further time would be agreed for discussion if no resolution of the problem is initially possible.

The objective is to address situations positively and timely and correct them, so early advice of situations is far better than allowing them to deteriorate beyond a point where remedial action can be taken.

Breaches of policy

Group Horizon will ensure that any breach of this policy or complaint is dealt with in a serious, sensitive, and confidential manner, so that the matter can be resolved as quickly and as sensitively as possible for all concerned.

If after the investigation, it is proved that an individual has harassed any other worker on the grounds of gender, marital status, gender reassignment, ethnic or national orientation, nationality, race, colour, sexual orientation, religion, belief, trade union membership, part-time or fixed-term status, age, or disability, or otherwise act in breach of this policy, they will be subject to disciplinary action which may result in dismissal or termination of the working arrangement.

Anyone who raises a complaint in good faith will be protected against victimisation or less favourable treatment as a result.

Malicious or fake allegations of a breach of this policy will be treated as a serious disciplinary matter.

This policy will be reviewed annually, and its effectiveness will be monitored regularly to ensure that it is achieving its objectives. Group Horizon are committed to providing relevant training for all employees on their responsibilities under this policy.

Group Horizon reserves the right to change the contents of this policy, as necessary, from time to time to comply with changing legislation and company policy and will inform employees of any significant changes within one month of the change taking place.

Positive Discrimination

In line with the Equality Act 2010 and subsequent amendments, Group Horizon may implement Positive Action during recruitment and promotion processes to address under-representation or disadvantage among protected groups. Such measures will be proportionate and in accordance with current legislation.

Positive action in recruitment and promotion can be used where an employer reasonably thinks that people with a protected characteristic are under-represented in the workforce, or suffer a disadvantage connected to that protected characteristic.

In practice it allows an employer faced with making a choice between two or more candidates who are of equal merit to take into consideration whether one is from a group

that is disproportionately under-represented or otherwise disadvantaged within the workforce.

This is sometimes called either a 'tie-breaker' or the 'tipping point.' But this kind of positive action is only allowed where it is a proportionate way of addressing the under-representation or disadvantage.

More detailed information can be found in the Government Equalities Office guide "Equality Act 2010: What Do I Need to Know?" which can be found on the website:

www.equalities.gov.uk

Accountability

The Managing Director is responsible for ensuring that this policy is reviewed and updated annually or as required by legislative changes. Managers seeking advice and guidance about the Equality, Diversity & Inclusion Policy should contact the Managing Director. All employees are required to complete regular training on their responsibilities under this policy to ensure compliance and promote an inclusive workplace culture