

Equality and Diversity Policy

Introduction

This is Pendersons Ltd Equality and Diversity policy. It sets out the company's commitment to advancing equality and celebrating the diversity within the company and working with our customers. It has been written so that everyone in the company will know what we are committed to.

Our commitment to Equality and Diversity

As an employer and provider of training, assessment and consultancy services in different fields and vocational subjects, Pendersons Ltd is committed to advancing equality of opportunity and providing fair access and treatment at all times, including employment of full time and part time staff, and at all times whilst delivering our services.

We will support all of our staff and learners in realising their full potential, to exercise genuine choice and control over their own lives, for our staff to participate fully within business activities, and support both our staff and learners outside of the learning environment wherever possible.

To support our commitment to Inclusion, Equality and Diversity, Pendersons Ltd will:

1. Comply with and embrace equality law and good practice, including carrying out our public duties to promote equality
2. Regularly monitor, assess and consult on the impact of our policies, services and functions to ensure they are fair and reflect people's different needs and opinions
3. Use our influence in communities and with our partners and businesses to generate opportunities for our staff and learners
4. Celebrate diversity and equality whilst working with our customers and support initiatives for greater equality and diversity awareness
5. Embed equality and a consideration of diversity into our everyday business.
6. Ensure that staff are trained and are aware of their responsibilities in line with this policy

To do this we will expect all of our staff, and sub-contractors to:

- Treat everyone with dignity and respect at all times including customers, employees, learners and other people with a connection with the business
- Provide the best possible standards of service to all our customers
- Consider the needs and opinions of staff, sub-contractors, learners and customers
- Have a clear set of objectives for equality and diversity.

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Specific commitments in employment

Pendersons Ltd is committed to being a fair and supportive employer, enabling our workforce to deliver high quality services to everyone.

In order to achieve this we will:

- Carry out recruitment fairly and effectively
- Manage and equip our employees to implement this policy
- Treat all employees fairly, with dignity and respect at all times
- Not tolerate and take necessary action to deal with unacceptable behaviour at work
- Provide employees with opportunities to influence the development of our policies and practice
- Provide fair and transparent pay, reward and employment conditions
- Promote a work-life balance and opportunities to work flexibly
- Make reasonable adjustments in line with our legal duties, such as providing additional equipment or support to employees

The scope of our commitments

We will work to deliver our commitments by tackling inequality arising out of:

- Age
- Disability
- Gender re-assignment
- Marital status and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

Who is responsible for this Policy?

This Policy applies to every Director, Manager and employee of Pendersons Ltd, and any other person or organisation employed by Pendersons to work or to deliver services on its behalf, including those employed through contractual and as associate staff.

How we will ensure that this Policy is implemented

We will ensure that everyone associated with Pendersons Ltd is made aware of this Policy and understands their responsibilities for ensuring that it is implemented and worked with at all times. We will support people so they know how to implement the policy in relation to their role, through briefing and training sessions.

We will develop our approach to equality and diversity by identifying good practice in employment, service delivery and how we engage with our learners and customers.

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We will publish a strategy which sets out our approach to equality and diversity.

We will regularly monitor and report our progress in relation to published equality and diversity based objectives.

To do this, we will gather feedback from customers and employees in relation to employment, the delivery of services and the opportunities available to influence Pendersons Ltd decision-making in line with this policy.

We will use the information to monitor and assess:

- The take-up of our services
- Satisfaction with our services
- Effectiveness of our services
- The make-up of our workforce
- Effectiveness and impact of our employment practices
- Involvement in decision-making

Our promise on equality monitoring

Whenever we ask customers, learners or employees for information in order to undertake equality monitoring we will take care that the monitoring is appropriate and we will comply with four main rules:

1. Only ask for the information we need
2. Provide an explanation of why we need the information and how it will be used
3. Take care to ensure that individuals cannot be identified from the information collected, especially where the results of monitoring are made public or shared
4. Comply with the law in relation to confidentiality, data protection and freedom of information.

Making a complaint

If you feel you have experienced or are experiencing any form of discrimination, harassment or bullying, please consider in the first instance whether it is appropriate to raise the matter directly with the person concerned. If it is not appropriate to do so, or you feel unable to do so, please discuss the matter with your Line Manager. If you feel unable to do this, the appropriate point of contact is the Compliance Manager.

Following initial discussions with your Line Manager or the Compliance Manager, you will be asked to choose one of the following options:

- No further action necessary
- Discuss the complaint directly with the individual who is alleged to have caused offence
- Ask your Line Manager/Compliance Manager to help you resolve the matter through informal approaches
- Make a formal written complaint to the Compliance Manager. This will initiate a full investigation and if appropriate, recourse to the disciplinary procedure.

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If the alleged discrimination, victimisation or harassment involves a client or an employee of a client, or if an employee of a client is alleged to have acted in a discriminatory or harassing manner, appropriate action to deal with the problem will be discussed with the person making the complaint.

Investigation

Once a formal written complaint has been made, the first step is to investigate the allegations as carefully and discreetly as possible. This will involve hearing detailed accounts from both parties - others may also be asked to provide information. Documents, emails and other evidence may be considered. A full record of the progress and outcome of the investigation and any steps taken will be reported to the complainant at the earliest opportunity. Those conducting the investigation will not be parties directly involved in the allegation.

In extreme cases (for example, where it is felt that others could be at risk if no action is taken), we may need to investigate and take disciplinary action even if a formal written complaint is not made.

Disciplinary procedure

If the investigation concludes that there appears to be substance to the complaint, it will normally be appropriate for the disciplinary procedure to be initiated. The Disciplinary Procedure is set out in full on My Cloud. Modifications to the procedure may be necessary to reflect the sensitive nature of the allegations.

We would normally seek the agreement of the complainant prior to commencing disciplinary action. However, there may be occasions where despite the views of the complainant, we may need to pursue the matter formally. The matter will be dealt with promptly, fairly and impartially. Care will be taken to ensure that the reputation of each party is not unjustly affected during the course of any investigation.

We will protect individuals who make a complaint or assist in an investigation from harassment and victimisation. Any acts of retaliation or intimidation against the complainant will be treated as a disciplinary matter.

If the complaint is not upheld

If the complaint is not upheld we will advise the individual bringing the allegation and provide an explanation for and the reasoning behind the decision made.

Individuals who maliciously make an unfounded complaint will be subject to disciplinary action.

Victimisation

Any person raising a concern under this policy whether informally or formally will be protected against any adverse treatment from colleagues. It is victimisation to penalise or retaliate against a person who brings complaints of discrimination or harassment in good faith, through any form of less favourable treatment. Any person who does victimise will be subject to disciplinary action, following an appropriate investigation to the complaint. Anyone

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who considers that they have been victimised should raise this with their Line Manager or the Compliance Manager without delay in accordance with the complaints procedure.

Managers who observe harassment, discrimination/victimisation has a duty of care and responsibility to act and should:-

- Talk to the individual to see if concerns arise
- Consider action whether informal or formal in more serious cases
- Seek advice from the director

Monitoring

We are committed to monitoring the effectiveness of this Equality and Diversity Policy and the associated complaints procedure. We undertake to regularly review all our policies, procedures and practices in relation to recruitment and selection, terms and conditions of employment, learning and development opportunities, career development, promotion and grievance and discipline to ensure they comply with any legislative changes and good practice. We will endeavour to identify and take all steps necessary to eliminate any unjustified discrimination or victimisation which is revealed by this monitoring process and which is required to achieve our commitment and vision for equality and diversity.

The Director can be contacted by sending an email to info@pendersons.com



Mark Pender

Company Director

Review due by 15th January 2021