



Equality & Diversity Policy

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1. Purpose

The purpose of this policy, and its associated procedures, toolkits and other guidance documents, is to outline CoverMe's commitment to eliminating inequality and discrimination as well as promoting a diverse and inclusive working environment for all.

This policy covers all individuals working at all levels and grades, including directors, senior managers, employees, part-time, casual and fixed-term employees, (collectively referred to as **employees** in this policy) and extends to contractors and consultants. It also applies to customers, sub-contractors, suppliers and any other individual to which we provide services for.

2. Aims

CoverMe's aim is to recruit, promote and train the best person for the job and to create a working environment free from discrimination, victimization and harassment in which all employees are treated with dignity and respect.

This policy is designed to meet our commitment to equality, valuing diversity and promoting a working environment where everyone's contribution is recognised and valued. We are committed in our core values of teamwork and respect for each other.

We oppose all forms of unlawful or unfair discrimination. No employee or individual listed will receive less favourable treatment or, for any reason, be disadvantaged by any conditions of employment or requirements of the company that cannot be justified as necessary operational or legal grounds. We oppose all forms of discrimination on the grounds of race, sex or gender identity, sexual orientation, marital or civil partnership status, religion or belief, disability, age or employment status.

All employees will have the same opportunities for training, development and promotion, taking into consideration their ability, experience, behaviour and work performance. We understand each employee is unique and we positively recognise differences to treat everyone with respect. Regardless of role, level, experience or personal characteristics we actively support all employees to strive to be the best they can be.

3. Responsibilities

Equality and Diversity at work is everyone's responsibility and as such all employees, irrespective of position, are expected to always comply with this policy. We are all expected to treat each other with dignity and respect. We also expect our customers, contractors and suppliers to do the same.

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Employees responsibilities include:

- To co-operate with any measures introduced to ensure equality, diversity and inclusion in the workplace.
- To report any discriminatory acts or practices immediately.

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Employees responsibilities include:

- To co-operate with any measures introduced to ensure equality, diversity and inclusion in the workplace.
- To report any discriminatory acts or practices immediately.
- To not induce or attempt to induce others to practice unlawful discrimination.
- To not to victimise anyone who has reported or provided evidence of discrimination.
- To not harass, abuse, bully or intimidate others.
- To have read, always understand and comply with the policy.

Managers and 'Heads of' have a responsibility to ensure that their teams are aware of this policy and their obligation to comply with it, and that employment practices within their areas of work support the principles of this policy. We will also expect them to act in response to discrimination, harassment or victimisation observed or have raised to them. Any employee responsible for the recruitment of new staff and training and promotion of current staff within their Contract/Department will ensure that the policy is complied with also.

Vice Presidents, Senior Managers/Managing Directors are responsible for the overall implementation of the policy within the company. Ensuring that their reports understand the importance of this policy, providing coaching and access to training where appropriate.

Human Resources are responsible for ensuring this policy is adequately implemented, monitored and maintained and to ensure that training on the application of this policy is provided to those with management and/or recruitment responsibilities where appropriate.

4. Legislation

This policy takes account of relevant legal standards. The key law which informs our approach to Equality, Diversity and Inclusion is the Equality Act (2010)

The Equality Act (2010) aims to create "a society built on fairness and respect where people are confident in all aspects of their diversity." The Act harmonises all previous pieces of discrimination legislation and strengthens the law to support progress on equality. This legislation encompasses many previous pieces of legislation, including Equal Pay Act 1970, Sex Discrimination Act 1975, Race Relations Act 1976, Disability Discrimination Act 1995, Employment Equality (Religion or Belief) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003 and the Employment Equality (Age) Regulations 2006.

The Equality Act (2010) extends the range of lawful positive action to overcome or minimise a

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disadvantage arising from a protected characteristic. This legislation extends the circumstances in which a person is protected against discrimination, harassment or victimisation because of a protected characteristic and allows employment tribunals to make recommendations in discrimination cases which apply to the whole organisation.

The European Human Rights Commission (EHRC) Statutory Code of Practice in Employment (2011) informs our approach and covers employment and work-related activities under Part 5 of the Act. Whilst this Code does not impose legal obligations, nor is it an authoritative statement of the law; the Code can be used in evidence in legal proceedings brought under the Act. Tribunals and courts consider any part of the Code arising in proceedings.

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Underpinned by the Equality Act (2010) and EHRC Employment Code of Practice (2011), this policy actively promotes the avoidance of any form of discrimination which we recognise is a barrier to equality, diversity, inclusion and human rights. This policy is to be applied consistently across the whole organisation as we aim to abide by and promote equality legislation throughout the company.

5. Definitions

A few definitions used within this policy are outlined below:

Protected Characteristics: It is against the law to discriminate against someone because of a protected characteristic. Protected Characteristics are defined as Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex (or Gender) and Sexual Orientation.

Direct Discrimination: Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic, or because of their association with another person who possesses a protected characteristic, or by an individual's perception of another person possessing a particular protected characteristic.

Indirect Discrimination: Indirect discrimination can occur when you have a condition, rule, policy or even a practice that applies to everyone but particularly disadvantages, excludes or penalises people who share one or more protected characteristics and cannot be shown to be justifiable.

Victimisation: Occurs if a person suffers a detriment because the individual has exercised his or her rights under this policy or the relevant legislation, as well as made, supported or perceived to have a complaint or grievance under the Equality Act.

For example, treating somebody less favourable in the event they bring proceedings under the Equality Act, gives evidence or information in connection with a complaint under the Act, or alleges that the Act has been or is being contravened.

Harassment: Occurs when unwanted conduct related to a relevant protected characteristic takes place, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

6. Equality & Diversity in the Workplace

The principles contained within this policy and all associated procedures should be always adhered to in our workplace. This section outlines expectations for the equal and inclusive treatment of CoverMe employees who hold one or more of the protected characteristics.

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6.1 Age

A person belonging to a particular age or range of ages (for example 18 to 30 year olds) will not be treated any less favourably than another. All instances of age discrimination must be dealt with appropriately.

6.2 Disability Discrimination

A person who has a disability, whereby there is physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities, will not be treated any less favourably than others. All instances of disability discrimination must be dealt with appropriately.

The Company values the individual contribution of all employees and is committed to its social, moral and statutory duty that disabled employees are treated with respect and dignity. We must take all reasonable steps in accommodating the needs of disabled people to enable them to be employed and to continue in employment where they are able to perform the functions of the job. We will make every effort to identify the adjustments that may be needed to support a disabled colleague to participate in the workplace and perform effectively in their role.

However, it may not be possible to make reasonable adjustments, such as when the building's physical features cannot be changed. If the company cannot provide a safe working environment for a disabled person, it may not be possible to continue a disabled individual's employment. All decisions in relation to the employment of an individual who has a disability will be based on the individual's ability to do the job and a consideration of reasonable adjustments. Human Resources must be contacted in the event of this situation.

6.3 Sex (or Gender Identity)

A person identifying as a particular sex or gender identity should not be treated any less favourably than another. Gender identity includes male, female, neither of these, both, transgender, or other gender(s).

6.4 Gender Reassignment

A person who has or is in the process of transitioning from one gender to another will not be treated any less favourably than others. All instances of gender reassignment discrimination must be dealt with appropriately.

Contact Human Resources and refer to the Transgender Toolkit for further advice and support available to transgender employees.

6.5 Marriage and Civil Partnership

A person with a particular marital status (e.g. Single, Married, Civil Partnership) should not be treated any less favourably than another. All instances of Marriage and Civil Partnership discrimination must be dealt with appropriately.

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6.6 Pregnancy and Maternity

A person who is pregnant, expecting a baby or is on maternity leave should not be treated any less favourably than others. Please refer to the company's Maternity Policy and Procedure. All instances of pregnancy and maternity discrimination must be dealt with appropriately.

6.7 Race

A person or group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins, should not be treated any less favourably than others. All instances of race discrimination must be dealt with appropriately.

6.8 Religion or Belief

A person or group of people defined by their religion or belief (including lack of religion) should not be treated any less favourable than other. Generally, a belief should affect an individual's life choices, or the way they live, for it to be defined as a protected characteristic. Any and all instances of religious or belief discrimination must be dealt with appropriately.

6.9 Sexual Orientation

A person should not be treated any less favourable due to their sexual orientation. Any and all instances of sexual orientation discrimination must be dealt with appropriately.

The Equality & Diversity Procedure provides further guidance on the implementation of this policy. Human Resources must be contacted in all instances of discrimination being observed or raised by others to ensure the situation is dealt with appropriately.

7. Equality & Diversity in Recruitment and Selection

Our recruitment and selection procedures are designed to be objective and based on merit. This policy applies to instances of internal and external recruitment activities, including all job advertisements, selection procedures, candidate interviews and appointments of external candidates as well as existing employees. This policy also covers instances of opportunities for promotion and transfer of existing employees within the company

The company's Recruitment and Selection Policy and Procedure will be always followed alongside the Equal opportunities Policy & Procedure during all recruitment activity conducted within the company.

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8. Expected Behaviours

We aim to have a working environment that is free from discrimination, harassment and victimisation. Bullying or Harassment on the grounds of a protected characteristic is discrimination and the company has zero tolerance approach for this behaviour.

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Examples of behaviour which are not tolerated include:

- Making discriminatory comments, gestures or other inappropriate behaviour towards someone, particularly on the grounds of race, sex or gender identity, sexual orientation, marital or civil partnership status, religion or belief, disability, age or employment status.
- Ridiculing or demeaning someone on the grounds of their race, sex or gender identity, sexual orientation, marital or civil partnership status, religion or belief, disability, age or employment status.
- Threatening, abusing or harassing another person on the ground of their race, sex or gender identity, sexual orientation, marital or civil partnership status, religion or belief, disability, age or employment status.
- Treating another employee unfairly or less favourably than another.
- Overbearing supervision or other misuse of power or position towards certain individuals or group of people on the grounds of race, sex or gender identity, sexual orientation, marital or civil partnership status, religion or belief, disability, age or employment status.
- Display of offensive materials, including being targeted at an individual or group of people. For example, displaying content of a homophobic nature.
- Failure to treat others with dignity and respect at work.
- Any other instances or behaviour deemed discriminatory in nature by the company.

9. Raising Concerns

Any employee with questions or concerns about any type of discrimination in the workplace are encouraged to raise them with their line manager, or Human Resources. This may be dealt with informally in the 1st instance and employees wishing to make a formal complaint about discrimination should use the company's Grievance Procedure.

Where a concern about discrimination is raised, all discussions will be treated in the strictest confidence and will not be disclosed to anyone other than the individuals conducting the investigation. To ensure a full investigation takes place, it may be necessary to disclose information to others involved in the investigation. Any necessary disclosure of information will be clearly explained to the complainant.

Employees who feel they are the subject of bullying, harassment or victimisation, the company's bullying and harassment policy provides guidance on raising and addressing such concerns.

We view any breach of this policy, or a breach of the bullying and harassment policy, as a serious matter.

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The company will take such action as is appropriate in the circumstances to deal with any such acts that are found to have occurred. Any employee who breaches this policy will be liable to disciplinary action up to, and including, summary dismissal. Employees who commit serious acts of unlawful discrimination or harassment may also be guilty of a criminal offence.

False allegations made in bad faith will be dealt with under the Company's Disciplinary procedure.

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10. Associated Policies

This policy and its associated procedures should be read in conjunction with other relevant policies where appropriate, e.g. Equal Opportunities, Grievance and Disciplinary Policy and Procedures.

The Equality & Diversity Procedure is to be used in conjunction with this policy as well as accessing specific toolkits when the appropriate need arises.